



March 1, 2021

Peter Maier and Randy Spaulding
Washington State Board of Education
600 Washington Street SE
P.O. Box 47206
Olympia, WA 98504

Dear Chair Maier, Executive Director Spaulding, and Washington State Board of Education Members:

As representatives of 50 postsecondary colleges and universities and other stakeholders throughout Washington, we appreciate the opportunity to provide comments regarding the implementation of House Bill 1121. We are committed to ensuring that all students successfully complete high school. In this letter we aim to demonstrate our desire to:

- reasonably accommodate the challenges students face and encourage systems and processes that will help prepare students to complete college,
- ensure that students are appropriately prepared for college-level mathematics and writing and can be adequately supported within our campus capacities, and
- encourage that extensions to the bill beyond 2021 be further evaluated once we have emerged from the pandemic, when students and families have a better understanding of longer-term impacts.

In Washington and nationally, new jobs are overwhelmingly going to workers with a postsecondary credential – a degree, apprenticeship, or certificate. A postsecondary credential is necessary for Washingtonians who want a job that offers a good salary and advancement opportunities and the multitude of social, health and civic benefits it brings. This is true for all Washingtonians, regardless of race/ethnicity, gender identity, income, or geography.

The emergency waivers for certain graduation requirements established through the passage of House Bill 1121 provide an opportunity for students to earn a high school diploma and continue to advance towards their post-high school goals. It is crucial, however, that the emergency waivers for certain graduation requirements do not limit opportunities for students who want to pursue postsecondary credentials.

Accordingly, we have reviewed the key policy issues of the emergency waiver and offer the following recommendations:

We ask the State Board of Education to consider compelling districts to demonstrate a “good faith effort” to support students in meeting graduation requirements prior to considering an emergency waiver.

Prior to considering a waiver of courses or other programming, districts should provide additional academic supports to aid student completion and offer competency-based completion options with translation to courses, credits and grades on the high school transcript. This may be evidenced through a high school transcript, notes in a student file and/or a course catalog description.

To effectively demonstrate skills and knowledge that indicates preparation for postsecondary education, gainful employment and civic engagement, we ask the Board to require the high school transcript or equivalent as evidence of skills and knowledge through completion of high school core credits and grades earned.

For the purposes of a postsecondary credential, the courses and grades on a high school transcript are the primary representation of skills and knowledge. Beyond this, high school courses and grades determine college placement, completion of pre-requisites, apprenticeship readiness, and patterns of advancement through the four years of high school. In addition to high school transcripts, high schools may also determine postsecondary readiness through placement into college-level math and English courses at a college or university, completion of a dual-credit course during a student's junior or senior year, and/or completion of a summer bridge programs.

In prior discussions we explored the potential for other examples of evidence to demonstrate skills and knowledge, including completion of an admission application and FAFSA/WASFA. Those application processes are important to shaping student perceptions, confidence, and identity and are vehicles to showcase skills, knowledge, and need. However, they do not demonstrate the acquisition of skills or knowledge. For example, an admission application showcases a student's achievement, but it is the required high school transcript that institutions of higher education and other postsecondary paths use to determine academic preparation and, in many cases, eligibility for scholarships.

We ask the Board to limit additional waivers that go beyond the two-credit waiver for individual student circumstances to non-core credit courses for both the Class of 2021 and Class of 2022.

While we appreciate the parameters identified in HB 1121 that must be met to allow high school credits to be waived, we are concerned about the waiver of core credits. Core credits align with identified subjects critical to demonstrate skills and knowledge of academic preparation for a postsecondary credential. The waiver of core credits may result in students lacking academic preparation or facing potentially reduced post-high school options.

Mathematics and English, for example, are critical in the completion of a postsecondary credential. These courses are challenging and if students struggle at the postsecondary level because they are academically underprepared, they are likely to experience delays in their degree completion. We recognize that the policy would not allow for more than one credit in each subject area to be waived but are concerned students would still be allowed to waive critical core subjects.

If the Board determines core credit courses are waivable, we ask that waivers be limited in time (limited to the Class of 2021) and scope (no more than one core credit can be waived). We also ask that rules require guidance and information be provided to students and families regarding the potential impacts of the type and subject of the credits being waived as well as the recommendation that students contact institutions of higher education and apprenticeship providers regarding potential impacts.

We ask the Board to ensure that students are not allowed to waive both a course and a graduation pathway option in the same subject.

Core credits align with identified subjects that are critical in demonstrating skills and knowledge of academic preparation for a postsecondary credential. Waiving a graduation pathway and a course, particularly in a core credit area, increases the chances that students will not be prepared for successful postsecondary credential attainment.

We ask the Board to encourage language that bolsters collaboration between high school counselors and higher education institutions. Further, as appropriate, we urge documentation for the emergency waivers to include language that recommends students contact postsecondary institutions, or apprenticeship providers regarding impact of the emergency waiver as it pertains to admissions, apprenticeship completion and degree attainment.

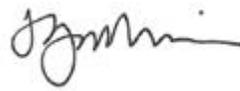
We recognize the pressures facing our high school counselors, both pre-pandemic and now. We believe high school counselors are critical to student advising, especially around the emergency waiver. We value the expertise of high school counselors and the complexity of high school advising. We do not believe it is appropriate for higher education to advise high school students on high school graduation requirements. However, we strongly support a collaboration between high school counselors, colleges and universities, and apprenticeship providers to ensure that students understand the potential consequences of waiving certain options.

Thank you for this opportunity to provide input. We appreciate your consideration and welcome further conversations around the implementation of this bill.

Sincerely,



Paul Francis, Executive Director
Council of Presidents



Jan Yoshiwara, Executive Director
State Board for Community and Technical Colleges



Terri Standish-Kuon, President and CEO
Independent Colleges of Washington



Steve Mullin, President
Washington Roundtable