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Utah State Board of Education
250 East 500 South
Salt Lake City, UT 84111

Re: R277-700 The Elementary and Secondary School General Core

Dear Board Chair Huntsman and Members of the Board:

On behalf of over 18,000 Utah educators, the Utah Education Association offers these comments on R277-700 and asks the Board to remove this rule from the consent calendar at the August 4 meeting to allow for further discussion of the concerns listed below.

In June, the Board awarded grants to several LEAs to develop competency-based learning pilot programs. Part of the stated purpose of the pilot program is to “develop a framework for competency-based education in Utah” before beginning implementation in the 2018-19 school year. Determining best practices and guidelines for successful implementation of competency-based learning is critical. Making substantive changes to the core requirements for middle school students by eliminating all references to credit units before establishing any guidelines to ensure successful implementation does not create the conditions for student success. Best practices around issues such as optimal school counselor-student ratios, effective ways to measure student mastery beyond simply more standardized testing, managing students who accelerate or require more time to demonstrate mastery, appropriate class size to maximize personalized learning, supporting the transition of students moving from a district with a competency-based program to a district with a traditional program, and maintaining appropriate staffing for an increased number of elective courses should be clearly identified as part of the framework developed through the pilot program before this change is made.

First, school counselors will play a critical role in guiding students and parents in the selection of coursework. An environment where a significant amount of coursework is entirely elective assumes students, parents and school counselors are able to work closely together to customize learning. However, the recommended school counselor-student ratio of 1:350 is currently not met in 15 LEAs and 75 individual schools, including two districts included in the competency-based learning pilot (Jan 2017 USBE Comprehensive Counseling and Guidance Program report). In addition, the current recommended ratio may not reflect the school counselor needs in a model that must work equally well for a student with involved parents to guide course selection toward a college/career-ready path and a student whose parents are not involved in customizing course selection. This creates concerns about equity and access issues for students, especially at a time when they need exposure to a breadth of learning to help develop their interests.

Second, the lack of a definition of “student mastery” creates concerns about increased testing. R277-700-5(6) states “an LEA Board is responsible for student mastery of the Core Standards.” However, the rule does not define “student mastery.” The lack of a definition raises concerns of mastery demonstrated simply by taking a test. This would increase the amount of student testing at a time when there is tremendous concern about over-testing. It also doesn’t identify any best practices about the elements of pacing, scope or sequence, and implies a student could demonstrate mastery on day one by “testing out.”

Third, the elimination of credit units does not address how each student’s learning needs will be met. The rule allows students to complete a course by demonstrating mastery with no relation to time, so some students will require less time to demonstrate mastery and other students will require more time. It is not clear what best practices should guide the management of students who accelerate and move to the next course within just a few weeks or months, those who require a significant amount of additional time and those who may never demonstrate “mastery.” In addition, all middle school students complete the SAGE English, math and science tests at a fixed time determined by the state, not when they have sufficiently demonstrated mastery. It is not clear how the elimination of seat time for English, math and science will be impacted by state-mandated accountability requirements.

Fourth, Utah’s largest class sizes will impact implementation of competency-based learning. Competency-based learning will be most successful in classrooms where there is adequate ability to differentiate and personalize learning for each student. However, this option is being extended to LEAs with no guidance on how class size may impact a competency-based learning model, recommendations for appropriate class size or best practices for mitigating the impact of class size in a competency-based model.

Fifth, students may not be sufficiently prepared to successfully move between a competency-based learning school and a traditional school. Because some LEAs may adopt this model while other LEAs keep a traditional model, it is not clear how students will be impacted if they move from one LEA to another. R277-700 requires all Utah students complete English language arts, math, science and history. Requirements for other “elective” courses are determined by the LEA and could vary widely across the state. How might this affect student success if an LEA has significantly different requirements, such as fewer required “elective” courses or the ability to “test out”, and the student moves to an LEA with more requirements? Similarly, how will students be prepared to transfer to a traditional high school program if they attend a competency-based middle school program?

Sixth, making a significant number of courses “elective” does not ensure that all students have access to a broad curriculum over time. R277-700-5(11) states “an LEA shall offer, by making the course available through the registration process...” various “elective” courses. How will an LEA ensure that every middle school student has sufficient access to a breadth of introductory courses in music, arts or world languages so they can access advanced courses once they reach high school? This is an issue of equity since some families would be able to supplement a lack of middle school art or music classes with private classes, but many families would not. It is also not clear how this may impact the ability of an LEA to anticipate and maintain adequate staffing for elective courses. And, if students complete a course at their own pace by demonstrating mastery, how might staffing be affected as students exit or enter a class part way through the school year?

Finally, and perhaps most importantly, no clearly stated purpose or goals for making this change have been identified. Is the goal to improve student performance on statewide, standardized tests? Improve student attendance rates? Improve promotion rates from eighth grade to high school? Increase student engagement and satisfaction in learning? Whatever the goals may be, how will the Board demonstrate that positive outcomes were achieved by this change to competency-based learning? And, equally important, how will the Board ensure equitable opportunities for each student?

The proposed changes in R277-700 are a concern because the Board has not established any support, guidance or technical assistance necessary for successful implementation across the state. We should first identify best practices through the competency-based learning pilot and create a coherent framework to guide LEA implementation to ensure student success and equity. This is the model the Board followed in creating the Digital Teaching and Learning program. The Board designed a very deliberate process to carefully identify essential elements and best practices of digital teaching and learning and then created a framework for consistent implementation in LEAs. These best practices were incorporated by reference in to Board rule R277-922 before implementation.

We believe passing the proposed changes in R277-700 before the Board has received any recommendations from the competency-based learning pilot is premature. We ask the Board to not move R277-700 forward and recommend the Board work to align the goal of greater flexibility for students and LEAs with clear data and evidence provided by the current competency-based pilot.

Sincerely,



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