

WEST VIRGINIA
SECRETARY OF STATE

BETTY IRELAND

ADMINISTRATIVE LAW DIVISION

Form #5

Do Not Mark In This Box

FILED

2006 JUL 13 P 3:49

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 §§18-2-5, 18-2-13f and 18-2-13h

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 _____ NO X

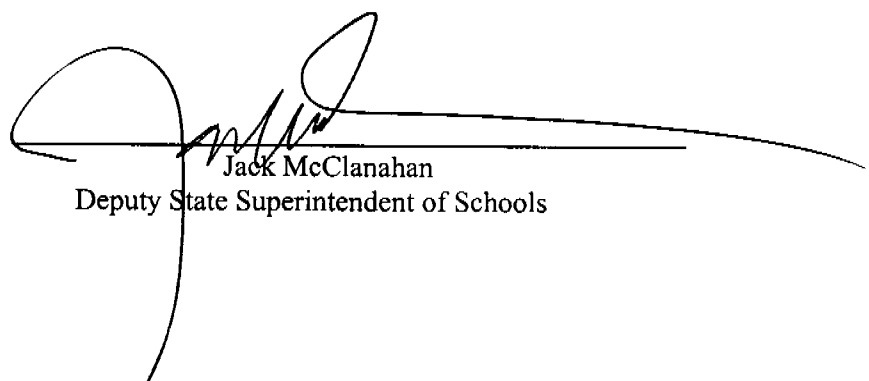
IF YES, SERIES NUMBER OF RULE BEING AMENDED: _____

TITLE OF RULE BEING AMENDED: _____

IF NO, SERIES NUMBER OF NEW RULE BEING PROPOSED: 53

TITLE OF RULE BEING PROPOSED: High Quality Standards for Juvenile Institutional
Education Programs (2325)

THE ABOVE RULE IS HEREBY ADOPTED AND FILED WITH THE SECRETARY OF STATE. THE
EFFECTIVE DATE OF THIS RULE IS August 14, 2006.



Jack McClanahan
Deputy State Superintendent of Schools

EXECUTIVE SUMMARY
AND
WEST VIRGINIA BOARD OF EDUCATION POLICY

FILED

2006 JUL 13 P 3:49

OFFICE WEST VIRGINIA
SECRETARY OF STATE

Policy Number and Title:

Policy 2325
High Quality Standards for Juvenile Institutional Education Programs

Background:

- Two recent reports have recommended that the West Virginia Board of Education develop education standards for children and youth in out-of-home care (viz., *Reaching Every Child: addressing Educational Attainment of Out of Home Care Children in West Virginia (2005)* and *Advancing New Outcomes: Findings, Recommendation & Initial Actions of the West Virginia Commission to Study Residential Placements in Children (2006)*).
- Policy 2325 establishes high quality standards for juvenile institutional education programs under the governance of the West Virginia Board of Education and the State Superintendent of Schools.
- These proposed standards have been modeled after the state's accreditation standards set forth in Policy 2320: A Process for Improving Education: Performance Based Accreditation System.

Reasons for New Policy:

- The purpose of establishing high quality standards for juvenile institutional education programs is to provide for the accreditation of programs provided by the Department of Education's Office of Institutional Education Programs in juvenile institutions.

Impact:

- The adoption of standards for the West Virginia Department of Education's Office of Institutional Education Programs assures that juveniles in institutions are afforded the opportunity to receive an adequate and appropriate education in accordance with applicable state and federal laws, policies and regulations.
- The adoption of standards assures that juveniles in institutions are able to advance in school and are prepared for reentry to public schools, postsecondary education or the world of work.
- Program accreditation assures effective and efficient education programs in juvenile institutions.
- Program accreditation provides accountability to the public for the education provided by the Office of Institutional Education Programs.

Policy 2325
High Quality Standards for Juvenile Institutional Education Programs
Executive Summary
Page 2

Response to Comments:

- Eighty-six (87) comments were received from 26 individuals/organizations. The comments received were reviewed and action was taken in response to these comments as indicated on the comment log. As a result of the comment period, four (4) changes were made in the proposed policy as follows: (1) clarification that career-technical training programs are aligned with state and national job market opportunities; (2) reduction of the standard specifying the minimal percentage of time school counselors spend in a direct counseling relationship with students from 75% to 60% as a result of the special role school counselors play in an institutional setting; (3) clarification that five-year individualized student transition plans are developed in accordance with Policy 2510; and (4) addition of language ensuring that schools afford appropriate educational opportunities to students who have obtained a high school or General Education Development (GED) diploma.
- Many of the comments reflected issues regarding the implementation of a standard or requested guidance and technical assistance.

FILED

TITLE 126
LEGISLATIVE RULE
BOARD OF EDUCATION

2006 JUL 13 P 4:14

SERIES 53
HIGH QUALITY STANDARDS FOR JUVENILE
INSTITUTIONAL EDUCATION PROGRAMS (2325)

OFFICE WEST VIRGINIA
SECRETARY OF STATE

§126-53-1. General.

1.1. Scope. - This rule establishes high quality standards for juvenile institutional education programs under the governance of the West Virginia Board of Education (hereinafter WVBE) and the State Superintendent of Schools. These standards are not applicable to education programs in juvenile detention centers.

1.2. Authority. - West Virginia Constitution, Article XII, §2 and W. Va. Code §§18-2-5, 18-2-13f and 18-2-13h.

1.3. Filing Date. - July 13, 2006

1.4. Effective Date. - August 14, 2006

1.5. Repeal of Former Rules. - None, this is a new rule.

§126-53-2. Purpose.

2.1. The purpose of establishing high quality standards for juvenile institutional education programs under the governance of the WVBE and State Superintendent of Schools is to provide for the accreditation of these programs by the Office of Education Performance Audits. Program accreditation assures effective and efficient education programs and accountability to the public for the education provided by the West Virginia Department of Education's Office of Institutional Education Programs in juvenile institutions.

§126-53-3. High Quality Standards.

3.1. The WVBE hereby adopts education standards for the West Virginia Department of Education's Office of Institutional Education Programs that assure juveniles in institutions are afforded the opportunity to receive an adequate and appropriate education in accordance with applicable state and federal laws, policies and regulations; continue to advance in school; and are prepared for reentry to the public schools, postsecondary education or the world of work. The Office of Institutional Education Programs, in order to define its education programs, shall establish operational policies and implement written procedures that reflect the education standards adopted by the WVBE.

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3.2. Governance, Leadership, Mission, and Planning. The mission of the organization is reflected in strategic planning and daily governance.

3.2.1. Legal Basis. There is a legal basis for the organization/school to provide education programs in institutions.

3.2.2. Mission and Goals. The mission and goals of the organization/school provide direction for planning the school's education program.

3.2.3. Leadership and School Culture. Effective leadership exists at the organization, school, and classroom levels. Leadership is demonstrated by vision, school culture and instruction, management and environment, community and professionalism.

3.2.4. Strategic Plan. School leaders collaborate with school staff to develop and implement a formal, written Strategic Plan. The Strategic Plan is based on data regarding student achievement, program delivery and student outcomes. The Strategic Plan provides for the establishment, implementation, evaluation and monitoring of a continuous process of school improvement. The strategic plan is reviewed and updated annually.

3.3. Curriculum and Instruction. The curriculum and instructional practices of the organization and the school are based on WVBE policy and research, and ensure that institutionalized students have an adequate and equitable opportunity to learn.

3.3.1. Curriculum Based on Content Standards and Objectives. The curriculum is based on the content standards and objectives approved by the WVBE. Content standards are used by schools to guide instruction.

3.3.2. High Expectations. Through curricular offerings, and instructional and administrative practices, staff demonstrates high expectations for the learning and achieving of all students.

3.3.3. Equal Opportunity. Curriculum, instructional practices, and instructional materials ensure that all students have equal opportunity to acquire the knowledge and skills needed to succeed academically and in the workplace.

3.3.4. Learning Environment. School staff provides a safe, positive and nurturing environment that is conducive to learning.

3.3.5. Instruction. Instruction is consistent with the content standards and objectives and appropriate for the student's developmental and grade level.

3.3.6. Instruction in Writing. Instruction in writing shall be a part of every student's weekly education program in every appropriate class.

3.3.7. Library/Educational Technology Access and Technology Application. The application of technology is included throughout the school program and students have regular access to library/educational technology centers or classroom libraries.

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3.3.8. Instructional Materials. All students have access to approved and appropriate up-to-date textbooks, instructional materials, and other resources in all curricular areas.

3.3.9. Core Programs. The school's course offerings include the four core academic areas (English/language arts, mathematics, social studies, and science) and programs in developmental guidance, career development and transition skills.

3.3.10. Elective Offerings. An elective offering must be based on approved WVBE content standards and objectives or have written goals and objectives that are approved by the WVBE.

3.3.11. Lesson Planning. Teachers prepare lesson plans in advance. Lesson plans are based on approved content standards and objectives. The administrator reviews lesson plans a minimum of once each quarter and provides written feedback.

3.3.12. Research-Based Instructional Strategies. Staff demonstrates the use of research-based instructional strategies that facilitate learning for all students.

3.3.13. Tolerance and Diversity Education. Tolerance and diversity education is included in the school program, with an emphasis on prevention and zero tolerance for racial, sexual, religious/ethnic harassment or violence.

3.3.14. Instructional Day. Priority is given to teaching and learning, and classroom instructional time is protected from interruption. The educational program will provide students the opportunity for a full instructional day in accordance with W. Va. 126CSR42, WVBE Policy 2510, Assuring the Quality of Education: Regulations for Education Programs (hereinafter Policy 2510). The school submits a calendar with a minimum 180 instructional days. An extended school term is provided as required by statute or interagency agreement.

3.3.15. Alignment with Job Market Opportunities. The career-technical training programs are aligned with state and national job market opportunities.

3.3.16. Career Clusters and Majors. Students have an opportunity to examine a system of career clusters in grades 5-8 and to select a career cluster to explore in grades 9 and 10.

3.3.17. Career Advisement. Students are provided advisement opportunities to allow them to choose a career major prior to completion of grade 10.

3.3.18. Work-Based Learning. A work-based learning experience, such as workplace simulation, community service or school or facility-based enterprises, is provided for all students at some time in grades 9-12.

3.3.19. Monitoring Student Progress. Student progress is frequently monitored through assessment, and the results are used to improve instruction.

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3.3.20. Flexibility of Instruction. The instructional program will accommodate the frequent entry and exit of students.

3.4. Performance Measures for Accountability. The organization/school uses multiple measures to annually evaluate program effectiveness.

3.4.1. Student Achievement. Students demonstrate mastery of the state content standards and progress in academic achievement.

3.4.2. Units of Credit. Students accrue school credits that meet state requirements for grade promotion and secondary school graduation.

3.4.3. School Advancement. Through participation in the school's education program, students advance to the next education level.

3.4.4. Program Completion. Students earn a high school or General Educational Development (GED) diploma.

3.4.5. Career-Technical Credentials. Students earn licenses, certificates and other credentials recognized by business and industry in career technical programs.

3.4.6. Transition Success. Successful transition is demonstrated by student re-entry to public school, enrollment in postsecondary education, or entry to the workforce.

3.5. Student Planning and Services. Services to students facilitate academic achievement and personal development.

3.5.1. Data Analysis. The school analyzes, interprets, and uses student performance data to identify and assist students who are not at grade level in achieving mastery of the state content standards and objectives.

3.5.2. Guidance and Advisement. Students are provided specific guidance and advisement opportunities in the areas of academic development, career development and personal/social development.

3.5.3. Counseling Services. School counselors spend at least sixty percent (60%) of the work day in a direct counseling relationship with students, and devote no more than forty percent (40%) of the work day to counseling-related administrative activities.

3.5.4. Enrollment and Transfer of Records. The school properly enrolls residents in the education program, completes intake interviews and assessments, and obtains education records.

3.5.6. New Student Orientation. The school provides students with an orientation to education programs, services and behavioral expectations.

3.5.7. Student Assessment and Program Planning. School-based teams use comprehensive assessment to facilitate and expedite student planning and programming. An

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individual program plan is developed for each student. Plans address academic performance and behavioral intervention strategies.

3.5.8. Student Records. Teachers maintain student education progress reports and/or grades, which are incorporated into the student cumulative records. Access, storage and transfer of student records meet the requirements of privacy and confidentiality according to law and regulation.

3.5.9. Educational Incentives. There are operational policies and procedures and evidence of implementation and practice that provide educational incentives to encourage student involvement and achievement in educational programs.

3.5.10. Programs for Segregated Students. There are operational policies and procedures and evidence of implementation and practice for providing or restricting educational programming to students in segregated, restricted, or suspended status.

3.5.11. Transition Plans. In accordance with Policy 2510, the school develops and implements an Individualized Student Transition Plan (academic five-year plan) for each student.

3.5.12. Transition. The school has a process for student transition and follow-up. Upon student discharge, the school transfers education records in a timely fashion.

3.5.13. Equal Access. All students have equal access to educational opportunities regardless of gender, race, or disability. The school affords appropriate educational opportunities to all students under age 21 who have obtained a high school or General Educational Development (GED) diploma.

3.6. Special Education and Title I Services. The organization and school provide equal educational opportunity to all students with disabilities.

3.6.1. Policy and Procedure. The organization and school follow approved procedures for implementing state, and federal policy regarding special education and Title I services.

3.6.2. Monitoring. Special education and Title I program monitoring results are reviewed and findings are corrected or an approved plan exists for correction.

3.7. Facilities. The organization and school work in collaboration with the host agency to provide safe and adequate facilities for learning.

3.7.1. Adequate Facilities. Facilities are adequate to meet the needs of students and to provide an environment conducive to learning.

3.7.2. Safe Facilities. Facilities are safe and free of hazards. Observable safety hazards are reported and corrected, following procedures in interagency agreements.

3.7.3. Interagency Agreements. Interagency agreements clearly specify host agency responsibilities for providing adequate facilities and maintenance.

3.7.4. Regulatory Agency Reviews. Following facility reviews and inspections by regulatory agencies, findings are reported and deficiencies corrected consistent with interagency agreements.

3.8. Administrative Practices. The organization and school consider data and research, and implement procedures that conform to W. Va. Code and WVBE policy to achieve the consistent and efficient operation of school programs.

3.8.1. Organization Policy and Procedure Manual. An organizational policy and procedure manual provides guidance in the implementation of applicable WVBE policies, state and federal laws and regulations, accreditation standards, personnel policies and procedures and directives from the State Superintendent of Schools or designated staff.

3.8.2. Organization Policy Implementation. The organization and school implement policies and operational procedures as set forth in the policy manual.

3.8.3. Statewide Assessment. Test security measures are in place for mandated statewide testing. Students in appropriate grade levels participate in statewide assessments.

3.8.4. Assessing Academic Gains. The school administers pre- and post-assessments to measure students' academic gains.

3.8.5. Measuring Mastery. The school assesses students' mastery of state content standards and objectives.

3.8.6. Codes of Conduct. The organization and school implement, investigate, and monitor W. Va. 126CSR99, WVBE Policy 4373, Student Code of Conduct and W. Va. 126CSR162, WVBE Policy 5902, Employee Code of Conduct.

3.8.7. Student-Teacher Ratio. An organizational policy or procedure establishes maximum teacher-pupil ratios consistent with student needs and established legal requirements.

3.8.8. School-Host Agency Collaboration. The school and host agency develop a collaborative partnership that ensures a positive school culture and supports the delivery of a high quality education program.

3.8.9. Communication. School and host agency staff collaborate to share information about students' educational needs and progress and to plan transition and discharge.

3.8.10. Parents. The school provides parents with information concerning student progress and encourages parental participation in the education process.

3.8.11. Physical Assessment. The school participates in the appropriate statewide physical assessment program.

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3.9. Safe, Drug Free, Violence Free, and Disciplined Schools. The school maintains a safe, drug free, violence free, and disciplined learning environment that ensures the physical, social, and emotional well being of students and staff and that respects individual differences.

3.9.1. School Rules, Procedures, and Expectations. School rules, procedures, and expectations are written, clearly communicated and enforced.

3.9.2. Behavior Management. There is a uniform and consistent approach to managing student behavior that includes the establishment and implementation of written procedures, staff training and collection and analysis of data.

3.9.3. Policy Implementation. The organization develops and implements operational policies and procedures, consistent with WVBE policies and W. Va. Code, governing employee disciplinary procedures; racial, sexual, religious/ethnic harassment and violence; substance abuse; tobacco use; student confidentiality; grading; health and safety of staff and students, security, staff-student relationships; supervision of students; and reporting of child abuse and neglect.

3.10. Finance. The organization and school use resources efficiently and effectively for student, school and organization performance and progress.

3.10.1. Resource Allocation. Resource allocations ensure that all students are provided equal education opportunities through qualified personnel and adequate, appropriate instructional materials, supplies, and equipment.

3.10.2. Allocations for School Improvement. Resources for school improvement are allocated and expended toward meeting the goals and objectives of the strategic plan.

3.10.3. Accounting Practices. Organization/school accounting procedures are consistent with state policies and procedures.

3.11. Personnel. The organization employs personnel to deliver high quality programs and services to students that ensure academic success; implement employment hiring and assignment practices that conform with W. Va. Code and WVBE policy; and promote the development of human resources.

3.11.1. Hiring. The organization follows hiring practices set forth in the WVBE approved Employee Handbook for Institutional Education.

3.11.2. Licensure. Professional educators and other professional personnel are licensed for their assignments under WVBE policy.

3.11.3. Evaluation. The organization and school implement an evaluation policy for professional and service personnel in accordance with WVBE policy.

3.11.4. Orientation and Mentoring. The organization develops operational policies and implements procedures for the orientation of new employees. The organization develops and

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implements a beginning teacher internship program and a beginning principal internship program.

3.11.5. Staff Development. The organization develops operational policies and implements procedures for the delivery of professional growth and development opportunities for employees. School staff participate in required staff development training.

FISCAL NOTE WORKSHEET
(Submit 4 Copies)

NO _____ DRAFT NO _____ BILL NO _____ RESOLUTION NO _____

SUBJECT Policy 2325: High Quality Standards for Juvenile Institutional Education Programs

FUND _____

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

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

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

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

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

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

DATE

AGENCY

AUTHORIZED REPRESENTATIVE

March 20, 2006

West Virginia Department of Education

Steve L. Paine

Policy 2325: High Quality Standards for Juveniles in Institutional Education Programs

COMMENT LOG

April 14, 2006 to May 15, 2006

A =Accepted, N =Not Accepted, N/A =Not Accepted + =Positive, - =Negative, 0 =Neutral

Date:	Individual/Organization:	Comments:	Action Type	Rationale
May 2, 2006	Kathryn Toler Lead Teacher Mt. Olive Correction Complex	§126-53-2. Purpose I feel that CEA Accreditation verifies that we in adult education provide quality programming for our students. Accreditation standards serve as a guideline that compels us to perform as we are required to. Always in my mind is what I need to be doing as lead teacher and what I need to have documented to prove what I am doing. Everyone profits. I feel that this process will improve juvenile educational services and keep all facilities on the same page. Even though a school might be doing a good job at serving its students, it can always do better. Accreditation motivates us.	N/A +	This comment does not call for any changes to policy. It expresses support for proposed Policy 2325.
May 2, 2006	Ray E. Nichols Vocational Instructor Mt. Olive Correction Complex	§126-53-1. General Follows mandates for education guidelines applicable to adult facilities with modifications for juveniles. Good.	N/A +	This comment does not call for any changes to policy. It expresses support for proposed Policy 2325.
May 2, 2006	Demarcus Smith Vocational Instructor Mt. Olive Correction Complex	§126-53-1. General Reads to be useful to adult facilities as well as juvenile facilities.	N/A +	This comment does not call for any changes to policy. It expresses support for proposed Policy 2325.
May 2, 2006	Stephen Logan Business Computer Teacher Mt. Olive Correction Complex	§126-53-1. General 3.3.11 Lesson Planning - If acquisition Learning Focused Strategies is to remain policy, then should not the lesson planning summary identify LFS?	N -	This request would require placing a vendor's product in policy, which would be inappropriate.

Date:	Individual/Organization:	Comments.	Action Type	Rationale
May 3, 2006	Angela Grisso WV Industrial Home For Youth	126-53-3. High Quality Standards 3.3.16 Limit to Career Clusters & Majors due to limited course offerings. 3.3.18 Impossible to job shadow/work-based learning within facility except for Culinary Arts. 3.4.1 When will end of course exams be developed and by whom? 3.5.9 We need to develop more incentives.... maybe line item in budget to help with this...need to correct flaw in WVEIS for GPAs 3.8.5 Measure Mastery how? WESTEST? What else? 3.9.2 We need this in finalized written form. 3.11.5 Staff Development – need to allow for outside training opportunities – not just for OIEP trainings	N/A 0 N/A 0 N/A 0 N/A + N/A 0 N/A 0 N/A 0	This comment does not call for any changes to policy. It expresses concern regarding implementation. This comment does not call for any changes to policy. It expresses concern regarding implementation. This comment does not call for any changes to policy. It asks an implementation question. This comment agrees in principle with proposed Policy 2325 that educational incentives are characteristic of effective schools. This comment does not call for any changes to policy. It asks implementation questions. This comment does not call for any changes to policy. It expresses an implementation concern. This comment does not call for any changes to policy. It expresses on implementation concern.

Date:	Individual/Organization:	Comments:	Action Type	Rationale
May 3, 2006	Kristina Robinson WV Industrial Home For Youth	<p>§126-53-3. High Quality Standards</p> <p>3.3.13. Tolerance and Diversity Education: We are still using TLC Curriculum to address a variety of these issues. We have yet to receive ACTS Curriculum.</p> <p>3.3.15 Alignment with Job Market Opportunities: Difficult to offer career tech programs that align with employment trends. We are quite limited to electives we can offer.</p> <p>3.3.17 Career Advisement: What about Career Majors we don't offer here? Do we limit them to only those offered at our facility?</p> <p>3.3.18 Work-based Learning: Provided for all students at "some time" in grades 9-12. How long of a time frame is the "some time"?</p> <p>3.4.1 Student Achievement: Document mastery through WESTEST and End of Course Exams.</p> <p>3.5.1 Data Analysis: What data are utilized? Achievement testing? TABE?</p> <p>3.5.7 Student Assessment and Program Planning: To what types of school-based teams is the policy referencing? SAT team would be ideal.</p> <p>3.5.11 Transition Plans: 5 Year Plans – Do we develop these based on our curriculum (i.e., limited electives) or public school curriculum?</p>	<p>N/A 0</p> <p>N/A 0</p> <p>N/A 0</p> <p>N -</p> <p>N/A 0</p> <p>N/A 0</p> <p>N/A 0</p> <p>N/A 0</p> <p>N/A 0</p>	<p>This comment does not call for any changes to policy. It expresses implementation issue.</p> <p>This comment does not call for any changes to policy. The alignment of career and technical programs with employment trends is a characteristic of effective and efficient schools. Standards 3.3.15 and 3.3.17 may require the development or revision of technical programs.</p> <p>This comment does not call for any changes to policy. It expresses on implementation issues.</p> <p>The standard provides flexibility in implementation and is the same standard used in Policy 2320.</p> <p>This comment does not request any changes to policy. It is a request for information regarding implementation.</p> <p>This comment does not request any changes to policy. It is a request for information regarding implementation.</p> <p>This comment does not request any changes to policy. It is a request for guidance regarding implementation. An SAT team would satisfy this standard.</p> <p>This comment does not request any change to policy. It is a request for guidance in implementation.</p>

Date:	Individual/Organization:	Comments:	Action Type	Rationale
May 3, 2006	Carolyn Yokam Chief Executive Officer Eikins Mountain School 100 Bell Street Elkins, WV 26241	3.11.5 Staff Development: Additional Opportunities for training (i.e., professional growth and development) should be encouraged. Some individuals possess additional certification beyond that which is required. This should serve as an asset to our workplace and profession as a whole. I applaud the initiative shown by I.E.P. toward securing accreditation. I anticipate no issues as the EMS program moves toward fulfilling these requirements.	N/A +	This comment does not call for any changes to policy. It expresses support of proposed Policy 2325.
May 15, 2006	Sheila Walker Regional Director Staff Burlington United Methodist Family Services, Inc.	My staff and I believe Policy 2325 for High Quality Standards for Juvenile Institutional Education Programs under governance of West Virginia Board of Education and State Superintendent of Schools will be beneficial to the youth we serve. The children in our care attend school at our facility daily and are required to meet the standards set forth for them. These students should be treated the same as public school students and given the opportunity to advance in school and be prepared to reenter the public school system. Program accreditation is essential for the future of institutional education and out students. We are an advocate of Policy 2325.	N/A +	This comment does not call for any changes to policy. It expresses support of proposed policy 2325.
May 15, 2006	Cindy Largent-Hill Director Staff Division of Juvenile Services	I have contacted those Facility Administrators listed for comments. The overall consensus was complimentary of the education staff and the services offered. The only comment made in respect to the proposed Policy 2325 was the following: Residents that obtain a GED be allowed to receive continued educational and/or vocational programs while in the Division of Juvenile Services care and custody.	A -	Standard 3.5.13 has been amended to ensure access to educational programs for students who have earned a high school diploma or GED and are under age 21.

Date:	Individual/Organization:	Comments:	Action Type	Rationale
May 15, 2006	<p>Abigail Miklos, Principal Mark Toney, Teacher Charles Fuller, School Counselor Ann Adkins, Teacher Pearl Kessler, Teacher Carol Gilliam, Teacher Beckley Center School</p>	<p>Residents have a smooth transition into the community public school system; with extensive linkage, networking, and advocacy.</p> <p>The Division of Juvenile Services looks forward to the continued positive partnership with the Office of Institutional Education.</p> <p>§126-53-3. High Quality Standards</p> <p>3.3.15 Alignments to job markets is so broadly worded that its intent is not clear. Is it referring to local job markets or national job markets?</p> <p>3.3.18 We would need more guidance from the central office pertaining to work-based learning to meet this standard.</p> <p>3.4.1 This raises the questions of how students' mastery of content standards will be measured and will teachers be held accountable for students' lack of effective instruction prior to arrival at our facility?</p> <p>3.4.4 Does this imply the definition of program completion as a awarding of a diploma? Will this accreditation process enable us to issue diplomas from our schools? In the six years we have operated at The Beckley Center, we have not issued a single diploma, yet hundreds of students have successfully completed the program since we are a short-term program.</p>	N -	Standards 3.4.6 and 3.5.12 identify successful transition as a performance measure to evaluate program effectiveness.
			A -	<p>This standard is founded upon research-based characteristics of effective schools in institutional setting. The standard has been amended to include state and national job market opportunities.</p> <p>This comment does not request any change to policy. It is a request for guidance regarding implementation.</p> <p>This comment does not request any change to policy. It identifies an implementation issue.</p> <p>This comment does not request any changes to policy. The proposed policy does not seek authority to issue high school diplomas. OIEP students receive diplomas via the transfer of credits to the home school in the county district.</p>

Date:	Individual/Organization:	Comments:	Action Type	Rationale
		<p>3.4.6 and 3.5.12 concern the faculty because we currently do not have a way to conduct follow ups with students after discharge. It would be a full time job to track discharged students from OIEP. We currently can only track re-entry into another school upon discharge.</p>	N/A 0	This comment does not request any change to policy. It identifies an implementation issue. Follow-up is an important part of program evaluation.
		<p>3.8.11 We feel that we need more direction from the central office about the statewide physical assessment program.</p>	N/A 0	This comment does not request any change to policy. It identifies an implementation issue.
		<p>3.4.5 We would need to improve this process in order to meet this standard</p>	N/A 0	This comment does not request any changes to policy. It identifies an implementation issue.
May 15, 2006	Brian Hall Executive Director Board of Child Care	<p>§126-53-3. High Quality Standards Is it possible to address in policy how and if specifically those students who will be maintained in the juvenile facility after age 18 and have graduated or completed a GED will be educated by WVDE? This will take effect July 1.</p>	A-	Standard 3.5.13 has been amended to ensure access to educational programs for students who have earned a high school diploma or GED and are under age 21.
May 15, 2006	Host Agency Staff Board of Child Care	<p>§126-53-3. High Quality Standards May we address succinctly how the WV Student Code will affect students in Institutional Education?</p>	N -	Standard 3.8.6 addresses the applicability of the WV Student Code of Conduct.
May 15, 2006	Educational Staff Board of Child Care	<p>We at the Board of Child Care School believe that the purpose of proposed Policy 2325 reflects those things that we strive to accomplish throughout the school year.</p>	N/A +	This comment does not call for any changes to policy. It expresses support of proposed policy 2325.
May 15, 2006	Kathy Mahoney Counselor Elkins Mountain School	<p>§126-53-3. High Quality Standards 3.4.5 Career Tech Credentials: Are we certified to do this?</p>	N/A 0	This comment does not request any changes to policy. Standard 3.4.5 applies to career technical programs offering occupational skill training.

Date:	Individual/Organization:	Comments:	Action Type	Rationale
		<p>3.5.3 Counseling services: We discussed this at the counselor's meeting... I have a huge concern about meeting this standard. Is it realistic considering the amount of paper work that is required? I think 60% direct /40% paperwork is more reasonable.</p>	A -	<p>Standard 3.5.3 has been amended to state that 60% of the counselor work day will be spent in a direct counseling relationship with students, and 40 % of the work day in in counseling related administrative activities. The role of the school counselor in an institution, by necessity, requires more emphasis on counseling related administrative activities than that of a public school counselor. In addition, institutionalized students access more direct counseling services via the host agency.</p>
		<p>3.5.12 Transition follow-up – Who is going to do this? If counselors get this duty, there is more paperwork, which makes standard 3.5.3 more unattainable.</p>	N 0	<p>This comment does not request any change to policy. It identifies an implementation issue. Follow-up is an important part of program evaluation.</p>
		<p>3.7.1 Adequate facilities – We have no power over this. Larger class rooms are needed.</p>	N/A 0	<p>This comment does not call for any changes to the proposed policy. It demonstrates the need for 3.7.1 as a standard.</p>
		<p>3.8.7 Student/Teacher Ratio – We have a waiver to exceed this ratio, however, the small classrooms continue to limit us in several situations.</p>	N/A 0	<p>This comment does not call for any changes to the proposed policy. It expresses an implementation issue.</p>
		<p>3.8.11 Physical Assessment – How? Where? Who?</p>	N/A 0	<p>This comment does not request a change to policy. It requests implementation guidance.</p>
		<p>3.11.4 Orientation/Mentoring – What about your “old” employees? They should be considered since this mentoring program is necessary for permanent certification in some situations.</p>	N-	<p>Standard 3.11.4 identifies beginning teacher and principal internship programs as part of an effective and efficient school system. The internship programs referenced in the standard provide mentoring services needed for permanent certification. OIEP operational procedures will provide for the inclusion of all employees in mentoring or orientation programs where necessary.</p>

Date:	Individual/Organization:	Comments:	Action Type	Rationale
May 15, 2006	Educational Staff Barboursville School	<p>3.3.10 Elective Offerings. Are there restrictions as to the electives that can be offered and is there a process of proposal and approval for electives in OIEP?</p> <p>3.3.11 Lesson Planning. What is meant by the word "advance"? Such terms are too open for individual interpretation.</p> <p>3.3.15 Alignment with Job Market Opportunities. We need clarification as to the amount of time that is expected to be dedicated to "career-technical" training.</p> <p>3.3.18 Work-Based Learning. It may be difficult to assure all career components are present for "all" students, depending on their length of stay, emotional/mental state and the manner in which careers is incorporated within the schedule.</p> <p>3.3.19 Monitoring Student Progress. Words like "frequently" are too open to interpretation. Be more specific.</p> <p>3.3.20 Flexibility of Instruction. This seems to be a nebulous statement.</p> <p>3.4 Performance Measures for Accountability. The teachers would like to know what "measures" means.</p> <p>3.4.1 Student Achievement. How will the students demonstrate mastery of state content standards if not present for the Westest?</p>	<p>N/A 0</p> <p>N-</p> <p>N/A 0</p> <p>N/A 0</p> <p>N-</p> <p>N-</p> <p>N-</p> <p>N/A 0</p>	<p>This comment does not call for any changes to the proposed policy. OIEP will develop operational procedure outlining the approval process for offering elective courses.</p> <p>Policy 2320 provides verification procedures related to standard 3.3.11</p> <p>This comment requires no changes to the proposed policy. Policy 2510 establishes time based requirements for course offerings.</p> <p>This comment requests no changes to the proposed policy. Standard 3.3.18 may require OIEP schools to expand or modify program delivery.</p> <p>Verification procedures will be developed by the Office of Educational Performance Audits.</p> <p>Verification procedures will be developed by the Office of Educational Performance Audits.</p> <p>Accountability measures are identified in 3.4.1-3.4.6.</p> <p>This comment does not request a change to policy. It identifies an implementation issue.</p>

Date:	Individual/Organization:	Comments:	Action Type	Rationale
		<p>3.4.4 Program Completion. This needs revision. Students earn credits toward their diploma and may receive a diploma, as a result, from their home high school if appropriate. As it is written, the standard implies that OIEP awards diplomas.</p> <p>3.4.5 Career-Technical Credentials. The standard, as written, implies this will happen in all programs/schools. This is not the case and the way the standard is worded may need revision.</p> <p>3.5 Student Planning and Services. What "services" would this be?</p> <p>3.5.4 Enrollment and Transfer of Records. We might want a time-line...one week, etc.</p> <p>3.5.11 Transition Plan. Although all students need a transition plan, this standard would not include a 5-year plan for all students as it is written (6th graders, for example, would not have a 5-year plan).</p> <p>3.5.12 Transition. "Timely fashion" again is nebulous and open for interpretation.</p> <p>3.6; 3.6.1; 3.6.2 – Not all schools are Title I schools. Should the standard be written with some word that would serve as a qualifier?</p> <p>3.7.1 Adequate Facilities. "Adequate" is vague and subjective. There are policy requirements for facilities that perhaps should be referenced.</p> <p>3.8.5 Measuring Mastery. What instrument will be used to do this? If it is Westest, not all students would be in a facility when that test is administered.</p>	<p>N-</p> <p>N-</p> <p>N/A 0</p> <p>N-</p> <p>A-</p> <p>N-</p> <p>N-</p> <p>N-</p> <p>N/A 0</p>	<p>Standard 3.4.4 does not imply that a diploma may be awarded by an institutional school.</p> <p>Standard 3.4.5 applies only to career technical programs offering occupational skill training.</p> <p>Services are described in standards 3.5.1 through 3.5.13</p> <p>Time lines are established in OIEP operational procedures.</p> <p>Standard 3.5.11 has been amended to reflect that the individualized transition plan will be developed for students in accordance with Policy 2510.</p> <p>Time lines for transfer of records are established in OIEP operational procedures.</p> <p>Standards are appropriate as written.</p> <p>OIEPA verification procedures will provide guidance for determining adequacy of facilities.</p> <p>This comment does not call for changes in policy. It identifies an implementation issue.</p>

Date:	Individual/Organization:	Comments:	Action Type	Rationale
May 16, 2006	Laura Carr Science Teacher Elkins Mt. School	<p>§126-53-3. High Quality Standards</p> <p>3.5.3 Counseling Services – I feel that it is unrealistic to expect our school counselors to spend 75% of their time with our students. Scheduling new student orientation and GED testing takes up a big chunk of time and are important. Having the school counselor spend 75% of their time with students would also contribute to classroom disruptions which are already a problem due to doctor appointments, meetings, court, etc.</p> <p>3.8.11 Physical Assessment - It is out of our control that we can not participate in this. Our school does not have the appropriate facilities for the physical assessment program.</p> <p>3.11.4 Orientation and Mentoring – New teachers, as well as senior staff need to have the opportunity to participate in OIEP’s mentoring program. This shouldn’t be a program only available to new hires.</p>	A-	<p>Standard 3.5.3 has been amended to state that 60% of the counselor work day will be spent in a direct counseling relationship with students, and 40 % of the work day in in counseling related administrative activities. The role of the school counselor in an institution, by necessity, requires more emphasis on counseling related administrative activities than that of a public school counselor. In addition, institutionalized students access more direct counseling services via the host agency.</p> <p>The comment does not call for a change in policy. It identifies an implementation issue.</p> <p>Standard 3.11.4 identifies beginning teacher and principal internship programs as part of an effective and efficient school system. The internship programs referenced in the standard provide mentoring services needed for permanent certification. OIEP operational procedures will provide for the inclusion of all employees in mentoring or orientation programs where necessary.</p>
May 16, 2003	Martin Kniley Tech. Ed. Teacher Elkins Mt. School	<p>§126-53-3. High Quality Standards</p> <p>3.4.5 I don’t think we have the students long enough to issue licenses or certificates.</p>	N/A 0	<p>This comment does not call for any changes to policy. Standard 3.4.5 applies only to career technical programs offering occupational skill training.</p>

Date:	Individual/Organization:	Comments:	Action Type	Rationale
May 16, 2006	Staci Mitchell Behavior Disorder Teacher Elkins Mt. School	§126-53-3. High Quality Standards 3.11.4 This rule does not address those teachers who have provided services without mentorship "catching up" old employees is not addressed, and should be.	N-	Standard 3.11.4 establishes beginning teacher and principal internship programs as part of an effective and efficient school system. OIEP operational procedures will provide for the inclusion of all employees in mentoring or orientation programs as needed.
May 16, 2006	Steve Boyce Principal Elkins Mt. School	§126-53-1. General If the effective date is July 1, 2006, when will the accreditation process begin? How much time will we have to complete this process? §126-53-3. High Quality Standards 3.4.5 Will this be dependent on the school? This one has been difficult at EMS and I'm not sure it is possible at WVCH School. 3.5.3 This creates a contradiction in what we ask of our counselors record transfers, transcripts and other counseling-related administrative activities take up more than 25% of their time if done correctly in a timely manner. What is the priority, meeting with students 75% of the time or taking care of records in a timely manner. It will be very difficult for the counselors in our larger facilities to do both.	N/A 0 N/A 0 A-	This comment does not call for any changes to policy. Process and timelines are determined by the Office of Education Performance audits and the West Virginia Board of Education. Standard 3.4.5 applies to career technical programs offering occupational skill training. Standard 3.5.3 has been amended to state that 60% of the counselor work day will be spent in a direct counseling relationship with students, and 40 % of the work day in in counseling related administrative activities. The role of the school counselor in an institution, by necessity, requires more emphasis on counseling related administrative activities than that of a public school counselor. In addition, institutionalized students access more direct counseling services via the host agency.
		3.7 What is the definition of adequate? Is this within our umbrella of control? We are making ourselves responsible for something that is ultimately under the facility's control.	N -	OEPA verification procedures will provide guidance for determining adequacy of facilities. Adequate facilities are a characteristic of an effective and efficient school.

Date:	Individual/Organization:	Comments:	Action Type	Rationale
		<p>3.11.4 This needs to be done especially the mentorship program. We need to make sure the employees we have missed in the past have the opportunity to compete the mentorship program.</p>	N -	<p>Standard 3.11.4 establishes beginning teacher and principal internship programs as part of an effective and efficient school system. OIEP operational procedures will provide for the inclusion of all employees in mentoring or orientation programs where necessary.</p>
<p>May 16,2006</p>	<p>Francine Snyder Teacher Elkins Mt. School</p>	<p>§126-53-3. High Quality Standards</p> <p>3.3.7 Essential to good education</p> <p>3.3.18 Community service possible but job shadowing not in our situation. Hard burden to document for counselors.</p> <p>3.3.19 Don't see how this is possible in the short period we have students.</p> <p>3.5.12 Impossible unless done on the state level. Would be very beneficial to program evaluation if possible.</p> <p>3.7; 3.7.1; 3.7.2 We have no control over facilities. We can't get our trash taken out let alone facility approval.</p> <p>3.8.10 Difficult with our students.</p> <p>3.8.11 No physical education facilities</p>	<p>N/A +</p> <p>N/A 0</p> <p>N/A 0</p> <p>N/A +</p> <p>N/A 0</p> <p>N/A 0</p>	<p>This comment does not call for any changes to policy. It expresses support of proposed policy 2325.</p> <p>This comment does not call for any changes to policy. Job Shadowing is not required by the standard.</p> <p>The comment does not call for a change in policy. It identifies an implementation issue.</p> <p>The comment does not call for a change in policy. It identifies an implementation issue. Transition and follow-up are an important part of evaluation.</p> <p>This comment does not call for any changes to the proposed policy. It demonstrates the need for 3.7.1 as a standard.</p> <p>This comment does not call for any changes to policy. Parental communication is essential to effective programs.</p> <p>The comment does not call for a change in policy. It identifies an implementation issue.</p>

Date:	Individual/Organization:	Comments:	Action Type	Rationale
	Stephen J. Yachuw Elkins Mt. School	<p>§126-53-3. High Quality Standards</p> <p>3.3.14 Instructional Day. Our classes are interrupted regularly by the host agency requesting students for various meetings/appointments/treatment teams, etc.</p> <p>3.4.4. Program completion. Students completing the program here are, for the most part, returned to public school. To earn a diploma or /GED to complete the program is not realistic for the majority of our students.</p> <p>3.4.5 Career-Technical Credentials. Students are not here long enough, nor do we have the authority to, earn licenses, certificates and other credentials recognized by business and industry career technical programs.</p> <p>3.5.3. Counseling Services. To require a counselor to spend 75% of the work day in a direct counseling relationship with students and only 25% of the time in administrative activities is insane. Professional, certified counselors know what needs to be done and when to do it.</p> <p>3.5.13. Equal access. We have no facilities to meet demands of the disabled.</p>	<p>N/A 0</p> <p>N/A 0</p> <p>N/A 0</p> <p>A-</p> <p>N/A 0</p>	<p>This comment does not call for any changes to policy. A full instructional day is essential to effective programs and is required by W. Va. 126CSR42, WVBE Policy 2510, Assuring the Quality of Education: Regulations for Education Programs.</p> <p>Standard 3.4.4 identifies multiple measures for accountability. Institutionalized students not returning to public school must have an opportunity to earn a high school or GED diploma. For those students, Program Completion is a valid measure of program effectiveness.</p> <p>Standard 3.4.5 applies to career technical programs offering occupational skill trainings.</p> <p>Standard 3.5.3 has been amended to state that 60% of the counselor work day will be spent in a direct counseling relationship with students, and 40 % of the work day in in counseling related administrative activities. The role of the school counselor in an institution, by necessity, requires more emphasis on counseling related administrative activities than that of a public school counselor. In addition, institutionalized students access more direct counseling services via the host agency.</p> <p>This comment does not call for any changes to the proposed policy. It demonstrates the need for 3.5.13 as a standard.</p>

Date:	Individual/Organization:	Comments:	Action Type	Rationale
		<p>3.6. Special Education and Title I Services. Again, no facilities for the disabled.</p> <p>3.7. Facilities. The majority of the classrooms are inadequate in providing the required square feet per student ratio.</p> <p>3.7.2. Safe Facilities. The interagency agreement is out of date and not being followed in its present form. Safety hazards are not corrected in a timely manner.</p> <p>3.7.3. Interagency Agreement. Again, out of date and not followed/ maintained</p> <p>3.8.7. Student-Teacher Ratio. Guidelines are not followed.</p> <p>3.8.11. Physical Assessment. Elkins Mountain School has no facilities for an appropriate physical assessment program.</p> <p>3.11.4 Orientation and Mentoring. This facility does not have a beginning teacher internship program, and had not previously considered this requirement for those already employed at this facility.</p>	<p>N/A 0</p> <p>N/A 0</p> <p>N/A 0</p> <p>N/A 0</p> <p>N/A 0</p> <p>N/A 0</p> <p>N/A+</p>	<p>The comment does not call for a change in policy. It identifies an implementation issue.</p> <p>The comment does not call for a change in policy. It demonstrates the need for standard 3.7. Safe and adequate facilities are essential for effective programs.</p> <p>The comment does not call for a change in policy. It demonstrates the need for standard 3.7.2. Safe and adequate facilities are essential for effective programs.</p> <p>The comment does not call for a change in policy. It demonstrates the need for standard 3.7.3.</p> <p>This comment does not call for any changes to the proposed policy. It identifies an implementation issue.</p> <p>The comment does not call for a change in policy. It identifies an implementation issue.</p> <p>The comment does not call for a change in policy. It demonstrates the need for standard 3.11.4.</p>

126CSR53



REC'D MAY 16 2006

POLICY 2325: High Quality Standards for Juvenile Institutional Education Programs

COMMENT PERIOD ENDS: May 15, 2006

COMMENT RESPONSE FORM

The following form is provided to assist those who choose to comment on Policy 2325: High Quality Standards for Juvenile Institutional Education Programs. Additional sheets may be attached, if necessary.

Name : Laura Carr Organization: QJEP Elkins Mtn. School

Title: Science teacher

Street Address: 100 Bell Street

City: Elkins State: WV Zip: 26241

Please check the box below that best describes your role.

- School System Superintendent
- School System Staff
- Parent/Family
- Principal
- Teacher
- Business/Industry
- Professional Support Staff
- Service Personnel
- Community Member

COMMENTS/SUGGESTIONS
<p>§126-53-1. General.</p>
<p>§126-53-2. Purpose.</p>

§126-53-3. High Quality Standards.

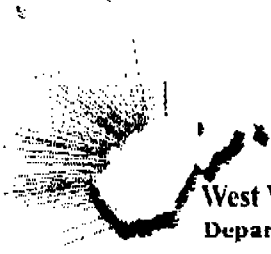
In regards to 3.5.3 Counseling Services I feel that it is unrealistic to expect our school counselors to spend 75% of their time with our students. Scheduling, new student orientation, and GED testing take up a big chunk of time and are important. Having the school counselors spend 75% of their time with students would also contribute to classroom disruptions which are already a problem due to doctor appointments, meetings, court, etc.

In regards to 3.8.11. Physical Assessment it is out of our control that we can not participate in this. Our school does not have the appropriate facilities for the physical assessment program.

In regards to 3.11.4 Orientation and Mentoring new teachers, as well as senior staff need to have the opportunity to participate in OIEP's mentoring program. This shouldn't be a program only available to new hires.

Please direct all comments to:

Frank D. Andrews, Superintendent
Office of Institutional Education Programs
West Virginia Department of Education
Capitol Building 6, Room 728
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: fandrews@access.k12.wv.us
Fax No.: (304) 558-5042.



West Virginia
Department of Education

Institutional Education Programs

Board of Child Care School

715 Brown Road

Martinsburg, WV 25401

Phone: (304) 274-3688 Fax: (304) 274-3539

FACSIMILE TRANSMITTAL SHEET

TO: Mr. Andrews FROM: Karen Palmer
 COMPANY: _____ DATE: 5-15-06
 FAX NUMBER: 558-5042 TOTAL NO. OF PAGES INCLUDING COVER: _____
 PHONE NUMBER: _____

RE: Policy 2325 - Comment Response

URGENT FOR REVIEW PLEASE COMMENT PLEASE REPLY PLEASE RECYCLE

NOTES/COMMENTS:

Please give to Mr. Andrews
ASAP - these are due
today

Thanks,
Karen

***THIS FAX CONTAINS CONFIDENTIAL INFORMATION.
PLEASE DELIVER IMMEDIATELY TO THE PERSON ADDRESSED.**



The mission of Institutional Education Programs is to prepare juveniles and adults for successful transition to school or employment and to life in their communities as responsible and productive citizens

126CSR53

POLICY 2325: High Quality Standards for Juvenile Institutional Education Programs

COMMENT PERIOD ENDS: May 15, 2006

COMMENT RESPONSE FORM

The following form is provided to assist those who choose to comment on Policy 2325: High Quality Standards for Juvenile Institutional Education Programs. Additional sheets may be attached, if necessary.

Name: Board of child care School Organization: WVDE

Title: _____

Street Address: 715 Brown Road

City: Martinsburg State: WV Zip: 25401

Please check the box below that best describes your role.

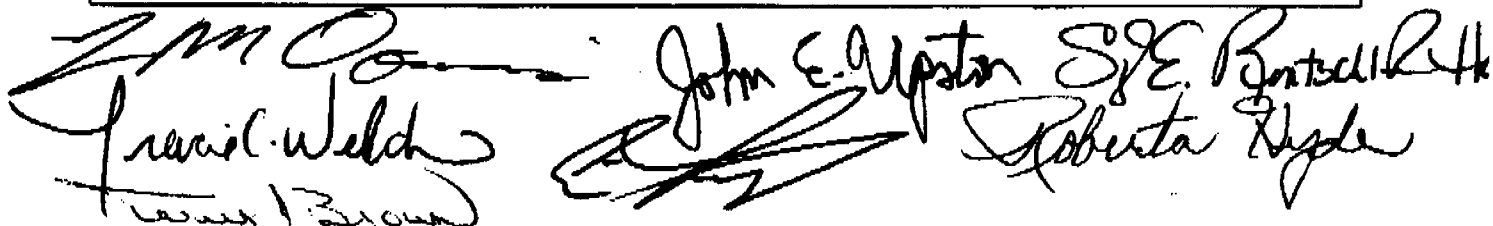
- School System Superintendent
- School System Staff
- Parent/Family
- Principal
- Teacher
- Business/Industry
- Professional Support Staff
- Service Personnel
- Community Member

COMMENTS/SUGGESTIONS

§126-53-1. General.

§126-53-2. Purpose.

We at BCC School believe that the purpose of policy 2325 reflects those things that we strive to accomplish throughout the school year.



 Francis Welch John E. Upston S/E Roberta Hyde

✓ REC'D MAY 16 2006

126CSR53

POLICY 2325: High Quality Standards for Juvenile Institutional Education Programs

COMMENT PERIOD ENDS: May 15, 2006

COMMENT RESPONSE FORM

The following form is provided to assist those who choose to comment on Policy 2325: High Quality Standards for Juvenile Institutional Education Programs. Additional sheets may be attached, if necessary.

Name: MARTIN Kniley Organization: OIEP Elkins Mt. School

Title: TECH-ED TEACHER

Street Address: 100 BELL ST.

City: Elkins State: WV Zip: 26241

Please check the box below that best describes your role.

- | | | |
|---|--|--|
| <input type="checkbox"/> School System Superintendent | <input type="checkbox"/> School System Staff | <input type="checkbox"/> Parent/Family |
| <input type="checkbox"/> Principal | <input checked="" type="checkbox"/> Teacher | <input type="checkbox"/> Business/Industry |
| <input type="checkbox"/> Professional Support Staff | <input type="checkbox"/> Service Personnel | <input type="checkbox"/> Community Member |

COMMENTS/SUGGESTIONS
§126-53-1. General.
§126-53-2. Purpose.

126CSR53

§126-53-3. High Quality Standards.

3.4.5. I do not think we have the students long enough to issue licenses or certificates.

Please direct all comments to:

Frank D. Andrews, Superintendent
Office of Institutional Education Programs
West Virginia Department of Education
Capitol Building 6, Room 728
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: fandrews@access.k12.wv.us
Fax No.: (304) 558-5042.

126CSR53



REC'D MAY 16 2006

POLICY 2325: High Quality Standards for Juvenile Institutional Education Programs

COMMENT PERIOD ENDS: May 15, 2006

COMMENT RESPONSE FORM

The following form is provided to assist those who choose to comment on Policy 2325: High Quality Standards for Juvenile Institutional Education Programs. Additional sheets may be attached, if necessary.

Name : Staci Mitchell Organization: Elkins Mt. School

Title: Behavior Disorder Teacher

Street Address: 100 Bell Street

City: Elkins State: WV Zip: 26241

Please check the box below that best describes your role.

- | | | |
|---|--|--|
| <input type="checkbox"/> School System Superintendent | <input type="checkbox"/> School System Staff | <input type="checkbox"/> Parent/Family |
| <input type="checkbox"/> Principal | <input checked="" type="checkbox"/> Teacher | <input type="checkbox"/> Business/Industry |
| <input type="checkbox"/> Professional Support Staff | <input type="checkbox"/> Service Personnel | <input type="checkbox"/> Community Member |

COMMENTS/SUGGESTIONS
§126-53-1. General.
§126-53-2. Purpose.

§126-53-3. High Quality Standards.

3.11.4

This rule does not address those teachers who have provided services without mentorship. "catching up" old employees is not addressed, and should be.

Please direct all comments to:

Frank D. Andrews, Superintendent
Office of Institutional Education Programs
West Virginia Department of Education
Capitol Building 6, Room 728
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: fandrews@access.k12.wv.us
Fax No.: (304) 558-5042.

REC'D MAY 16 2006

126CSR53

POLICY 2325: High Quality Standards for Juvenile Institutional Education Programs

COMMENT PERIOD ENDS: May 15, 2006

COMMENT RESPONSE FORM

The following form is provided to assist those who choose to comment on Policy 2325: High Quality Standards for Juvenile Institutional Education Programs. Additional sheets may be attached, if necessary.

Name: Franca Suple Organization: OIEP
Title: Teacher - Elkins J.M. School
Street Address: 100 Bell St.
City: Elkins State: WV Zip: 26941

Please check the box below that best describes your role.

- | | | |
|---|--|--|
| <input type="checkbox"/> School System Superintendent | <input type="checkbox"/> School System Staff | <input type="checkbox"/> Parent/Family |
| <input type="checkbox"/> Principal | <input checked="" type="checkbox"/> Teacher | <input type="checkbox"/> Business/Industry |
| <input type="checkbox"/> Professional Support Staff | <input type="checkbox"/> Service Personnel | <input type="checkbox"/> Community Member |

COMMENTS/SUGGESTIONS
§126-53-1. General.
§126-53-2. Purpose.

§126-53-3. High Quality Standards.

- 3.3.7 - essential to good education
- 3.3.18 - Community service possible -
but job shadowing not in our situation
Hard Burden to Document for Counselors.
- 3.4.5. Don't see how this is possible
in the short period we have students
- 3.5.12 - impossible unless done on
the state level. Would be very
beneficial to program evaluation if
possible.
- 3.7; 3.7.1; 3.7.2; The Law no control
over facilities. we can't get any track
taken out w/out facility approval
- 3.8.10 - difficult with our students.
- 3.8.11 - no physical education facilities

Please direct all comments to:

Frank D. Andrews, Superintendent
Office of Institutional Education Programs
West Virginia Department of Education
Capitol Building 6, Room 728
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: fandrums@access.k12.wv.us
Fax No.: (304) 558-5042.



126CSR53

REC'D MAY 16 2006

POLICY 2325: High Quality Standards for Juvenile Institutional Education Programs

COMMENT PERIOD ENDS: May 15, 2006

COMMENT RESPONSE FORM

The following form is provided to assist those who choose to comment on Policy 2325: High Quality Standards for Juvenile Institutional Education Programs. Additional sheets may be attached, if necessary.

Name: Stephen J. Yachw Organization: Elkins Mountain School

Title: Social Studies Teacher

Street Address: 100 Bell Street

City: Elkins State: WV Zip: 26241

Please check the box below that best describes your role.

- | | | |
|---|--|--|
| <input type="checkbox"/> School System Superintendent | <input type="checkbox"/> School System Staff | <input type="checkbox"/> Parent/Family |
| <input type="checkbox"/> Principal | <input checked="" type="checkbox"/> Teacher | <input type="checkbox"/> Business/Industry |
| <input type="checkbox"/> Professional Support Staff | <input type="checkbox"/> Service Personnel | <input type="checkbox"/> Community Member |

COMMENTS/SUGGESTIONS

§126-53-1. General.

NONE

§126-53-2. Purpose.

NONE

§126-53-3. High Quality Standards.

3.3.14 Instructional Day. Our classes are interrupted regularly by the host agency requesting students for various meetings/appointments/treatment teams, etc.

3.4.4. Program completion. Students completing the program here are, for the most part, returned to public school. To earn a diploma or GED to complete the program is not realistic for the majority of our students.

3.4.5. Career-Technical Credentials. Students are not here long enough, nor do we have the authority to, earn licenses, certificates and other credentials recognized by business and industry career technical programs.

3.5.3. Counseling Services. To require a counselor to spend 75% of the work day in a direct counseling relationship with students and only 25% of the time in administrative activities is insane. Professional, certified counselors know what needs to be done and when to do it.

3.5.12. Transition.

3.5.12. Equal Access. We have no facilities to meet demands of the disabled.

3.6. Special Education and Title 1 Services. Again, no facilities for the disabled.

Please direct all comments to:

Frank D. Andrews, Superintendent
Office of Institutional Education Programs
West Virginia Department of Education
Capitol Building 6, Room 728
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: fandrums@access.k12.wv.us
Fax No.: (304) 558-5042.

§126-53-3. High Quality Standards.

3.7. Facilities. The majority of the classrooms are inadequate in providing the required square feet per student ratio.

3.7.2. Safe Facilities. The interagency agreement is out of date and not being followed in its present form. Safety hazards are not corrected in a timely manner.

3.7.3. Interagency Agreement. Again, out of date and not followed/maintained.

3.8.7. Student-Teacher Ratio. Guidelines are not followed.

3.8.11. Physical Assessment. Elkins Mountain School has no facilities for an appropriate physical assessment program.

3.11.4. Orientation and Mentoring. This facility does not have a beginning teacher internship program, and had not previously considered this requirement for those already employed at this facility.

Please direct all comments to:

Frank D. Andrews, Superintendent
Office of Institutional Education Programs
West Virginia Department of Education
Capitol Building 6, Room 728
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: fandrews@access.k12.wv.us
Fax No.: (304) 558-5042.



POLICY 2325: High Quality Standards for Juvenile Institutional Education Programs

COMMENT PERIOD ENDS: May 15, 2006

COMMENT RESPONSE FORM

The following form is provided to assist those who choose to comment on Policy 2325: High Quality Standards for Juvenile Institutional Education Programs. Additional sheets may be attached, if necessary.

Name : Carolyn Yokum Organization: Elkins Mtn. School
 Title: CEO
 Street Address: 100 Bell St.
 City: Elkins State: WV Zip: 26241

Please check the box below that best describes your role.

- School System Superintendent
- School System Staff
- Parent/Family
- Principal
- Teacher
- Business/Industry
- Professional Support Staff
- Service Personnel
- Community Member

COMMENTS/SUGGESTIONS	
§126-53-1. General.	<i>I applaud the initiative showing by I.E.P toward securing accreditation. I anticipate no issues as the EMS program moves toward fulfilling these requirements.</i>
§126-53-2. Purpose.	



REC'D MAY 16 2006

126CSR53

POLICY 2325: High Quality Standards for Juvenile Institutional Education Programs

COMMENT PERIOD ENDS: May 15, 2006

COMMENT RESPONSE FORM

The following form is provided to assist those who choose to comment on Policy 2325: High Quality Standards for Juvenile Institutional Education Programs. Additional sheets may be attached, if necessary.

Name : Steve Boyce Organization: EMS/WVCHS-OIEP

Title: Principal

Street Address: 125 Thistledown Ln

City: Morgantown State: WV Zip: 26508

Please check the box below that best describes your role.

- | | | |
|---|--|--|
| <input type="checkbox"/> School System Superintendent | <input type="checkbox"/> School System Staff | <input type="checkbox"/> Parent/Family |
| <input checked="" type="checkbox"/> Principal | <input type="checkbox"/> Teacher | <input type="checkbox"/> Business/Industry |
| <input type="checkbox"/> Professional Support Staff | <input type="checkbox"/> Service Personnel | <input type="checkbox"/> Community Member |

COMMENTS/SUGGESTIONS

§126-53-1. General.

If the effective date is July 1, 2006, when will the accreditation process begin? How much time will we have to complete the process.

§126-53-2. Purpose.

§126-53-3. High Quality Standards.

- 3.5.3 This creates a contradiction in what we ask of our counselors. Record transfers, transcripts & other counseling-related administrative activities take up more than 25% of their time if done correctly and in a timely manner. What is the priority, meeting with students 75% of the time or taking care of records in a timely manner. It will be very difficult for the counselors in our larger facilities to do both.
- 3.4.5 Will this be dependent on the school? This one has been difficult at EMS and I'm not sure its possible at WVCHS.
- 3.7 What is the definition of adequate? Is this within our umbrella of control? We are making ourselves responsible for something that is ultimately under the facility's control.
- 3.11.4 This needs to be done especially the mentorship program. We need to make sure the employees we have missed in the past have the opportunity to complete the mentorship program.

Please direct all comments to:

Frank D. Andrews, Superintendent
Office of Institutional Education Programs
West Virginia Department of Education
Capitol Building 6, Room 728
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: fandrums@access.k12.wv.us
Fax No.: (304) 558-5042.

Frank Andrews

From: Charlie Buell [cbuell@access.k12.wv.us]
Sent: Monday, May 15, 2006 8:46 AM
To: Frank D. Andrews
Subject: Comments on Policy 2325 from Barboursville

Frank, I am attaching a composite of questions, issues/concerns about Policy 2325 from Barboursville/Robert Shell staff. Call me if you have any questions.

Thanks
Charlie

Comment Summaries for Proposed Policy 2325
High Quality Standards for Juvenile Institutional Education Programs

From Staff at Barboursville School

3.3.10 – Elective Offerings. Are there restrictions as to the electives that can be offered and is there a process of proposal and approval for electives in OIEP?

3.3.11 – Lesson Planning. What is meant by the word “advance”? Such terms are too open for individual interpretation.

3.3.15 – Alignment with Job Market Opportunities. We need clarification as to the amount of time that is expected to be dedicated to “career-technical” training.

3.3.18 – Work-Based Learning. It may be difficult to assure all career components are present for “all” students, depending on their length of stay, emotional/mental state and the manner in which careers is incorporated within the schedule.

3.3.19 – Monitoring Student Progress. Words like “frequently” are too open to interpretation. Be more specific.

3.3.20 – Flexibility of Instruction. This seems to be a nebulous statement.

3.4 – Performance Measures for Accountability. The teachers would like to know what “measures” means.

3.4.1 – Student Achievement. How will the students demonstrate mastery of state content standards if not present for the Westest?

3.4.4 – Program Completion. This needs revision. Students earn credits toward their diploma and may receive a diploma, as a result, from their home high school if appropriate. As it is written, the standard implies that OIEP awards diplomas.

3.4.5 – Career-Technical Credentials. The standard, as written, implies this will happen in all programs/schools. This is not the case and the way the standard is worded may need revision.

3.5 – Student Planning and Services. What “services” would this be?

3.5.4 – Enrollment and Transfer of Records. We might want a time-line...one week, etc.

3.5.11 – Transition Plan. Although all students need a transition plan, this standard would not include a 5-year plan for all students as it is written (6th graders, for example, would not have a 5-year plan).

3.5.12 – Transition. “Timely fashion” again is nebulous and open for interpretation.

3.6; 3.6.1; 3.6.2 – Not all schools are Title I schools. Should the standard be written with some word that would serve as a qualifier?

3.7.1 – Adequate Facilities. “Adequate” is vague and subjective. There are policy requirements for facilities that perhaps should be referenced.

3.8.5 – Measuring Mastery. What instrument will be used to do this? If it is Westest, not all students would be in a facility when that test is administered.

POLICY 2325: High Quality Standards for Juvenile Institutional Education Programs

COMMENT PERIOD ENDS: May 15, 2006

COMMENT RESPONSE FORM

The following form is provided to assist those who choose to comment on Policy 2325: High Quality Standards for Juvenile Institutional Education Programs. Additional sheets may be attached, if necessary.

Name: Kathryn Toler Organization: OIEP (MOCC)

Title: Lead Teacher

Street Address: Mt. Olive Correctional Complex

City: Mt. Olive State: WV Zip: 25185

Please check the box below that best describes your role.

- | | | |
|---|--|--|
| <input type="checkbox"/> School System Superintendent | <input type="checkbox"/> School System Staff | <input type="checkbox"/> Parent/Family |
| <input checked="" type="checkbox"/> Principal <u>Lead Teacher</u> | <input type="checkbox"/> Teacher | <input type="checkbox"/> Business/Industry |
| <input type="checkbox"/> Professional Support Staff | <input type="checkbox"/> Service Personnel | <input type="checkbox"/> Community Member |

COMMENTS/SUGGESTIONS

'126-53-1. General.

'126-53-2. Purpose. *I feel that CEA accreditation verifies that we in adult education provide quality programming for our student. Accreditation standards serve as a guideline that compels us to perform as we are required to. Always in my mind is what I need to be doing as lead teacher and what I need to have documented to prove what I am doing. Everyone profits. I feel that this process will improve juvenile educational services and keep all facilities on the same page. Even though a school might be doing a good job at serving its students, it can always do better. Accreditation motivates us.*

REC'D MAY 0 2 2006

126CSR53

POLICY 2325: High Quality Standards for Juvenile Institutional Education Programs

COMMENT PERIOD ENDS: May 15, 2006

COMMENT RESPONSE FORM

The following form is provided to assist those who choose to comment on Policy 2325: High Quality Standards for Juvenile Institutional Education Programs. Additional sheets may be attached, if necessary.

Name: Nichols, Roy E. Organization: A.E.P., Adult, MOCC

Title: Voc. INSTR.

Street Address: _____

City: W. Olive State: WV. Zip: 25185

Please check the box below that best describes your role.

- School System Superintendent
- School System Staff
- Parent/Family
- Principal
- Teacher
- Business/Industry
- Professional Support Staff
- Service Personnel
- Community Member

COMMENTS/SUGGESTIONS

'126-53-1. General. Follows mandates for Education guidelines applicable to Adult facilities with modifications for juveniles. Coach

'126-53-2. Purpose.

REC'D MAY 02 2006

126CSR53

POLICY 2325: High Quality Standards for Juvenile Institutional Education Programs

COMMENT PERIOD ENDS: May 15, 2006

COMMENT RESPONSE FORM

The following form is provided to assist those who choose to comment on Policy 2325: High Quality Standards for Juvenile Institutional Education Programs. Additional sheets may be attached, if necessary.

Name: SMITH, DEMARCUS Organization: OJEP, ADULT, MOCC

Title: VOC, INSTRUCTOR

Street Address: _____

City: MT. OLIVE State: WV Zip: 25185

Please check the box below that best describes your role.

- School System Superintendent
- School System Staff
- Parent/Family
- Principal
- Teacher
- Business/Industry
- Professional Support Staff
- Service Personnel
- Community Member

COMMENTS/SUGGESTIONS

' 126-53-1. General.

as juvenile facilities Reads to be useful to ADULT FACILITIES as well

' 126-53-2. Purpose.



126CSR53

REC'D MAY 02 2006

POLICY 2325: High Quality Standards for Juvenile Institutional Education Programs

COMMENT PERIOD ENDS: May 15, 2006

COMMENT RESPONSE FORM

The following form is provided to assist those who choose to comment on Policy 2325: High Quality Standards for Juvenile Institutional Education Programs. Additional sheets may be attached, if necessary.

Name: STEPHEN LOGAN Organization: MOCC

Title: BUSINESS/COMPUTER TEACHER

Street Address: _____

City: _____ State: _____ Zip: _____

Please check the box below that best describes your role.

- School System Superintendent
- School System Staff
- Parent/Family
- Principal
- Teacher
- Business/Industry
- Professional Support Staff
- Service Personnel
- Community Member

COMMENTS/SUGGESTIONS
<p>' 126-53-1. General. 3.3.11 Lesson Planning. If acquisition Learning Focused strategies is to remain policy, then should not the lesson planning summary identify LFS ?</p>
<p>' 126-53-2. Purpose.</p>

REC'D MAY 0 8 2006
126CSR53

Angela
Grisso

WV Industrial Home for Youth

§126-53-3. High Quality Standards.

- 3.3.16
- Limit to Career Clusters Majors due to limited course offerings
 - 3.3.18 - impossible to job shadow / work-based learning within facility except for Culinary Arts
 - 3.4.1 - when will end of course exams be developed & by whom?
 - 3.5.9 - We need to develop more incentives - maybe line item in budget to help w/ this - need to correct flaw in WVEIS for GPA's
 - 3.8.5 - Measure mastery how? WESTEST? - what else?
 - 3.9.2 - We need this is finalized written form.
 - 3.11.5 - Staff Dev. - need to allow for outside training opportunities - not just OIEP trainings

Please direct all comments to:

Frank D. Andrews, Superintendent
Office of Institutional Education Programs
West Virginia Department of Education
Capitol Building 6, Room 728
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: fandrums@access.k12.wv.us
Fax No.: (304) 558-5042.

Grisso

REC'D MAY 03 2006

Kristina
Robinson

126CSR53

WV Industrial Home for Youth

§126-53-3. High Quality Standards.

- 3.3.1.3. Tolerance & Diversity Education: We are still using TLC curriculum to address a variety of these issues. We have yet to receive ACTS curriculum.
- 3.3.1.5. Alignment with Job Market Opportunities: Difficult to offer career-tech programs that align with employment trends. We are quite limited in electives we can offer.
- 3.3.1.7. Career Advizement: What about Career Majors we don't offer here? Do we limit them to only those offered at our facility?
- 3.3.1.8. Work-based learning: Provided for all students at "some time" in grades 9-12. How long of a time frame is the "some time"?
- 3.4.1. Student Achievement: Document mastery through WESTTEST & End of Course Exams?
- 3.5.1 Data Analysis: What data are utilized? Achievement testing? TABE?
- 3.5.7. Student Assessment & Program Planning: To what types of school-based teams is the policy referencing? SAT team would be ideal

Please direct all comments to:

Frank D. Andrews, Superintendent
Office of Institutional Education Programs
West Virginia Department of Education
Capitol Building 6, Room 728
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: fandrums@access.k12.wv.us
Fax No.: (304) 558-5042.

- 3.5.11. Transition Plans: 5 Year Plans → Do we develop these based on our curriculum (i.e., limited electives) or public school curriculum?
- 3.11.5 Staff Development: Additional opportunities for training (i.e., professional growth & development) should be encouraged. Some individuals possess additional certification beyond that which is required. This should serve as an asset to our workplace & profession as a whole.



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**ADMINISTRATIVE OFFICE/
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Burlington, WV 26710
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FAX 304-289-3903

**COMMUNITY BASED
SERVICES**

Route 3, Box 3122
Keyser, WV 26726
304-788-2342
FAX 304-788-2409

Route 3 Box 346A
Grafton, WV 26354
304-265-1338
FAX 304-265-1575

1511 Pleasant Valley Road
Fairmont, WV 26554
304-368-0030
FAX 304-368-0038

P.O. Box 370
Scott Depot, WV 25560
304-757-9127
FAX 304-757-9136

P.O. Box 358
Petersburg, WV 26847
304-257-9070
FAX 304-257-9071

P.O. Box 422
Oakland, MD 21550
301-334-1285
FAX 301-334-6352

FOUNDATION OFFICE

145 Southern Drive
Keyser, WV 26726
304-788-1953
FAX 304-788-1992

KEYSER GROUP HOME

Route 3 Box 3052
Keyser, WV 26726
304-788-5622

BECKLEY CENTER

4700 Robert C. Byrd Drive
Beckley, WV 26801
304-252-8508
FAX 304-252-3670



ACCREDITED
NATIONAL COMMISSION ON
ACCREDITATION AND
QUALITY IMPROVEMENT



REC'D MAY 15 2006

May 10, 2006

Frank D. Andrews, Superintendent
Office of Institutional Education Programs
West Virginia Department of Education
Capitol Building 6, Room 728
1900 Kanawha Boulevard, East
Charleston, WV 25305

To Whom It May Concern:

My staff and I believe Policy 2325 for High Quality Standards for Juvenile Institutional Education Programs under governance of West Virginia Board of Education and State Superintendent of Schools will be beneficial to the youth we serve. The children in our care attend school at our facility daily and are required to meet the standards set forth for them. These students should be treated the same as public school students and given the opportunity to advance in school and be prepared to reenter the public school system. Program accreditation is essential for the future of institutional education and our students.

We are an advocate for Policy 2325.

Sincerely,

Sheila Walker
Sheila A. Walker, M.S., L.S.W.
Regional Director

State of West Virginia



**DIVISION OF
JUVENILE SERVICES**



Joe Manchin III
Governor
James W. Spears
Cabinet Secretary

Office of the Director

1200 Quarrier Street, Charleston WV 25301
304-558-6029 304-558-6032 fax
Toll Free 1-800-368-2780

Cynthia Largent-Hill
Director

REC'D MAY 15 2006

May 12, 2006

Frank D. Andrews, Superintendent
Office of Institutional Education Programs
West Virginia Department of Education
Capitol Building 6, Room 728
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330

Dear Superintendent Andrews: *Frank*

The West Virginia Division of Juvenile Services is in receipt of your memorandum dated April 24, 2006, entitled "High Quality Standards for Juvenile Institutional Education Programs".

I have contacted those Facility Administrators listed for comments. The overall consensus was complimentary of the education staff and the services offered. The only comment made in respect to the proposed Policy 2325 was the following:

Residents that obtain a GED be allowed to receive continued educational and/or vocational programs while in the Division of Juvenile Services care and custody.

Residents have a smooth transition into the community public school system; with extensive linkage, networking, and advocacy.

The Division of Juvenile Services looks forward to a continued positive partnership with the Office of Institutional Education.

Sincerely,

Cindy

Cynthia Largent-Hill
Director





West Virginia
Department of Education

Institutional Education Programs

The Beckley Center
4700 Robert C. Byrd Drive)
Beckley, WV 25801

Phone: (304) 250-6570 Fax: (304) 250-6573

To: Frank Andrews, Superintendent
WVDE Office of Institutional Education Programs

REC'D MAY 15 2006

From: Abigail Miklos, Principal *am*
WVDE at The Beckley Center


Date: 5-8-06

Subject: Comments on High Quality Standards from the faculty

Please find enclosed the comments from the faculty of The Beckley Center on the proposed Policy 2325.



The mission of Institutional Education Programs is to prepare juveniles and adults for successful transition to school or employment and to life in their communities as responsible and productive citizens



REC'D MAY 15 2006

Comments from the WVDE at The Beckley Center faculty on the proposed High Quality Standards 126-53-3:

The faculty of the Beckley Center met on May 8, 2006 to review and discuss the proposed rule. Following is a summary of their comments.

3.3.15 Alignment to job markets is so broadly worded that its intent is not clear. Is it referring to local job markets or national job markets?

3.3.18 We would need more guidance from the central office pertaining to work-based learning to meet this standard.

3.4.1 This raises the questions of how students' mastery of content standards will be measured and will teachers be held accountable for students' lack of effective instruction prior to arrival at our facility?

3.4.4 Does this imply the definition of program completion as awarding of a diploma? Will this accreditation process enable us to issue diplomas from our schools? In the six years we have operated at The Beckley Center, we have not issued a single diploma, yet hundreds of students have successfully completed the program since we are a short-term program.

3.4.6 and 3.5.12 concern the faculty because we currently do not have a way to conduct follow ups with students after discharge. It would be a full time job to track discharged students from OIEP. We currently can only track re-entry into another school upon discharge.

3.8.11 We feel that we need more direction from the central office about the statewide physical assessment program.

3.11.4 We would need to improve this process in order to meet this standard.

REC'D MAY 15 2006

West Virginia
Department of Education

Institutional Education Programs

The Beckley Center
4700 Robert C. Byrd Drive)
Beckley, WV 25801
Phone: (304) 250-6570 Fax: (304) 250-6573

The following OIEP employers attended a special staff meeting on Monday May 8, 2006. The purpose of the meeting was to review and discuss the Proposed Rule: 126 High Quality Standards for Juvenile Institutional Education Programs. (2325) The faculty of the WVDE school at The Beckley Center has been given the opportunity to make comments on the Proposed Rule.

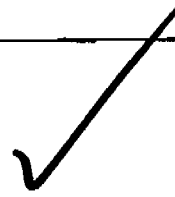
<i>Abigail Miklos</i>	<i>Principal</i>
<i>Mark J. Inney</i>	<i>Teacher</i>
<i>Charles Miller</i>	<i>School Counselor</i>
<i>Ann M. Atkins</i>	<i>Teacher</i>
<i>Pearl M. Kessler</i>	<i>Teacher</i>
<i>Carol J. Hillman</i>	<i>Teacher</i>



The mission of Institutional Education Programs is to prepare juveniles and adults for successful transition to school or employment and to life in their communities as responsible and productive citizens

126CSR53

REC'D MAY 15 2006

§126-53-3. High Quality Standards.

Mr. Brian Hall, Executive Director at the Board of Child Care facility makes the following comment:

Is it possible to address in policy how and if specifically those students who will be maintained in the juvenile facility after age 18 and have graduated or completed a GED will be educated by WVDE? This will take effect July 1.

BCC Staff:

May we address succinctly how the WV Student Code of Conduct will effect students in Institutional Education?

Please direct all comments to:

Frank D. Andrews, Superintendent
Office of Institutional Education Programs
West Virginia Department of Education
Capitol Building 6, Room 728
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: fandrrews@access.k12.wv.us
Fax No.: (304) 558-5042.



REC'D MAY 16 2006

126CSR53

POLICY 2325: High Quality Standards for Juvenile Institutional Education Programs

COMMENT PERIOD ENDS: May 15, 2006

COMMENT RESPONSE FORM

The following form is provided to assist those who choose to comment on Policy 2325: High Quality Standards for Juvenile Institutional Education Programs. Additional sheets may be attached, if necessary.

Name: Kathy Mahoney Organization: OIEP / Elkins Mt
 Title: Guidance Counselor
 Street Address: 100 Bell St
 City: Elkins State: WV Zip: 26241

Please check the box below that best describes your role.

- | | | |
|---|--|--|
| <input type="checkbox"/> School System Superintendent | <input type="checkbox"/> School System Staff | <input type="checkbox"/> Parent/Family |
| <input type="checkbox"/> Principal | <input type="checkbox"/> Teacher | <input type="checkbox"/> Business/Industry |
| <input type="checkbox"/> Professional Support Staff | <input type="checkbox"/> Service Personnel | <input type="checkbox"/> Community Member |

COMMENTS/SUGGESTIONS
§126-53-1. General.
§126-53-2. Purpose.

§126-53-3. High Quality Standards.

3.4.5 - Career Tech Credentials: Are we certified to do this?

3.5.3 - Counseling services: We discussed this at the counselor meeting... I have a huge concern about meeting this standard. Is it realistic considering the amount of paperwork that is required? I think 60% Direct / 40% paperwork is more reasonable.

3.5.12 - Transition follow up - Who is going to do this? If counselors get this duty, there is more paperwork which makes standard 3.5.3 more unattainable.

3.7.1 - Adequate Facilities - We have no power over this. Larger classrooms are needed.

3.8.7 - Student / Teacher Ratio - We have a waiver to exceed this ratio, however the small classrooms continue to limit us in several situations

3.8.11 - Physical Assessment - HOW? WHERE? WHO?

3.11.4 - Orientation / Mentoring - What about our "old" employees? They should be considered since this mentoring program is necessary for permanent certification in some situations.

Please direct all comments to:

Frank D. Andrews, Superintendent
 Office of Institutional Education Programs
 West Virginia Department of Education
 Capitol Building 6, Room 728
 1900 Kanawha Boulevard, East
 Charleston, West Virginia 25305-0330
 E-Mail Address: fandrums@access.k12.wv.us
 Fax No.: (304) 558-5042.