



## MEMORANDUM

TO: Mark Jones  
President, D.C. State Board of Education

FROM: Jesús Aguirre  
State Superintendent of Education

DATE: December 12, 2014

SUBJECT: Responses to State Board of Education (SBOE) Questions on Proposed Graduation Regulations

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The Office of the State Superintendent of Education (OSSE) thanks the State Board of Education (SBOE) for its insightful questions in response to prior presentations, discussions, and communication with SBOE members on the proposed Graduation Regulations. The following responses further clarify the changes to the current Graduation Regulations.

### 1) What is OSSE's vision for why these policy changes are necessary?

OSSE's vision is to ensure all students graduate from high school college and career ready. OSSE defines college and career readiness as "the level of preparation a student needs in order to enroll and succeed – without remediation – in credit bearing course at a post-secondary institution that offers a baccalaureate degree or transfer to a baccalaureate program, or in a high-quality certificate program that enables students to enter a career pathway with potential future advancement."<sup>1</sup> The proposed Graduation Regulations focuses the District's efforts to realize that vision by better responding to students' needs, personalizing learning, and providing innovative pathways for all students to earn a high school diploma.

Currently, in the District:

- 25% of high school students in the District are immediately disengaged by the end of their first year. Immediately disengaged means they have fallen off track immediately and are most likely to have high suspensions and system involvement;
- Only 40% of high school students in the District are college-bound;
- Even among schools graduating more than 60% of their students, some schools send fewer than 10% to 4-year colleges;

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<sup>1</sup> OSSE has adopted Dr. David Conley, CEO of the Educational Policy Improvement Center (EPIC), definition of college- and career-readiness.



- 30% of DC students do not start and end high school in the same school. Mobile students are less likely to graduate. Each high school change reduces students chances of graduating on time by 10 percentage points on average; and
- A student who has failed English or math in grade 8 has an on-time graduation rate of 35%.<sup>2</sup>

The current regulations governing graduation in the District require that students earn 24 Carnegie Units to obtain a high school diploma. Established in 1906, the Carnegie Unit is strictly a time-based measure of educational investment. In the District, a Carnegie Unit is equal to 120 hours of seat time, which is usually the equivalent of a year-long course. Because of the seat time requirement, our current regulatory framework presents challenges for Local Education Agencies (LEAs) to implement meaningful innovation, such as technology driven and experiential education. Further, education experts across the country have provided research-based evidence that traditional Carnegie-based classrooms are not meeting the needs of all students.<sup>3</sup> Research has proven that students learn at different rates and in different ways with different subjects. While useful for management purposes, such as scheduling students and staff, the value of seat time as an accurate measure of student learning is limited. Accordingly, students need to be provided high-quality learning experiences from a diverse menu of learning platforms that are flexible and adaptive to ensure that all students are successfully prepared for college and career. The Carnegie structure focuses on inputs (seat-time) as opposed to the actual results of learning. Therefore, a diploma based on earned Carnegie Units does not reflect readiness for college and careers, but rather a completion of seat-time requirements.

Thus, to ensure all District students graduate college and career ready, the proposed Graduation Regulations remove a policy barrier allowing greater flexibility while creating imprimatur of quality through the following goals:

1. To encourage and support the creativity of local education agencies as they develop and expand high-quality educational experiences that are an integral part of secondary education in the evolving 21st Century classroom;

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<sup>2</sup> Graduation Pathway Report (September 2014). District of Columbia Deputy Mayor for Education. [http://dme.dc.gov/sites/default/files/dc/sites/dme/publication/attachments/DME\\_GradPathways\\_FinalReport\\_20140924\\_vF.pdf](http://dme.dc.gov/sites/default/files/dc/sites/dme/publication/attachments/DME_GradPathways_FinalReport_20140924_vF.pdf)

<sup>3</sup> See Schlosser, C. & Watkins, R. (2002) Moving Past Time as the Criteria: The Application of Capabilities-Based Educational Equivalency Units in Education. *Online Journal of Distance Learning Administration*. <http://home.gwu.edu/~rwatkins/articles/ojdlA.PDF>; Laitinen, A. (2012). *Cracking the Credit Hour*. New America Foundation and Education Sector.; Farrington, C. and Small, M. (2008) *A New Model of Student Assessment for the 21st Century*. Washington DC: American Youth Policy Forum. <http://www.aypf.org/documents/ANewModelofStudentAssessmentforthe21stCentury.pdf>; Wellman, J. and Ehrlich, T. (2003). Chapter 9: The Credit Hour, The Tie That Binds. *How the Student Credit Hour Shapes Higher Education*. <http://competencyworks.pbworks.com/w/file/fetch/67261922/WellmanEhrlichExcerpt.pdf>;



2. To ensure that all students graduate with the knowledge, skills, and work habits that will prepare them for postsecondary education and modern careers; and
3. To allow students multiple, equally rigorous and valued ways to demonstrate competency of the knowledge and skills necessary for postsecondary education and meaningful careers.

**2) How will the course flexibility proposals improve student achievement along with college, career, and civic readiness?**

There are many driving forces for advancing the course credit flexibility in the District, including the adoption of the common core state standards, the implementation of PARCC, the adoption of the college and career readiness standards, and a renewed focus on competency based learning. Course credit flexibility will remove policy barriers and introduce flexibility that will enable the District to place students at the center of the learning process. Placing students at the center of the learning process allows for demonstration of content mastery and support for innovative student learning opportunities and experiences which leads to greater student achievement.

Ultimately, OSSE wants students to graduate from high school ready to be successful, without a need for remediation, in whatever postsecondary option the student chooses to pursue. This is the basis for OSSE's efforts to allow greater credit flexibility by shifting the District's focus from evaluating student learning based on an obsolete notion of "seat time" to directly assessing students' academic performance, competence, and mastery.

**3) Are LEAs going to be able to decide what is rigorous for themselves?**

OSSE is not changing content standards but rather opening up more options for the way students can meet them. Thus, given the fact that OSSE is not proposing any changes to the content standards, LEAs will be expected to maintain the current level of rigor under the current structure.

Furthermore, the application process for the competency based learning pilot ensures rigor and accountability. OSSE's application process will guarantee that rigorous standards are maintained and that students meet these standards no matter the setting in which the learning takes place. Especially given the mobility of our students in the District and the need for credit to transfer from school to school, having the LEAs submit applications to OSSE for approval of a competency based learning course is a quality assurance that the level of rigor in a course at one school is substantially equal to the level of rigor in another school.



**4) What evidence is available to show that these policies have proven effective elsewhere?**

Currently 40 states have policies that provide school districts with some flexibility in awarding credit to students based on mastery of content and skills as opposed to seat time. As displayed in the table below, the District is currently one of the few states that has not abolished the use of the Carnegie Unit or provided any flexibility to LEAs, whether through a waiver or a more comprehensive flexibility option.

**Table 1: Course Credit Policies Across the United States**

<u>Carnegie Unit Abolished.</u> <u>Credits Awarded based on mastery of content and skills</u> (2 states)	<u>Seat Time OR another method to award credit</u> State allows Districts to use seat time or other measure to award credit (34 states)		<u>Waiver</u> State requires Carnegie Unit. State also allows for some flexibility but requires a Waiver application completed by student, school, or LEA. (3 states)	<u>Very Limited Flexibility</u> State requires Carnegie Unit but also allows for some limited flexibility (6 states)	<u>Carnegie Unit Only</u> State requires Carnegie Unit and does not provide any other option. (7 states)
New Hampshire  Maine ( <i>beginning 2018 all diplomas must be proficiency based</i> )	Alaska Arizona California Colorado Connecticut Florida Hawaii Idaho Indiana Iowa Kentucky Maryland Michigan Minnesota Mississippi Missouri Montana	Nevada New Jersey New Mexico New York Ohio Oklahoma Oregon Pennsylvania Rhode Island South Dakota Texas Utah Vermont Washington Wisconsin Wyoming	Louisiana South Carolina West Virginia	Alabama ( <i>Credit Recovery</i> ) Arkansas ( <i>only for Charter &amp; Schools of Innovation</i> ) Delaware ( <i>not for core courses</i> ) Georgia ( <i>CBL for Alternative/Nontraditional</i> ) Kansas ( <i>unusual circumstances</i> ) North Carolina ( <i>special circumstances</i> )	District of Columbia Illinois Massachusetts Nebraska North Dakota Tennessee Virginia

OSSE has engaged with LEAs, SBOE members, community members and conducted extensive research to develop the proposed Graduation Regulations and specifically Course Credit Flexibility. Additionally, in developing this plan<sup>4</sup>, OSSE looked to the effectiveness of each

<sup>4</sup> The District's plan for multiple pathways of credit attainment is modeled after Ohio. In 2010, Ohio implemented a Plan for Credit Flexibility, where the Ohio Department of Education retained the Carnegie Unit, while providing students with options for demonstrating subject area competency and earning credit. With Credit Flexibility, high school students in Ohio can earn credit in three ways, or in a combination of these ways: (1) by completing traditional coursework; (2) by testing out or otherwise demonstrating mastery of the course content; or (3) by



component of Course Credit Flexibility Plan – credit recovery<sup>5</sup>, credit advancement<sup>6</sup>, and competency based learning<sup>7</sup> – in various states.

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pursuing one or more “educational options” (e.g., distance learning, educational travel, independent study, an internship, music, arts, afterschool program, community service or engagement project and sports).

<sup>5</sup> Credit Recovery is making a positive impact in a number of states, including Florida, Texas, Michigan, and Oregon. *See* Using Online Learning for At-Risk Students and Credit Recovery. (2008) Vienna, VA: North American Council for Online Learning. [http://www.inacol.org/wp-content/uploads/2012/09/NACOL\\_CreditRecovery\\_PromisingPractices.pdf](http://www.inacol.org/wp-content/uploads/2012/09/NACOL_CreditRecovery_PromisingPractices.pdf)

<sup>6</sup> Three states are making strides with credit advancement: Alabama, Alaska and New Mexico. In 2008, the Alabama State Board of Education passed a resolution allowing school systems to offer “Credit Recovery and/or Credit Advancement opportunities through which students may obtain course credit based on proficiency or mastery of content, rather than time spent in the classroom.” Nearly 50 percent of the districts took advantage of the enabling policy to provide credit recovery and/or credit advancement. Every high school in Alabama offers credit advancement, Advanced Placement courses, and credit recovery through the Alabama ACCESS program. In just three years, Alabama started to see dropout rates decrease and graduation rates increase. *See* ACCESS Distance Learning. <http://accessdl.state.al.us/Overview.html>. In Alaska, under the Education Opportunity Act passed in April 2014, a student may test out of courses they have mastered and earn credits to apply toward graduation. *See* [http://education.alaska.gov/news/releases/2014/sb\\_results\\_sept.pdf](http://education.alaska.gov/news/releases/2014/sb_results_sept.pdf). In New Mexico, a student can demonstrate competency in a subject area by meeting a certain score on one of the following: AP exam, ACT, SAT, PSAT, AccuPlacer or International Baccalaureate curriculum. *See* New Mexico’s Alternative Demonstration of Competency Manual <http://www.ped.state.nm.us/AssessmentAccountability/AssessmentEvaluation/2013/ADC%20Manual%202013-14%20VFinal.pdf>

<sup>7</sup> Studies have shown that competency based education models take time to develop and implement, and that benefits do not emerge immediately. However, many states have seen initial gains in student achievement. *See* Bill and Melinda Gates Foundation. (November 2014.) *Early Progress: Interim Research on Personalized Learning*. Seattle WA: Author. <http://collegeready.gatesfoundation.org/sites/default/files/Early%20Progress%20Interim%20Report%20on%20Personalized%20Learning%20-%20Full%20Report.pdf>

For instance, the School District of Philadelphia, which is a large, urban school district, implemented a competency based pilot for ninth graders. The initial review of the pilot showed a positive and significant outcome for attendance and promotion. *See* Steele, J., et. al. (2014). *Competency-Based Education in Three Pilot Programs, Examining Implementation and Outcomes*. [http://www.rand.org/pubs/research\\_reports/RR732.html](http://www.rand.org/pubs/research_reports/RR732.html). In Michigan, a study found that the seat time waiver positively impacted the probability of high school seniors graduating and further impacted the probability of at risk high school seniors graduating. Mounger, K. (2011). *The Michigan Seat Time Waiver: Its Impact on Students, At Risk and Non At Risk, and the Probability of Graduation*. <http://condor.cmich.edu/cdm/ref/collection/p1610-01coll1/id/3564>. In Chugach, Alaska, 90% of its students could not read at grade level and only one student in 26 years had graduated from college. After implementing a new performance-based vision for education, the school district saw dramatic gains. In just five years from implementation, average student achievement on the standardized test rose from the bottom quartile to the 72<sup>nd</sup> percentile, the percentage of students participating in college entrance exams rose from zero percent to 70 percent, and teacher turnover dropped to 2 percent. *See* Chugach, Alaska (2013). *CompetencyWorks*. <http://www.competencyworks.org/resources/how-alaskas-chugach-district-changed-education-through-performance-based-learning/>



**5) What benchmarks will OSSE use for judging whether these changes are advancing learning?**

OSSE will use short term and long term measures to assess success of the proposed changes. The benchmarks OSSE will use to evaluate success in the short term are:

- Test Scores on PARCC, Advanced Placement, SAT and ACT exams
- Course Performance
- Postsecondary aspirations
- Course-taking patterns
- High School attendance rates
- High school persistence rates
- Number of students passing and completing courses through Credit Advancement, Credit Recovery and CBL

The benchmarks OSSE will use to evaluate success in the long term are:

- High School Completion/Graduation Rates
- Post-Secondary Enrollment
- Industry certification
- Remediation
- Persistence Rates in postsecondary pathways
- College Graduation Rates
- Career readiness and outcomes
- Job placement in middle-skills or higher position with career trajectory

OSSE will convene a collaborative group of stakeholders to evaluate the competency based learning pilot. Additionally, OSSE will ask LEAs to report on implementation challenges and strengths, as well as provide information on credits awarded, standards and assessments used, and participating student cohorts. Overall, OSSE will evaluate the policies, practices, and structures to ensure the necessary conditions exist to support the implementation of course credit flexibility.

Once again, thank you for your continued support and engagement in our collective effort to provide quality education for the students of the District of Columbia. If you have any further inquiries, please do not hesitate to contact Christina Setlow, Director of Policy, Legislative and Intergovernmental Affairs at [christina.setlow@dc.gov](mailto:christina.setlow@dc.gov) or 202-724-1513.





## **Appendix A**

Throughout the process of developing the proposed Graduation Regulations, OSSE has engaged with LEAs and the SBOE. In addition, OSSE has conducted extensive research, including but not limited to the following:

Achieve. (2014). *Advancing Competency-Based Pathways to College and Career Readiness Series: The Imperative for State Leadership*. Mountain View, CA.  
<http://www.achieve.org/files/AchieveCBPTheImperativeforStateLeadership.pdf>

Achieve. (2013). *Advancing Competency-Based Pathways to College and Career Readiness Series: A state policy framework for graduation requirements, assessment and accountability*. Mountain View, CA. <http://www.achieve.org/publications/advancing-competency-based-pathways-college-and-career-readiness>

Adams County School District 50. *Competency Based System*, website.  
<http://www.adams50.org/site/default.aspx?PageID=1>

Alabama Select Commission on High School Graduation and Student Dropouts. (2009). *Every Child a Graduate*. Montgomery, AL.  
<http://media.al.com/bn/other/High%20School%20Dropout%20Commission%20Official%20Report.pdf>

Alliance for Excellence Education (2013). *Strengthening High School Teaching and Learning in New Hampshire's Competency-Based System*. <http://all4ed.org/wp-content/uploads/2013/06/StrengtheningHSTeachingLearningNH.pdf>

America's Promise. (2010). *How Alabama substantially cut its high school dropout rates: Case study from "Building a Grad Nation: Progress and Challenge in Ending the High School Dropout Epidemic."* Washington, DC.  
<http://www.americaspromise.org/News-and-Events/News-and-Features/APB-2010/Vol-44/Alabama-Case-Study.aspx>

American Youth Policy Forum. (2011). *Building Competency-Based Pathways: Successes and Challenges from Leaders in the Field*. Washington, DC.  
<http://www.aypf.org/resources/building-competency-based-pathways-successes-and-challenges-from-leaders-in-the-field/>

American Youth Policy Forum. (2013). *Moving to Mastery: A National Policy Forum on Competency-Based Education*. Washington, DC. <http://www.aypf.org/resources/moving-to-mastery-a-national-policy-forum-on-competency-based-education/>



Bill and Melinda Gates Foundation. (November 2014.) *Early Progress: Interim Research on Personalized Learning*. Seattle WA: Author.

<http://collegeready.gatesfoundation.org/sites/default/files/Early%20Progress%20Interim%20Report%20on%20Personalized%20Learning%20-%20Full%20Report.pdf>

Carnegie Foundation for the Advancement of Teaching. (2013). *50-state scan of course credit policies*. Menlo Park, CA: Carnegie Foundation for the Advancement of Teaching.

<http://www.carnegiefoundation.org/blog/giving-credit-where-credits-due-a-50-state-scan-of-course-credit-policies/>

Center for the Future of Arizona. (December 2011). *The Arizona Move On When Ready Initiative: Annual Report to Arizona State Board of Education*.

<http://www.arizonafuture.org/mowr/documents/SBEMOWR2011ReportWebFinal.pdf>

CompetencyWorks Wiki, website. (2014).

<http://competencyworks.pbworks.com/w/page/66734498/Welcome%20to%20the%20CompetencyWorks%20Wiki>

Grossman, T., & Shipton, S. (2012). *State Strategies for awarding credit to support student learning*. Washington, DC: National Governors Association.

<http://www.nga.org/cms/home/nga-center-for-best-practices/center-publications/page-edu-publications/col2-content/main-content-list/state-strategies-for-awarding-cr.html>

Iowa Department of Education. (2013). *Competency-Based Education Task Force: Final Report*. Des Moines, IA

<https://www.educateiowa.gov/sites/files/ed/documents/CompBasedTaskForceFinalReport.pdf>

Kentucky Department of Education. (2013) *Competency-Based Education: Helping All Kentucky Children Succeed*.

[http://education.ky.gov/school/innov/Documents/KY\\_CBE\\_Final\\_HR1-10-13.pdf](http://education.ky.gov/school/innov/Documents/KY_CBE_Final_HR1-10-13.pdf).

Le, C., Wolfe, R. & Steinberg, A. (2014). *The Past and the Promise: Today's Competency Based Education Movement*. Students at the Center: Competency Based Education Research Center. Boston, MA: Jobs for the Future.

<http://www.jff.org/sites/default/files/publications/materials/The-Past-The-Promise-091514.pdf>

Lewis, Matthew W., Rick Eden, Chandra Garber, Mollie Rudnick, Lucrecia Santibañez, & Tiffany Tsai. 2014. *Equity in Competency Education: Realizing the Potential, Overcoming the Obstacles*. Students at the Center: Competency Education Research





Series. Boston, MA: Jobs for the Future. <http://www.jff.org/publications/equity-competency-education-realizing-potential-overcoming-obstacles>

Maine Department of Education. *Center for Best Practices*, website. <http://maine.gov/doe/cbp/index.html>

Michigan Department of Education (2009). *Pupil Accounting Manual [Section 5-O-B Seat Time Waiver]*. Lansing, MI. [http://www.michigan.gov/documents/mde/5-O-B\\_SeatTimeWaivers\\_329678\\_7.pdf](http://www.michigan.gov/documents/mde/5-O-B_SeatTimeWaivers_329678_7.pdf)

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New Mexico Public Education Department. (2013-2014). *Alternative Demonstration of Competency Manual*. Santa Fe, NM. <http://www.ped.state.nm.us/AssessmentAccountability/AssessmentEvaluation/2013/ADC%20Manual%202013-14%20VFinal.pdf>

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Ohio Department of Education (2009). *SB 311: Selected research to inform Carnegie alternatives*. Columbus, OH. <http://www.education.ohio.gov/GD/DocumentManagement/DocumentDownload.aspx?DocumentID=61853>

Oregon Department of Education. March 2007. *Oregon Credit for Proficiency Pilot Project*. <http://www.ode.state.or.us/teachlearn/certificates/diploma/pilot-project-report-final.pdf>

Oregon Department of Education. 2011. *Proficiency-Based Teaching and Learning in Oregon: An Evolution from State Policy to Practice*. Salem, OR. <http://www.ode.state.or.us/teachlearn/standards/creditforproficiency/proficiency-based-tl-evolution.pdf>



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[http://competencyworks.pbworks.com/w/file/73363619/Awarding%20Credit%20to%20Support%20Student%20Learning%20-%20A%20Report%20to%20the%20Governor%20of%20Pennsylvania%20\(SecureVe.pdf](http://competencyworks.pbworks.com/w/file/73363619/Awarding%20Credit%20to%20Support%20Student%20Learning%20-%20A%20Report%20to%20the%20Governor%20of%20Pennsylvania%20(SecureVe.pdf)

Priest, N., Rudenstine, A., Weisstein, E., Gerwin C. (2012). *Making mastery work: A close-up view of competency education*. Quincy, MA: Nellie Mae Foundation.  
<http://www.competencyworks.org/wp-content/uploads/2012/11/Making-Mastery-Work-NMEF-2012-Inline.pdf>.

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[http://www.rand.org/content/dam/rand/pubs/research\\_reports/RR700/RR732/RAND\\_RR732.pdf](http://www.rand.org/content/dam/rand/pubs/research_reports/RR700/RR732/RAND_RR732.pdf)

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[http://www.competencyworks.org/wp-content/uploads/2013/02/inacol\\_cw\\_issuebrief\\_building\\_mastery\\_final.pdf](http://www.competencyworks.org/wp-content/uploads/2013/02/inacol_cw_issuebrief_building_mastery_final.pdf)

Sturgis, C. & Patrick, S. (2010). *When success is the only option: Designing competency-based pathways for next generation learning*. Vienna, VA : International Association for K-12 Online Learning (iNACOL). <http://net.educause.edu/ir/library/pdf/CSD6174.pdf>

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