



January 24, 2013

DC State Board of Education
441 4th Street, NW
Washington DC 20001

Re: Proposed Graduation Requirements

Dear Members of the DC State Board of Education:

We understand that you have received a letter dated January 22, signed by seven leaders of public charter high schools along with the Chancellor of DC Public Schools (DCPS), who together represent close to 100% of DC's graduates. The letter contains thoughtful, detailed comments on the proposed graduation requirements and how, if approved, they would actually prevent students from taking advanced academic classes. PCSB urges the DC State Board of Education (SBOE) to modify the proposed graduation requirements to reflect the points made in this letter.

As a reminder, D.C. public charter schools are publicly funded schools in the District, but are not part of DCPS.¹ Pursuant to the School Reform Act, public charter schools (1) "exercise exclusive control over [their] expenditures, administration, personnel, and instructional methods;" and (2) are "exempt from District of Columbia statutes, policies, rules, and regulations established for the District of Columbia public schools" except as otherwise provided in the school's charter or the Act.² As the District's only eligible chartering authority, PCSB is responsible for monitoring the operations of public charter schools and ensuring, among other things, that they comply with applicable laws and the terms of their charters.³

The Act is also clear on the application of duplicate or conflicting provisions in the law that apply to charter schools. The Act specifically states that "no provision of any law regarding the establishment, administration, or operation of public charter schools in the District of Columbia shall apply with respect to a public charter school or an eligible chartering authority to the extent that the provision duplicates or is inconsistent with any provision of this chapter."⁴

¹ See D.C. Code §38-1800.02 (29).

² D.C. Code §38-1802.04 (c)(3).

³ See D.C. Code §38-1802.11.

⁴ D.C. Code §38-1802.10 (d).

Consistent with these provisions, PCSB reviews high school student transcripts and oversees the granting of diplomas by DC public charter schools.

PCSB is well aware of the advantages to the District of schools adhering to a common set of graduation expectations. For this reason, PCSB has historically elected to use the graduation requirements set by the SBOE as its default graduation requirements. All public charter high schools are subject to these graduation requirements unless their PCSB-approved charters specifically describe different criteria for earning a diploma.

To date no charter school has sought a charter or charter amendment that would establish different criteria for graduation. Should a school seek different criteria, PCSB would need to weigh the school's rationale for such criteria against the broader interest in consistency across all District schools. Were the new state graduation requirements to be adopted in their current form, PCSB is concerned that many charter schools would seek charter amendments to establish different graduation criteria.

PCSB therefore respectfully requests that the State Board make every effort to consider the concerns expressed by the charter high schools and DCPS, and to find meaningful ways to address their considered objections to aspects of the proposed policy.

Sincerely,



Brian Jones
Chairman
DC Public Charter School Board

Attachment: Letter to the SBOE from DCPS and Charter Leaders



Friendship
Public Charter School



R.I. HAYNES
PUBLIC CHARTER SCHOOL



THE NEXT
STEP
PUBLIC CHARTER SCHOOL



KIPP DC
Smart Schools. Proven Results. ©



WASHINGTON LATIN
PUBLIC CHARTER SCHOOL



CESAR CHAVEZ
PUBLIC CHARTER SCHOOL



THURGOOD MARSHALL
ACADEMY

DISTRICT OF COLUMBIA
PUBLIC SCHOOLS

January 22, 2013

Dear Members of the State Board of Education:

We are writing this letter in response to the Board’s proposed graduation requirements published on December 19, 2012. We, the undersigned, represent nearly 100 percent of diploma granting schools and we have come to consensus on the positions below. As practitioners, we commend the Board efforts to ensure District of Columbia high school graduates are academically prepared for college and the workplace. We believe there are several proposed changes that make positive strides toward that goal. However, we also have concerns about several of the proposed requirements. Most specifically, we object to the increase of overall credit requirements, physical activity requirements and the addition of a senior thesis. We have provided comprehensive comments about each of the proposed changes below.

Positive Changes and Clarification of Current Requirements

Removal of “Carnegie Unit” from the graduation requirements allows flexibility. The Carnegie Foundation developed the “standard unit” in 1906 as an internal eligibility measure for the colleges participating in its pension fund. For a college to be eligible for the pension, entering freshmen had to each have 14 courses of 120 hours contact time with a teacher. This antiquated measure of high school coursework tells us little about whether a student has mastered standards or truly become proficient in the skills needed to be college and career ready. We are encouraged that the Board has created flexibility to begin competency-based approaches to awarding units.

We are also encouraged by the Board’s inclusion of certain illustrations of authentic experiences (e.g. study abroad) for which LEAs may consider awarding credit. In order to move toward competency-based pathways the Board is right to allow some portion of the requirements to be met outside of contact time with a teacher. However, while these types of authentic experiences are important for becoming well-rounded students, they are not related to academic standards. For this reason, we urge the Board to consider differentiating between the use of “competency based” and other types of “authentic experiences” that may be unrelated to mastery of standards.

Clarifying Algebra I in the math requirements helps schools. The current requirements are not explicit about how schools should treat Algebra I course work for graduation. While we recognize a real need to clarify the language in the current math requirements, we are suggesting alternative language that we hope accomplishes SBOE’s goals while providing clear guidance to LEAs. We recommend revising this section to the following:

“A series of courses that satisfy the minimum learning expectations for all students as delineated in the College and Career Readiness Standards that are encompassed by the high school portion of the Common Core State Standards for Mathematics. Mathematics credit may not be awarded for courses that focus on mathematics less rigorous than the high school portion of the Common Core State Standards for Mathematics.”

This language, modeled after the state of Hawaii’s requirements, accomplishes several important improvements:

1. It provides flexibility for LEAs to choose to implement either of the recommended course sequences in the Common Core State Standards for Mathematics (CCSSM): traditional (e.g., Algebra I, Geometry, Algebra II) or integrated (e.g., Math 1, Math 2, Math 3). By focusing on the standards rather than particular course titles, this new language honors the flexibility trumpeted by the CCSSM.
2. In the second sentence, the proposed language ensures that the 4.0 credits in mathematics will be aligned to college-and-career readiness expectations by not allowing sub-high school level courses to count for high school credit. For example, pre-Algebra or Basic Math could not satisfy the requirement.
3. By not explicitly requiring Algebra I to appear on a transcript, as the current requirements do, LEAs will no longer have to force students who are ready to thrive in AP Calculus to instead enroll in an Algebra I class. This currently happens when students transfer from other states or countries that use an integrated math approach, or when students' middle schools taught Algebra I but did not grant high school credit on a student transcript.

Because most, if not all, LEAs will create three courses (3.0 credits) that cover the high school portion of the CCSSM, students will still have to earn a fourth credit in mathematics. The proposed language is intended to allow credit for courses that are high school level (i.e., not below Algebra I). We agree that students who are interested in selective colleges or STEM majors and careers should take a fourth course above Algebra II/Math 3 (i.e., courses that address the additional standards marked by a “+” in the CCSSM). But we do not believe all students must take such courses (e.g., AP Calculus) to graduate high school. In addition to traditional upper level math courses, LEAs should create other rigorous mathematics electives, perhaps including courses focused on the application of CCSSM to real-world problems.

Increasing flexibility in the Social Studies requirements is beneficial to students. We support the proposed changes to the Social Studies requirements, which will shift from 4.0 credits of specific, required courses (a total of five courses) to 2.5 credits of required courses (three courses) and 1.5 credits of electives in Social Studies. This provides LEAs and their students with exciting new flexibility to create rigorous, relevant and engaging courses, which may explore interdisciplinary connections, expose students to other Social Studies disciplines such as economics, sociology, or psychology, and/or go deep into a particular topic in the manner of a college seminar. Of course, LEAs that prefer a more traditional course sequence can still require that of their students. The one note of concern is about the implications for the District's Social Studies learning standards as we reduce World History from 2.0 to 1.0 required credits. The Board may want to review the World History standards and coverage across the K–12 spectrum, especially in light of the national conversation taking place about possible Common Core State Standards in Social Studies.

Clarifying Foreign Language requirements is necessary. We support the proposed change to the World Language requirement from just 2.0 credits to 2.0 credits in the same language. Some LEAs have already been requiring this of their students, and it aligns with the general preference for depth over breadth in preparing students for postsecondary success. That said, there are two situations in which this new requirement might prove problematic unless there was some flexibility built in either to the graduation requirement

itself or in implementing regulations under consideration by OSSE. First, some students may struggle to pass second-level world languages due to certain language processing disabilities, which make mastering world languages impossible even with appropriate accommodations and modifications. Second, given the transient nature of our high school students, there may be 12th-grade students who transfer from one school having taken the first course of one language (e.g., French I) to another school that does not offer the second course of that same language (e.g., French II). Forcing such a student to start over with a new language (e.g., Spanish I and then Spanish II) would likely make it impossible for such as student to graduate on-time despite having earned all other required credits. The LEAs encourage SBOE and/or OSSE to consider how to introduce sufficient flexibility to accommodate these two situations while still requiring the vast majority of students to complete two courses in the same world language.

Negative Changes to Current Requirements

Along with these positive changes, we want to call the Board's attention to the concerning consequences of raising the credit requirement to 26.0 hours by adding an additional credit or performing arts and physical education. Raising the overall credit requirements does little to increase the rigor of high school offerings and there are several direct implications on student course sequence, staffing, scheduling, and funding that should be considered.

Increasing credit hours actually reduces academic rigor. Increasing course requirements will negatively impact the lowest and highest performing students. In 2012, 43% of DC students were proficient in math and reading in the 10th grade. These results indicate the dire need for many students to take support math and reading classes in 9th and 10th grade across all high schools. Such students often enroll in reading and math workshops in early grades that count towards elective credits. Without these academic support classes, such students would fall even farther behind in college and workforce readiness and would often be the first to drop-out of high school rather than graduate. Conversely, students on the other side of the spectrum who are eager for advanced course will enroll in Advanced Placement (AP) courses such as AP Spanish, AP English Literature, AP Biology, AP US Government, AP Economics, or AP Psychology. Many high schools “double-block” these AP courses to allow students additional classroom time to master course material. The additional contact time is counted as elective credit in high schools and leads directly to increased passage rates on the AP exams. Likewise, some students enroll in AP courses beyond the graduation requirement such as AP Calculus, AP Human Geography, or AP Computer Science which do not count for any general requirements under the current graduation requirements. The current proposal dictates such students enroll in performing arts or physical education courses in lieu of AP courses, as taking both AP Calculus and an additional year of physical education would not be possible due to credit hours offered in a four year sequence. We do not believe it is the intent of the Board for students to enroll in additional physical education or performing arts courses and thereby reduce the rigor of a student's course of study by eliminating the ability to enroll in AP courses for the student; it is nonetheless a practical consequence of the increased credit hours. It is important to note, however, that while reducing the elective credit requirement in the proposed graduation requirements may appear on the surface to be an easy solution to the credit hour issue, the students discussed above will directly suffer from such proposals.

Increasing credit hours mandates uniform high school scheduling. Currently, high schools in the District offer anywhere from six to eight periods per school year which allow

students to earn between 24 and 32 credits over a four year sequence. By increasing the credit requirement to 26, all high schools will be forced to adopt a four-by-four schedule which allows for 32 courses to be taken over four years. Even a seven period schedule resulting in 28 hours would not be in the best interest of students as this leaves little room for remediation courses or course recovery for students who fail a course. Anything short of the four-by-four may jeopardize students' ability to graduate in four years and ability to demonstrate college and workforce readiness. Schools currently not utilizing a four-by-four will have to institute a new schedule by next September to accommodate incoming freshman if the proposal passes in its current state. Such a drastic change to schools' schedules will directly impact budgeting and staffing plans with very limited time for high schools or students to adapt. Schools will have to devise new master schedules, devise new staffing plans, implement professional development for block teaching, and revise curriculum to align with course time. Such changes require much more extensive planning than one summer as currently allotted.

Increasing credit hours impacts funding and facilities. The proposal calls for increases in performing arts and physical education. It is important to note that these two subject areas more than any other courses offered in a high school have specific facility and equipment requirements.

Facilities: Most high schools do not have the facilities to offer additional courses in these areas and students would instead be subject to subpar offerings that would result in physical education classes being conducted in classroom space equipped for an English class and not physical activity. Classes in performing arts (including music and art) require soundproofing, large studio spaces, art tables, and/or technology equipment for digital media classes. Like PE, students would be subjected to taking additional art classes in classroom not equipped for the courses. From a facilities perspective, the policy will create two sets of students in the building – those with access to quality gyms, music, and art rooms and those who sit in a math class in traditional student desks attempting to stretch in the limited space or attempting to position a keyboard on a desk meant to hold a textbook, not musical instruments.

Supplies/Equipment: Both types of courses require extensive equipment (e.g. music instruments, art supplies, digital media technology, or physical education equipment) and supplies to adequately offer quality courses. Currently, schools do not have funding for this type of equipment and supplies. As a result, students would be subject to courses without necessary tools and space contradicting the spirit of increasing such requirements.

Staffing: Increasing art and/or physical education requires additional full-time teachers (FTEs) at schools that would directly impact budgeting. A high school of 400-500 students employs one each of art, music and physical education teachers, all three of whom teach 120 – 200 students per semester. An increase in one credit hour in any of these subjects requires the addition of one FTE, which is not currently funded by the proposal.

Requiring 225 minutes of physical activity for graduation is problematic. Section 402 of the Healthy Schools Act prescribes that *middle schools* provide an average of 225 minutes of physical activity per week by 2014-2015. The section does not consider high school students. We agree that students should be engaged in physical activity at all points of education, but the benefits of making it a graduation requirement do not outweigh the costs. Administering a

tracking program for that level of detail of activity, especially if independent of an organization like a sports team, would be extremely burdensome. Tracking and certifying physical activity is more difficult than community service and would be susceptible to fraudulent submissions for credit.

Adding a Senior Thesis requirement will not increase rigor for all students. The LEAs strongly prefer for this not to be added as a graduation requirement, for several reasons. First and foremost, LEAs are still at the very beginning of implementing the CCSS both in ELA and Mathematics. As the Board is well aware, nothing is more important for preparing our students than to get the Common Core right. We are concerned that adding a Senior Thesis requirement will distract from the very hard work of implementing the CCSS, including curriculum design, professional development, student support, assessment and a host of other implementation challenges. Once we feel confident about the CCSS implementation, perhaps a few years into the administration of the PARCC assessments, we could revisit this proposal in a future revision to the requirements. But imposing this now—just as we are rolling out the new standards and with the cohort of students whose on-time graduation is the focus of Raise DC, OSSE and DCPS’s strategic goal-setting—is not a wise choice.

Second, implementing the CCSS with fidelity will already accomplish much of what the proposal for a Senior Thesis promises. CCSS contain writing standards that raise the level of rigor and college-preparedness compared to our former ELA standards. In addition, history/social studies, science and technical subjects likewise now must integrate a parallel set of writing standards. These standards contain within them the key components of any capstone/thesis requirement, including research, argument and publication. The Common Core State Standards were built upon an agreed-upon vision of college-and-career readiness.

Third, although we do not promote policies that cater to the lowest common denominator, as a practical matter, a capstone requirement is likely to devolve into a compliance/check-the-box exercise in too many instances, especially when you consider the prospect of a student who has met all other graduation requirements. A rigorous, engaging, well-executed senior thesis project is closely aligned with preparation for postsecondary success. Some LEAs/schools have already incorporated a capstone project, such as Cesar Chavez and School Without Walls. But in every successful implementation of a senior thesis requirement, two conditions are present: (i) a school community that puts the thesis at the very center of the instructional vision for the school; and (ii) a substantial investment in time, energy and resources. To the latter point, most successful implementations involve a standalone course, which has budget, staffing and scheduling implications for schools forced into adopting a thesis program. Rather than impose this across-the-board and with such high stakes for individual students, we would prefer to focus on the rigorous writing requirements of the Common Core to ensure students are producing substantial works of thought and research. Alternatively, the Board may wish to consider different diploma types with different distinctions (e.g. Standard, Advanced and Distinguished). Such a move would allow for schools to incorporate pathways that might include a meaningful capstone or thesis project without creating system-wide requirements.

The LEAs represented below sincerely thank the Board for its efforts to clarify current requirements and create flexibility for our students. We hope you will consider our comments as you move forward with your consideration of the proposed changes.

Sincerely,

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