



The current regulations were adopted by the Board of Education on May 24, 2006, and became effective on September 7, 2006.

The proposed regulations address three major areas. They would:

- Incorporate the graduation and completion rate for schools into Virginia's accountability system,
- Prescribe the requirements for the Standard Technical Diploma and the Advanced Technical Diploma, and
- Require all students, beginning in middle school, to have an Academic and Career Plan.

In July 2006, the President of the Board, Dr. Mark Emblidge, formed a special committee of the Board of Education to research and recommend policies to reduce the number of students who drop out of high school and to improve graduation rates, especially among minority students. The proposed graduation and completion index is an outgrowth of the work both of that committee and of the Board's adoption of a graduation rate formula in November 2006.

The 2007 General Assembly passed legislation that requires the Board of Education to establish the requirements for the Standard Technical Diploma and the Advanced Technical Diploma (HB 2039 and SB 1147). The legislation, as amended by HB 97 in the 2008 session, amends § 22.1-253.13:4 of the *Code of Virginia* to require the Board to:

D. 3. Establish the requirements for a technical diploma. This diploma shall meet or exceed the requirements of a standard diploma and will include a concentration in career and technical education, as established in Board regulations. A student who meets the requirement for the advanced studies diploma who also fulfills a concentration in career and technical education shall receive an advanced technical diploma, or if he chooses, he shall receive an advanced studies diploma. The Board may develop or designate assessments in career and technical education for the purposes of awarding verified credit pursuant to subdivision 6; ...

Finally, in a letter to the Board President dated December 20, 2007, Governor Kaine requested that the Board consider including the requirement for an academic and career plan for all students, beginning in the middle school years.

During the public comment period, September 1 through November 5, 2008, the Board received 475 comments. Most of the comments addressed either economics and financial literacy or graduation and dropout prevention, including the Graduation and Completion Index. Following the public comment period, the Board received several requests to delay implementation of any additional requirements in the proposed regulations because of the budget situation. A summary of the public comments is attached.

Finally, there are three bills before the 2009 General Assembly that relate to these regulations:

- HB 2166 (Lohr) would delay until July 1, 2010, any additional requirements related to school accreditation and graduation requirements.
- HB 2619 (Barlow) addresses transfer provisions for course credits earned for the Department of Education's online program, Virtual Virginia.
- HB 2552 (Crockett-Stark) would add to the requirements for earning a diploma a standard credit in economics and personal finance, beginning with the first-time ninth-grade class of 2010-

2011. Although Delegate Crockett-Stark strongly supports requiring a standard credit in economics and personal finance, in deference to the Board and recognizing that this issue would come before the Board this month, she asked that the bill be passed by with a letter to the Board of Education requesting that the Board consider establishing such a requirement.

**Summary of Major Elements:** The following substantive changes are proposed:

8 VAC 20-131-50. Requirements for Graduation:

- One credit in economics and personal finance would be required for the Standard, Standard Technical, Advanced Studies, and Advanced Technical Diplomas.
- Additional graduation requirements would become effective with the ninth-grade class of 2010-2011.

8 VAC 20-131-60. Transfer Students:

- Credits earned through Virtual Virginia, the online program, would be accepted in Virginia public schools.

8 VAC 20-131-140. College preparation programs and opportunities for postsecondary credit:

- The Academic Career Plan would become effective with seventh graders in 2010-2011.
- The development timeline is extended throughout the student's seventh-grade year with completion required by the fall of the eighth-grade year.
- The Board of Education will establish guidelines for development of the Plan.
- Any personal academic and career plans prescribed by local school boards for students in grades 7-12 that are currently in effect would be approved to continue without further action by the Board.

8 VAC 20-131-280. Expectations for school accountability and 8 VAC 20-131-300. Application of the standards:

- The Graduation and Completion Index points required for full accreditation would be increased from 80 to 85 percentage points.
- The points assigned for the certificate of completion is reduced from 60 to 25 points.
- Use of the Graduation and Completion Index for high school accreditation purposes would be delayed by one year with a five-year phase-in as originally proposed. The first year a school could be Provisionally Accredited or Accredited with Warning due solely to the graduation and completion index is the 2010-2011 academic year (2011-2012 accreditation year).
- The accreditation pass rates in effect for the 2008-2009 academic year will remain in effect through the 2009-2010 academic year.

**Superintendent's Recommendation:** The Superintendent of Public Instruction recommends that the Board of Education approve the proposed regulations as amended and authorize staff of the Department of Education to proceed with the remaining steps required by the Administrative Process Act.

**Impact on Resources:** The impact on resources for these regulations is not expected to be significant.

**Timetable for Further Review/Action:** The Department of Education will notify local school divisions of the changes in the regulations when the regulations become final, pursuant to the requirements of the Administrative Process Act.

**Regulations Establishing Standards for Accrediting  
Public Schools in Virginia (SOA)  
8 VAC 20-131  
Summary of Public Comments**

The public comment period required pursuant to § 2.2- 4000 et seq., of the *Code of Virginia* commenced September 1, 2008, and ended November 5, 2008. During the comment period the Virginia Board of Education received comments from 475 individuals or groups regarding the proposed revisions to the SOA. The following document provides a summary of each comment submitted. This document is intended for summary purposes only. All comments received are available in full to each member of the Board of Education. The 475 commenters provided comments in the following areas:

- Diploma Requirements (including Technical Diplomas) – 25 individuals or groups commented on the diploma requirements.
- Graduation Rates and Dropout Prevention (including the Graduation and Completion Index) – 117 individuals or groups made comments in the area of graduation rates and dropout prevention. One group’s comment included a petition with 209 signatures supporting the comment.
- Academic and Career Plan – 12 individuals or groups commented on the proposed academic and career plan.
- Economics and Financial Literacy – 329 comments were made on the subject of economics and financial literacy.
- Funding – Eight comments addressed the issue of funding the proposed amendments.
- Double Testing of Students – Four commenters addressed the issue of eliminating double testing of students.
- Removal of Students – Four commenters addressed the issue of providing notice to parents when students are removed from classes.
- Other – Eight comments were in categories either not addressed by these regulations or not in the major categories where amendments are proposed.

Subsequent to the closing of the official public comment period growing concern from school divisions regarding the revenue forecasts resulted in many divisions writing to the Board. The divisions expressed concern regarding the current economic situation and the inevitable K-12 budget cuts that will result. Due to the reduction in state funding for public education in conjunction with new regulatory requirements proposed in the revisions school divisions have requested that the Board of Education postpone “implementation of any unfunded mandates until the General Assembly provides sufficient funding that will enable local school districts to meet increased accountability standards in a fiscally responsible manner.” A summary of these letters

is also included at the end of the comments.

	<b>Commenter</b>	<b>Comment</b>
1.	Robert Leber , Director, Education and Workforce Development Northrop Grumman Shipbuilding	<p>Commenter has two areas of concern for the proposed regulations:</p> <ul style="list-style-type: none"> <li>• Only one credit hour of "Fine Arts, Foreign Language, <u>Economics or Personal Finance</u>" is required for the Technical Diploma.</li> <li>• The requirement for 3 credits of a foreign language for the Advanced Technical Diploma seems excessive, while it requires only one credit hour of "Fine Arts or <u>Economics</u>."</li> </ul> <p>Economics and finance are important educational components and unfortunately these subjects do not always get the attention they need. The proposed credit requirements do not promote the level of economic and financial literacy Virginia's students will need to thrive in our changing economy, particularly in technical careers. Students must be provided with an understanding of the basic economic principles they will need to be successful in their adult life, particularly considering that they are now in charge of their own retirement plans via 401k programs vs. the defined benefits programs of past.</p>
2.	Beth and Daniel Dorman	<p>The current Virginia Standards of Learning require that students learn how to form the cursive letters in the third grade. However, the Standards of Learning do not require students to achieve mastery of cursive. Virginia students are unable to read cursive script and unable to provide cursive signatures. There is no longer a place on the report card to record a student's level of achievement of this important skill. The record needs to be restored to the report card and students need to master cursive writing.</p>
3.	Helen Rickard	<p>A substitute teacher for the Prince William County schools and for Manassas City schools has been searching and applying for teacher assistant jobs for the past year with no luck. The individual was told by other staff that it is very hard to get a full-time job in the school system and it's all who you know when it comes to getting a full-time position. She finds this very unfair and is upset that she cannot be a teacher assistant in either school division.</p>
4.	Cheryl A. Poe Advocating 4 Kids	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p>

		<p>Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p>
5.	D. Desai	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p> <p>Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p>
6.	Debra A. Grant	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p> <p>Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p>

7.	John A. Caggiano, Ed.D. Westside Elementary School Principal	An elementary principal (grades 4-6) in Isle of Wight County is concerned about the proposal to no longer allow students to double test in math. Many schools, in an effort to increase rigor, are pushing students to excel in mathematics. One such strategy is taking Grade 6 students with a strong foundation in basic mathematical concepts and scheduling them to take Pre-Algebra in Grade 6. While not all of these students will take Algebra in Grade 7, many of them will. If double testing is eliminated schools will be penalized for adding rigor. The principal would hate to see double testing done away with simply for financial reasons. And that unintended consequences are considered.
8.	Cary Epes	Commenter strongly supports requiring that all students receive economic education to improve their personal financial management.
9.	Catherine J. Rotolo	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials. Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.
10.	Judy Mejia	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials. Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special

		Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.
11.	Dee Jacobson	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p> <p>Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p>
12.	Dylan Rosenthal	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p> <p>Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p>
13.	Melinda Whitehurst	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p> <p>Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to</p>

		students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.
14.	Barbara Foster	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p> <p>Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p>
15.	Parent Greenbrier Schools	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p> <p>Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p>
16.	Judy Lucenta	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and

		<p>Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p> <p>Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p> <p>In addition commenter requests the SOA provide a scientific research-based reading program that utilizes a multisensory phonetic awareness approach to all children. Commenter states that not all children are given proper training to learn how to read, and teaching reading to all students will improve the graduation rate and decrease the drug abuse and crowdedness of our jails.</p>
17.	Theresa Speight	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p> <p>Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p>
18.	Trenace B. Lewis The Sound of Judah	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p> <p>Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to</p>

		students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.
19.	Mary S. Howard	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p> <p>Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p>
20.	Regina Craig- Parent and Daughter	<p>Commenter states that only the Standard and Advanced Diplomas should get full credit; other options such as GEDs should be weighted according to their value to the student after high school; graduation rates must be increased for all of Virginia's most vulnerable students, including economically disadvantaged students, students with disabilities or who have limited English proficiency, and minority students.; increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p>
21.	Mieko Manuel Timmons	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p> <p>Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to</p>

		<p>students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p> <p>Commenter supports effective and sustainable initiatives to prevent and decrease the drop out rate for school-aged children.</p>
22.	Daniel" Seok H. Choi	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p> <p>Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p>
23.	Amy Estes, Vice President Counseling Delivery ClearPoint Financial Solutions	<p>Commenter requests the final regulations include requiring all students to complete an Economics/Personal Finance Course prior to graduation. Commenter states that high school graduates have not been taught the importance of the wise use of credit, how to manage their budgets within their means, and more often than not, these citizens end up in financial crisis. This financial crisis not only impacts their ability to meet their financial obligations, but impacts their ability to find good paying jobs as well as retain jobs without implications that are caused by garnishments or judgments. Additionally, they pay higher interest for loans, are often victims of payday lending, and pay higher premiums for insurance as they are identified as "credit risks" on their credit reports. It often bleeds over into marital issues, innocent children suffering due to foreclosures and lack of sufficient funds to meet their daily needs, and also leads to health implications due to stress and</p>

		the lack of ability to provide preventative care.
24.	Kim Wilkerson, Vice President, Virginia Community Credit Union	Commenter requests the final regulations include requiring all high school students complete a financial literacy course. Commenter states that students today graduate with calculus but cannot balance a checkbook. They have no understanding of the basics of personal finance therefore explaining low credit scores and the inability to correct credit problems.
25.	Cheryl Ayers, Director Center for Economic Education Lynchburg College	Commenter supports a required economics/personal finance course for every high school graduate (not just those earning an advanced diploma).
26.	Melanie Marks	Commenter supports a stand-alone economics & financial literacy course for all high school students. Commenter states that financial literacy incorporates an understanding of economics, personal finance and investing, smart saving, wise use of credit, and understanding of taxes, insurance, etc.
27.	Emily Willis, Librarian, Culpeper Middle School	Commenter believes it does not make sense to add an economics/personal finance requirement only for students pursuing an advanced studies diploma. Commenter states that all students would benefit from this type of instruction and that adding an elective requirement is not a good idea. Commenter states that students pursuing advanced studies diplomas are usually overbooked with activities and classes.
28.	Mary Ellen Hutchind, Culpeper Middle School	<p>Commenter states that language in 8VAC20-131-30. Student achievement expectations should read:</p> <p>“...students who are accelerated shall take the test of the grade level enrolled or the tests for the grade level of the content received in instruction. No student shall take more than one test in any single content area in any tested grade.”</p> <p>Commenter removed the words "be required to":  Commenter opposes double testing and requests that students stop being double tested because it only makes some schools look better than they really are and others look worse than they really are. Commenter believes ending double testing will show how/what students are really learning across the state.</p>
29.	Carolyn Inskeep Culpeper Middle School	<p>Commenter opposes double testing and does not feel the changes in 8 VAC 20-131-30 are strong enough.  Commenter suggests that the language should state "NO STUDENT SHOULD BE ALLOWED to take more than one test in any single content area in any tested grade."</p>

30.	Bruce T. Whitehurst, President and CEO, Virginia Bankers Association	Commenter believes it is time to require all students to take a course in economics and personal finance. Commenter urges the Board to find a way to include such a course in all diploma tracks. Commenter states that there is a need to educate our youth on basic financial literacy.
31.	Jenifer Choi-White Secondary Alternative Education Teacher Waynesboro High School	Commenter opposes creating a "Graduation and Completion Index" which would be used for accreditation purposes. Commenter believes schools should not be put at risk of not receiving accreditation because students with extenuating circumstances do not graduate on time.
32.	Vicki L. King, Librarian Beverly Manor Middle School	Commenter states in reference to 8 VAC 20-131-140 Academic and Career Plans that "this one of those well-intentioned plans created by someone far removed from the classroom. This plan does nothing more than add yet another piece of paper to be completed and filed just so the school can say it is compliant. No one in any K-12 public school has time to do what is proposed. A piece of paper does not improve a child's education: only a well-planned teacher can do that. The state continually adds things to the teacher's plate without every taking anything away. Our guidance counselors are well-equipped to guide students down the correct educational path through conferences and scheduling. No further documentation is needed."
33.	Stacy K Puckett, Controller Virginia Bankers Association	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
34.	John R. Milleson, President and CEO Bank of Clarke County	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
35.	Kellee Edelin Assistant/Project Manager Virginia Bankers Association	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
36.	Gail N. Askew Manager, Health & Welfare VBA Benefits Corporation	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
37.	N Byrd Newton, President Northern Neck State Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.

38.	Amy P. Binns Training Events Manager Virginia Bankers Association	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
39.	Bobby Fothergill Vice President / Agency Manager Virginia Title Center, LLC	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
40.	E.J. Fogarty	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
41.	Suzanne Jenkins Senior Accountant Virginia Bankers Association	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
42.	Matthew J. East Collections Representative Bank of Botetourt	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
43.	Francine A. Bramble Administrative Assistant VBA Benefits Corporation	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
44.	Mrs. Nancy M. Moga, Principal Callaghan Elementary School	Concerning the proposed change in 8VAC20-131-210. Role of the principal: <u>“Notify the parents of students removed from class for disciplinary reasons for two or more consecutive days in whole or in part.”</u> Commenter states that this is the practice in most schools. Commenter suggests changing parents to parent or guardian. Commenter states that principals rarely have enough time to contact one parent let alone both.
45.	Jeanette Burrows-Holt Credit Administration Assistant Bank of Botetourt	Commenter endorses the requirement of a class in economics and personal finance for all high school students.
46.	Scott Horchler SunTrust	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
47.	Robert N. Fothergill	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
48.	Rita Cook-Raynor Banking Officer American National Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.

	and Trust Company	
49.	Rex A. Hockemeyer Executive Vice President Union Bankshares Corporation	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
50.	Trudy C. Epps American National Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
51.	Robin Brown American National Bank and Trust Company	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
52.	Beverly Terry	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
53.	Helm Dobbins Executive Vice President American National Bank and Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
54.	Charles H. Majors President & Chief Executive Officer American National Bank & Trust Company	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
55.	Lisa Johnston, MBA Accounting Operations Supervisor American National Bank & Trust Company	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
56.	Sandra P. Buchanan Credit Clerk American National Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
57.	Meredith T. Moore	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
58.	Carol M. Barnett Executive Assistant to Jeffrey V. Haley American National Bank and Trust Company	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
59.	Kim Richardson Principal-Forrest Elementary	Concerning the proposed change in 8VAC20-131-210. Role of the principal: <u>“Notify the parents of students removed from class for disciplinary reasons for two or more consecutive days in whole or in part.”</u> Commenter states that this is the practice in most schools. Commenter suggests changing parents to parent or guardian. Commenter states

		that principals rarely have enough time to contact one parent let alone both.
60.	Allison Mease StellarOne	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
61.	Stuart Evans American National Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
62.	Maxine Nester	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
63.	Bobbi Weimer Virginia Bankers Association	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
64.	Susan Mason Virginia Bankers Association	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
65.	Richard G. Frank, Executive Vice President StellarOne Bank	Commenter applauds the Board's effort to institute personal financial literacy courses in the curriculum of Virginia schools, and urges the Board to expedite the requirement.
66.	Anne and Raymond Worley	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
67.	Neal Petrovich Executive Vice President and Chief Financial Officer American National Bank and Trust Company	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
68.	Michelle A. Alexander Senior Vice President & CFO Bank of Botetourt	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
69.	Brenda B Reagan American National Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
70.	Tara Y. Harrison, CPA, Director of Internal Audit Stellar One Corporation	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
71.	Leta Beecher	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
72.	Michael A. Estes VP-Area Exec. Pendleton Comm Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.

73.	Donna Hankins, Director of Human Resources American National Bank and Trust Company	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
74.	Joseph A. Hoge Director of Corporate Loan Review StellarOne Corporation	Commenter advocates for an economics and personal finance course.
75.	Maggie Elbourn	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
76.	Stephanie A. Hottle Customer Service Representative Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
77.	Michele Haynie Executive Assistant Shore Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
78.	Gary R. Shook President Middleburg Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
79.	Pat Henderson Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
80.	Tasha W. Parrish Processor / Cash Flow program Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
81.	Joseph Boling, Chairman and Anna L. Campbell Middleburg Financial Corporation (SOA Box)	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
82.	G. Leonard Pittman, Jr. Corporate Banking Market Manager StellarOne	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
83.	Thomas H. Richardson Vice President Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
84.	Jeffrey W. Farrar, CPA Executive Vice President and Chief Financial Officer StellarOne Corporation	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.

85.	Patricia R. Lewis VP & Director of Human Resources Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
86.	George M. Longest, Jr. Bank of Essex	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
87.	Jason R. Brady Vice President & Lending Officer Rappahannock National Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
88.	Teresa Rowe Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
89.	Patricia L. Clark, Residential Loan Officer Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
90.	Garland L. Humphries Vice President - Credit Administration Bank of Botetourt	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
91.	Kasey Milby Administrative Assistant Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
92.	Andrew T Shotwell Senior Vice President - Operations Bank of Botetourt	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
93.	Melissa Norris Teller Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
94.	Becky Foster Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
95.	Nancy Bowley Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
96.	Sheri H. George Loan Processing Center Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
97.	Cathy Mise AVP & Loan Officer Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
98.	Mary D. Tabor StellarOne	Commenter urges the Board to require all students to take a high school economics and personal finance course and

	Senior Vice President	include such a course in all diploma tracks.
99.	Penny Gilbert Branch Manager Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
100.	G. Lyn Hayth, III. President, Bank of Botetourt	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
101.	Lisa H. Cannell Director of Human Resources StellarOne Corporation	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
102.	Ed Gumphrey Virginia Beach	Commenter endorses adding basic economics training to the high school curricula, for all students, not just those earning an advanced studies diploma.
103.	Teresa W. Stewart, AVP Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
104.	Dianne Hall VP/Chief Operations Officer Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
105.	Jack Geier   AVP/I.T. Manager Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
106.	William P. Heath, Chairman of StellarOne Corporation	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
107.	Randy K. Ferrell, President and CEO Fauquier Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
108.	Susan L. Dameron Executive Assistant Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
109.	Lee M. Kerns StellarOne Corporation	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
110.	Michael R. Kane, Sr. Senior Vice President StellarOne Corporation	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
111.	Jessica Sandlin	Commenter believes the current K-12 curriculum is not enough. Commenter believes economics should also be a requirement in high school.
112.	Theresa L Singer	Commenter requests that the Board consider making it mandatory for all high school students to take a one year course on economics and personal finance. Commenter believes one semester should be devoted to each of those

		topics, and that it should not be an either/or choice.
113.	Cathy Jackson Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
114.	Phyllis E. Hyde LPC Chesapeake Bank Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
115.	Sheila Church Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
116.	G. William Beale President & CEO Union Bankshares Corporation	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
117.	Howie Soucek HR Director Manry Rawls	Commenter suggests that the Board include a requirement that each student must successfully complete a course in public speaking and a course in economics and personal finance to graduate.
118.	Marlene Caldwell Accountant Bankers Insurance, LLC	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
119.	John & Allison Wilson	Commenter does not support wasting discussion time and money on additional diploma types. Commenter believes the process should be simplified in the school system to support efficient operations.
120.	Robert H. Williams Senior Vice President First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
121.	Julia N. Bell Senior Vice President First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
122.	John W. Rock Senior Vice President First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
123.	James W. "Jim" McAlister Senior Vice President First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
124.	John D. Meade, III Senior Vice President First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
125.	W. Mark Nelson Chief Financial Officer First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
126.	William H. Hayter President & CEO First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.

127.	Leton L. Harding, Jr. Executive Vice President First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
128.	Roberta A. Looney Senior Vice President First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
129.	Robert “Chip” Glover Senior Vice President First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
130.	John P. Bowers Senior Vice President First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
131.	Carl H. Craig, Jr. Senior Vice President First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
132.	James C. Hyson Senior Vice President First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
133.	Laurie L. Landes Senior Vice President First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
134.	Melissa Loudermilk Branch Manager Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
135.	Johanna M. Northstein, Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
136.	Shelton Land, Land Mindz, Inc Angela Alston	<p>Commenter believes if parents know the importance and difference between diploma types then many parents in the low income community would push their children toward the highest attainable diploma.</p> <p>Commenter requests that the Board (1) increase the target to 90 points or more to promote diploma graduates and eliminate graduation gaps among student subgroups; (2) provide a small “extra credit” value to Advanced and Standard diploma-earners; (3) weight Special and Modified diplomas below the Advanced and Standard diplomas; and (4) lower the value of all non- diploma options such as GEDs and Certificates of Completion to reflect the diminished opportunities that they offer to students.</p>
137.	Donna Crane IB Coordinator Midlothian High School	Commenter is concerned that the Board proposes requiring two additional standard credits in order to earn an Advanced Studies Diploma – one in economics or personal finance, and one in an elective, thus requiring a total of 26 standard credits for the advanced diploma. Commenter is concerned

		for International Baccalaureate diploma candidates; they are required to take IB courses in six areas as well as an additional course, Theory of Knowledge. Commenter believes that if added to the state mandates for an Advanced Studies diploma, these requirements make it extremely difficult, if not impossible, for any curricular choices for these students. Commenter inquires whether a state waiver for either of these classes is a possibility.
138.	Jackie L. Cooper Staff Auditor Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
139.	Paula Owens Mortgage Lending Specialist Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
140.	Tammy Krejcarek	Commenter relayed concerns on behalf of some teachers regarding the third grade SOL revisions.
141.	Cheryl Tilley Accounts Payable/Cash Application Specialist Virginia Bankers Association	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
142.	Megan Emanuel Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
143.	Ginger Smith	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
144.	Judi DeDonato	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
145.	Sharon Waters, Parent	Commenter believes guidance counselors and special education teachers need to receive better professional development for addressing the different needs of autistic children.
146.	Beth Perry	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
147.	Lisa M. Roberts	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion

		index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials. Schools need teachers and staff who know how to help special needs students graduate with regular diplomas.
148.	Michele Hymer Blitz	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
149.	G. Lynn Wingard	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
150.	Sheila Kuders	Commenter believes inadequate and under funded services to support students with special needs after graduation are the more critical issues rather than the type of diploma a special needs student receives.
151.	VA Public Schools Graduate	Commenter urges the Board to not base school accreditation only on test scores. Commenter encourages the Board to provide a strong reward system for schools that find ways to keep students engaged in and attending school; to provide incentives to increase graduation rates for Latino/Hispanic students, especially targeting those that are limited English proficient; and to provide incentives to increase graduation rates for pregnant teenagers.
152.	Barbara Keefe Parent	Commenter supports Standards of Learning and educational support for students with special needs to ensure they graduate with a regular diploma.
153.	Carrie Shuler	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
154.	D. DiCola Commenter	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
155.	Ms. Vasantha K. Rayman	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
156.	Deanne McNulty	Commenter requests that the Board increase the target to at

		least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
157.	Keith S. Farrell	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
158.	Nancy F. Maloy	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
159.	Corrine Louden	Commenter advocates for requiring a course in economics and personal finance to graduate.
160.	James T Campbell, CPA VSCPA	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ol style="list-style-type: none"> <li>1. Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>2. Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.”</li> </ol>
161.	Kelly Stefanko, CPA	Commenter advocates for requiring a course in economics and especially personal finance to graduate.
162.	Tracey D. Coats, CPA Chief Financial Officer CWD Kids	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma</li> </ul>

		<p>requirements.</p> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or <i>Economics and Personal Finance.</i>”</li> </ul>
163.	E. Neal Post	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.</p>
164.	Sammy Cohen, MPA,CPA Director of Business Services Virginia Beach City Public Schools	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or <i>Economics and Personal Finance.</i>”</li> </ul>
165.	Tracy Schneider VP - Marketing and Operations CWD Kids	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul>

		<p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.”</li> </ul>
166.	Bradford R. Jones, CPA CMA CVA Partner, Family Business Group	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.”</li> </ul>
167.	Stephen Y. Dickinson, Controller & CAO Media General, Inc.	<p>Commenter requests that personal finance be included in graduation requirements.</p>
168.	Jesse S. Novak Senior, Roanoke College	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and</p>

		<p>personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.”</li> </ul>
169.	Kara A. Whiteley Marketing Manager CWD Kids	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.</p>
170.	George E. Nichols Vice President-Finance VTLS Inc.	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.”</li> </ul>
171.	Jeffrey W. Foutz, CPA University Housing Group, Inc. and Affiliates	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following</p>

		<p>changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
172.	<p>Douglas W. Adams CPA, CFP® Tax Manager B. J. Kane &amp; Company, P.C.</p>	<p>Commenter believes that most personal finance courses have a project on picking and tracking stocks out of the financial pages. Commenter requests that these projects be avoided because they do little to teach and they are counter to the concepts of asset allocation portfolio theory that most successful financial planners and investors are using. Commenter believes personal finance courses should be as practical as possible. Commenter considers the exposure to personal finance far more important than the academic teaching of economics which, the teachers will more than likely focus on.</p>
173.	<p>David S. Timms CPA/ABV, CVA VALUATION ONE OF VIRGINIA BEACH</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
174.	<p>James Branham Cost Settlement &amp; Audit Manager</p>	<p>Commenter supports the position of the Virginia Society of CPAs, and advocates for requiring all students to take a high school economics and personal finance course and include</p>

	Department of Medical Assistance Services	such a course in all diploma tracks.
175.	Gregory M. Lawson, CPA/ABV Stephanie R. Peters, CAE Virginia Society of Certified Public Accountants (VSCPA) Chair of the Board of Directors VSCPA President & CEO	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.”</li> </ul>
176.	Rachel Puckett, CPA Sr. Tax Manager Talecris Biotherapeutics, Inc.	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.”</li> </ul>
177.	Lewis J. Jones, CPA	Commenter urges the Board to require all students to take a

		high school economics and personal finance course and include such a course in all diploma tracks.
178.	Brenda Springer, CPA	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
179.	Gordon A. Adler CPA	<p>Commenter supports the Virginia Society of CPA's position to include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students</p>
180.	Lara B. Casteel, CPA/Legal Assistant Morin & Barkley LLP	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the</li> </ul>

		advanced studies technical diploma to read “Fine Arts or Economics and Personal Finance.”
181.	Mary Jo Fields, Virginia Municipal League (VML)	VML’s position is that local governments cannot continue to be the senior partner in funding education. VML requests that any revisions to standards that increase costs need to have funding attached to them, and that the Board not impose new funding and administrative requirements. VML further requests that the Board review standards to determine if there are any that can be deferred or delayed. If the state cannot fund the mandates and requirements under the standards of accreditation and the standards of learning, then those standards should be revised to reflect what can be funded.
182.	Dr. Randy D. Barrack Executive Director/CEO Virginia Association of Secondary School Principals, Inc. President Virginia Foundation for Educational Leadership, Inc.	Virginia Association of Secondary School Principals (VASSP) has two distinct concerns regarding the proposal to require Academic and Career Plans for all 7th and 8th graders. First, VASSP believes that middle school students are not of a maturity level to make firm decisions about career paths. Currently educators promote career exploration during the middle school years through elective courses and via large group approaches (i.e., Career Days) in order to expose students to a range of career paths. Educators believe this methodology of early exposure to the career discussion is the best and most age appropriate way to introduce students to the widest variety of fields. Second, regulations that address academic and career guidance already exist in the Virginia Administrative Code Chapter 620 8VAC20-620-10 requiring each school to make “reasonably available with available resources” academic and career guidance to all students. Within these parameters, each school division must assess its capabilities and priorities based on available funding and local objectives. The VASSP recommends that the Academic and Career Plan initiative might be more effectively accomplished through means of a statewide survey to ascertain how each school division currently approaches academic planning as well as the different ways schools provide career information. Results of the survey could then be used to create a “best practices” inventory as well as an assessment tool, which could be utilized as an accountability measure for future reporting purposes.
183.	Digby A. Solomon President & Publisher Daily Press	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
184.	Dr. Kitty J. Boitnott,	VEA comments address the following sections of the

	<p>President, Virginia Education Association (VEA)</p>	<p>regulations:</p> <ul style="list-style-type: none"> <li>• 8 VAC 20-131-30- VEA supports the proposed revision clarifying that no student can be required to take separate tests for both their enrolled grade level and for the advanced grade level of the content received in instruction.</li> <li>• 8 VAC 20-131-50- VEA supports efforts to elevate public perception of career and technical education. VEA believes not only should new diplomas be created but a more comprehensive system with a broad spectrum of assessments that prepare students for the workforce should be created.</li> <li>• 8 VAC 20-131-50- VEA does not believe that altering diploma requirements or changing course sequences will work without additional state funding for overburdened localities.</li> <li>• 8 VAC 20-131-140- VEA opposes the academic and career plan proposal by the Governor. VEA believes the plans create extra paperwork that will fall on school staff taking time away from instruction. Also this proposal will require in-service training; the development of software; and additional personnel. VEA believes assessment of the fiscal impact is needed.</li> <li>• 8 VAC 20-131-210- VEA supports the revisions to this section.</li> <li>• 8 VAC 20-131-280 – VEA has concerns regarding unintended consequences of the graduation and completion index and the possibility it will result in channeling students into GED programs. VEA would like to work with the Board to develop a system that encourages schools to work towards higher graduation rates, including rewarding schools for keeping students engaged; awarding points for diplomas according to their value to students after high school, and disaggregating graduation data to ensure vulnerable students are not left behind.</li> </ul>
185.	<p>Pamela H.Orsini, CPA Golden Living</p>	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.</p>
186.	<p>Ken Yasnowsky</p>	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p>
187.	<p>Kathleen E. Valentine</p>	<p>Commenter requests that the Board increase the target to at</p>

		least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
188.	Kevin Simowitz Virginia Organizing Project	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
189.	Angela Ciolfi Just Children	<p>Just Children supports:</p> <ul style="list-style-type: none"> <li>• The use of a graduation and completion index for high school accreditation;</li> <li>• Giving schools credit equal to the values of the credential for students who receive a diploma or GED or who remain in school working to achieve a diploma or GED;</li> <li>• Giving schools credit for keeping students in school no matter the amount of time it takes to earn a diploma or GED.</li> </ul> <p>Just Children opposes:</p> <ul style="list-style-type: none"> <li>• Awarding points for certificates of completion;</li> <li>• Setting the target closer to the value of a GED than to a diploma;</li> <li>• Treating all diplomas equally when they are not equal in value to students;</li> <li>• The absence of any accountability for narrowing graduation gaps. Commenter asserts data should be disaggregated for accountability purposes.</li> </ul> <p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Increase the target to at least 90 points using the existing graduation and completion index; and</li> <li>• Change the index to add incentives for schools to support students to reach for Standard or Advanced diplomas</li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>• Keep the target at 80 points; but also</li> <li>• Change the index to add incentives for schools to support students to reach for Standard or Advanced Diplomas; and</li> <li>• Change the index to reduce the points awarded to schools for GEDs. The final target (80 points) is closer to the points awarded for a GED (75 points) than a Standard or Advanced Diploma (100 points); and</li> <li>• Change the index to significantly reduce points awarded to schools for certificates of program completion; and</li> </ul>

		<ul style="list-style-type: none"> <li>Require high schools to reach the goals, or make significant and sustained progress, for economically disadvantaged students, students with disabilities, students with limited English proficiency, and minority students.</li> </ul>
190.	Lilli Hoffman	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
191.	Roger Lewis	Commenter supports Sarah Hopkins Finley’s article about a proposal for adding economic and/or personal finance classes for graduation requirements. Commenter supports the Virginia Board of Education’s consideration of a requirement for increased high school focus on economics and personal finance.
192.	Jeffrey Szyperski Chairman, President, and CEO Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
193.	Amy Eckard	Commenter feels that although Sarah Hopkins Finley’s article about a proposal for adding economic and/or personal finance classes for graduation requirements is a good idea the real focus should be on basic math and English.
194.	Margaret Greene	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
195.	Hunter Edwards	Commenter supports Sarah Hopkins Finley’s article about a

		proposal for adding economic and/or personal finance classes for graduation requirements. Commenter supports the Virginia Board of Education’s consideration of a requirement for increased high school focus on economics and personal finance.
196.	Dianne E. Hall, Accountant Michael B. Cooke, C.P.A., P.C.	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <p>196. Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</p> <p>197. Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.”</p>
197.	Bonnie C. Turner, CPA, FLMI Director Variable Accounting Genworth Financial	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine</li> </ul>

		Arts or Economics <i>and Personal Finance.</i> "
198.	Jennifer R. Commander, CPA Partner and Chief Financial Officer Winston Partners	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
199.	Janet A. Rivara	<p>Commenter is in favor of teaching finances to high school students. Commenter advocates for such a curriculum for special needs students. Commenter believes such instruction should actually be offered in middle school along with earlier vocational and technical options.</p>
200.	Windora Bradburn	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended</li> </ul>

		for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i> ”
201.	Rebecca Tiblin	Commenter supports the recommendations made by the Virginia Society of Certified Public Accountants to include, at the minimum, one unit of credit in economics AND in Personal Finance in graduation requirements.
202.	Derek Myers Associate Professor Emeritus Virginia Tech	Commenter requests that the Board consider adopting a combined financial literacy and basic economics curriculum as a graduation requirement for all of Virginia's high school seniors.
203.	Christine Radcliffe Haddon, CPA	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
204.	Jon Bridges	Commenter advocates for a mandatory requirement for Virginia public high school students to take/pass at least one course on Economics/Personal Finance.
205.	Jennifer L. Todd, CPA Managing Member Todd & Price, PLC	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
206.	Bradley P. Nicklin Partner Beers + Cutler	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and</p>

		<p>personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
207.	Susan Boothe Controller ST Solutions	Commenter supports regulations establishing standards for financial courses in our Virginia schools.
208.	Christine Roby	Commenter inquires into why it has taken the Board so long to establish Standard Technical and Advanced Technical diploma programs. Commenter also supports requiring all high school students take a financial literacy course
209.	Tom Rosengarth, CPA	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
210.	Melissa C. Goemann, Juvenile Law and Policy Clinic, UR Law	Commenter requests that the Board (1) increase the target to 90 points or more to promote diploma graduates and eliminate graduation gaps among student subgroups; (2) provide a small “extra credit” value to Advanced diploma-earners; (3) weight Special and Modified diplomas at 100 points; and (4) lower the value of all non diploma options

		such as GEDs and Certificates of Completion to reflect the diminished opportunities that they offer to students.
211.	Brian Johns	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
212.	Katherine B. Hoffman, President Charlottesville National Organization for Women	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
213.	Adelaide Alexander	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
214.	John Blair Reeves Sr.	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
215.	Jim & Mariett Eggleston (SOA BOX)	Commenter supports financial literacy for high school students.
216.	Lisa Cusack	Commenter requests that the Board consider adopting a combined financial literacy and basic economics curriculum as a graduation requirement for all of Virginia's high school students.
217.	Alice Cannon	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
218.	Kinne J. Hoffman	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
219.	Margaret Kertess	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials. Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter

		suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.
220.	Rebecca Slickis	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
221.	Becky Thomas	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
222.	Geraldine Woodley	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
223.	Susan Clark	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
224.	Janice Armstrong	Commenter states that special education students are capable of meeting and need to meet the same standards as all students. Commenter believes that if schools are to prepare special education children for independent living, employment, and further education the students need a high school diploma that means the same for all children. Commenter believes excusing special education students from SOL exams through portfolios has totally relieved the elementary schools of their accountability in teaching kids to read and do math. Commenter states that students who are two and three years behind in reading and math are passing advanced proficient on VGLA, but they are not being taught to read. Commenter states that graduation and a diploma should mean something and it begins in the primary reading programs.
225.	Len Dillon, President Dillon Insurance	Commenter supports requiring economics and financial literacy to graduate. Commenter believes there should not

	Agency, Inc.	only be a basic personal finance class but higher level classes as well. This class should include the basics of savings and investment, principles of interest, basic stock market knowledge and personal taxes.
226.	J. Bradley McCall, CIC, CISR, Treasurer McCall Insurance Agency, Inc.	Commenter supports requiring economics and financial literacy to graduate.
227.	Gary S. Zuckerman A&R Associates	Commenter believes that every student must pass a course in economics and personal finance as a condition of graduation.
228.	Linda A. Conner Business Development Officer & Lender American National Bank & Trust Company	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
229.	R. Michael Hedden Senior Vice President / Director of Operations Bankers Insurance, LLC	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
230.	Terrance E. Rogstad, CPA Shareholder Swart, Lalande & Associates, P.C.	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
231.	William Duval	Commenter requests that the Board change whatever laws/regulations/rules that may need to be changed to: increase graduation rates, and reward the hard work by all those thousands of children with varying degrees of disability in the accomplishment of successfully navigating

		the SOL tests. Commenter believes that children with disabilities' work should be reflected by them earning at the very minimum a standard diploma.
232.	Karen S. Killian, CPA	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include "personal finance" in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read "Fine Arts or Economics <i>and Personal Finance</i>."</li> </ul>
233.	Kelly Murphy	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
234.	Ed Brugh	<p>Commenter supports Sarah Hopkins Finley's article about a proposal for adding economic and/or personal finance classes for graduation requirements. Commenter supports teaching about all types of lending, what to avoid and what loans to seek out, including instruction on conventional mortgages, FHA mortgages, USDA mortgages, home equity loans, second mortgages, credit card loans, student loans, 90 day notes, auto loans, commercial loans, and SBA loans. Also it would be good to give instruction on life insurance, such as whole life and term life. Another item of instruction would be the development of a family budget, saving money, retirement planning, employment loss planning, college funding planning, and home ownership planning.</p>
235.	Paige T. Lilley W. T. Chapin, Inc.	Commenter does not "feel that the requirement should be either or on Economics for Financial Literacy."
236.	Andrew T. Martin, C.P.A.	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in</li> </ul>

	Corbin & Company, P.C.	<p>economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</p> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
237.	Neil Turner	Commenter requests that the Board adopt new requirements for graduation to include meaningful instruction in economics and personal finance as a requirement for graduation for all Virginia high school students.
238.	Ginny Napier Director of Guidance Poquoson HS	Commenter supports the addition of economics/personal finance to the high school graduation requirements. Commenter does not like the requirement for the standard diploma that gives students the option of a foreign language, economics, or personal finance. Commenter believes it makes no sense for one segment of the graduates to not be required to take the course, and that foreign language is certainly beneficial but it is not an appropriate substitute.
239.	Valerie R. Coley	Commenter believes in the importance of implementing incentives in the Virginia School System. Commenter states that there are children who cannot read or sound out the alphabets, but are being pushed through a system that is not helping them to even get to a point of graduation. Commenter feels the focus should be on the basics, phonics and implementation of some type of life skills/vocational training. Commenter states that every student isn't academically successful but if we place academics along with Vo-Tech there would be a change in the school system and the drop out rate.
240.	Matthew Freeman	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative

		<p>diplomas and other credentials. Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p>
241.	<p>Adrienne E. Volenik          Director, Disability Law Clinic          Acting Director,          National Center for Family Law          School of Law          University of Richmond</p>	<p>Commenter's concern with the proposal is that schools receive the same point values for awarding Special and Modified Standard diplomas as they receive when awarding Advanced and Standard diplomas. Commenter states that these diplomas put graduates at a disadvantage in the marketplace, with the military, and with four-year colleges and community colleges. Commenter states that data reveals that many special education students capable of earning Advanced or Standard diplomas are instead earning Modified or Special diplomas. Commenter states that there are no state wide guidelines as to how many may be awarded. The 2008 On-Time Graduation Results data reveals that, while students with disabilities graduate at roughly the same rate as the overall population, the type of diplomas awarded to students with disabilities varies widely across the state. Commenter asserts that this wide variability reveals that many disabled students are not given a fair opportunity to achieve to their full potential. Commenter believes that this variability can be remedied by a firm standard from the state that serves as an incentive to all school systems to help disabled students achieve the highest attainable credential. Commenter indicates that some school districts are offering special education students no opportunity to earn Standard and Advanced diplomas. Commenter asserts that by setting the graduation rate at 80 points and awarding Modified Standard and Special Diplomas 100 points, schools have no incentive to push students with disabilities to meet the "challenging expectations that have been established for all children" under the federal IDEA and Virginia regulations requiring that "every student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma." Commenter requests that the Board (1) increase the target to promote</p>

		diploma graduates and eliminate graduation gaps among student subgroups, (2) provide a small amount of “extra credit” value to Advanced and Standard diploma-earners or weight Special and Modified diplomas somewhat lower than Advanced and Standard diplomas; and (3) lower the value of all non diploma options such as GEDs to reflect the diminished opportunities that they offer to students.
242.	Ronald F. Miller President & CEO Summit Community Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
243.	Daniel G. Waetjen Group/State President Greater Washington DC Banking Region BB&T	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
244.	Jim Thomas Executive Vice President Chief Credit Officer EVB	Commenter urges the Board to require all students to take a high school economics and personal finance course to graduate.
245.	Norman Blanchard	<p>Commenter asserts that if the Standard Technical Diploma and the Advanced Technical Diploma are to be introduced, students should be able to receive more intensive and student specific instruction in math classes prior to entering the ninth grade. Commenter believes encouraging new approaches to math and science classes may help steer students toward the technical diplomas.</p> <p>For the graduation and completion index Commenter asserts that GED recipients should be rated at 85 points.</p> <p>Commenter states that the GED has undergone significant revision in recent years and should be accepted as a viable alternative to a regular diploma. Commenter believes that schools should receive more credit than proposed for preparing students to pass the GED while enrolled in high school or within a year after they have left school.</p> <p>Commenter asserts that students not graduating but still in school should receive 80 points. Commenter urges the Board to celebrate students remaining in school in order to complete their education. Commenter suggests creating a responsibility index for students, parents and community members.</p>
246.	Debbie Barnes	Commenter believes there should be something on the SOL about simple life things, such as balancing a check book, percentage rates, and money management.
247.	Heather and Barry Gale	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion

		index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials. Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.
248.	Bob Good	Commenter supports Sarah Hopkins Finley's article about a proposal for adding economic and/or personal finance classes for graduation requirements.
249.	R.R. Casanovas	Commenter states that students in elementary, middle and high school levels should receive instruction in an economics curriculum, and all levels need a basic and fundamental understanding of economics and knowledge of checkbook balancing, budgeting, saving, and investing.
250.	Elizabeth H. Nolte, CPA	Commenter urges the Board to include both personal finance and economics as a requirement for high school graduation. Commenter believes students should be well educated in financial matters with an understanding of the use of credit, banking, how to get a loan, the consequences of borrowing, how supply and demand affect pricing, the tax system, why money is deducted from their paychecks for federal and state withholding, Social Security and Medicare, how to balance a checkbook, and fill out a simple tax return.
251.	Shirley A. Gary	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
252.	Susan Proffitt	Commenter urges the Board to require all high school students take, and pass, an economics and personal finance course.
253.	Sarah Hopkins Finley Executive Director Virginia Council on Economic Education	Commenter urges the Board to require all high school students to pass an economic/personal finance course as a requirement to graduate. The Council suggests modifications to the current proposal, to achieve this without eliminating other required courses: <ul style="list-style-type: none"> <li>• For the Standard Diploma, replace one of the five elective options to require an economics/personal finance course</li> </ul>

		<ul style="list-style-type: none"> <li>• For the Advanced Studies Diploma, replace the option to take economics <i>or</i> personal finance with the requirement for a single combined course</li> <li>• For both the Standard and Advanced Technical Diplomas, students could have the option of satisfying a required economics/personal finance credit as one of the four career and technical credits or electing it as an option as currently proposed or as part of satisfying one of the social science credits. With some modification, an existing Business education course (Finance 6121) would provide a good economics/personal finance course for students.</li> </ul>
254.	Desiree Childress	<p>Commenter requests that the Board</p> <ul style="list-style-type: none"> <li>• look at and revamp the list of computer accommodations available for students with disabilities (color/filter screens, enlarged font, voice over options, reading options, and hiding icons should be standard accommodations)</li> <li>• make VGLA/VSEP offered and reviewed in each IEP during the 8th grade year</li> <li>• have avenues and supports in place for VSEP in high school</li> <li>• provide students who take the VGLA/VSEP with the opportunity to take the SOL with accommodations for practice and knowledge for higher education opportunities,</li> <li>• keep all students in a general educational setting with appropriate supports,</li> <li>• look at the curriculum framework and add multisensory learning within the scope of SOL.</li> </ul>
255.	Preston Lemon	<p>Commenter requests that the Board (1) increase the target to 90 points or more to promote diploma graduates and eliminate graduation gaps among student subgroups, (2) provide a small amount of “extra credit” value to Advanced diploma earners (3) weight Special and Modified diplomas below Advanced and Standard diplomas; and (4) lower the value of all non diploma options such as GEDs and Certificates of Completion to reflect the diminished opportunities that they offer to students.</p>
256.	Kelly Godwin - UR Juvenile Law and Policy Clinic	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Disaggregate the graduation data between white males and black males.</li> <li>• Give schools incentives to retain students.</li> <li>• Reward schools who keep students engaged.</li> <li>• Implement retention programs to keep students in school.</li> </ul>

		<ul style="list-style-type: none"> <li>• Ensure that full credit is not given for credentials that don't offer full opportunities.</li> <li>• Create incentives for early planning and high expectations.</li> <li>• Give full credit only for standard and advanced diplomas while other options are weighted according to the value to the student after high school.</li> <li>• Disaggregate graduation data about Virginia's most vulnerable students.</li> </ul>
257.	Parents of an autistic child in Blacksburg	Commenter believes guidance counselors and special education teachers need to receive better professional development for addressing the different needs of autistic children. Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials. Schools need teachers and staff who know how to help special needs students graduate with regular diplomas.
258.	Heather Tower	Commenter does not want the educational bar lowered. Commenter believes our educational standards are failing the American people.
259.	Pamela E. McIntire	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.
260.	Anne Chapin	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p> <p>Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p>
261.	Mary Wagner	Commenter feels the accreditation system should reward schools for providing instructional programs to meet the

		needs of at-risk students to help them graduate on time. Commenter requests that the Board increase the target to at least 90 points.
262.	Congressman Robert C. "Bobby" Scott	Commenter is concerned that the proposed standards do not place enough emphasis on awarding students a regular diploma. Commenter suggests that the proposed standards are too lenient in the area of alternative credentials and detract from encouraging students from pursuing regular diplomas. Commenter's second concern is that the proposed standards do not require increased graduation rates for all students especially minority and low income students. Commenter requests that the graduation rates be applied to individual groups of students and that the data be disaggregated.
263.	Sally W. Southard Chairman, Salem City School Board	Commenter requests that the Board make personal finance and economics required courses for graduation, give school divisions the flexibility to decide which teacher licensure codes are acceptable to teach these courses, and that school divisions be able to decide if the course requirements are taught as two semester 0.5 credit courses or one 1.0 credit full year course.
264.	Jan Pingel Binford Middle School	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include "personal finance" in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read "Fine Arts or Economics <i>and Personal Finance</i>."</li> </ul>
265.	Richard Paul Haigh Grafton High School	Commenter urges the Board to require all students to take a high school personal finance course to graduate that includes ethics.
266.	Frank Chimento	Commenter requests that the Board:

		<ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
267.	Kathy Bergmann Woodbridge Senior High School	Commenter requests that all students be required to take a financial literacy/economics based course for graduation. Commenter believes the existing finance course curriculum available to students in Virginia that is taught in the Business and Informational Technology departments as an elective can be updated to meet the requirements being presented.
268.	Susan Wyatt	Commenter encourages the Board to approve the proposal to incorporate economics <i>or</i> financial literacy as a one credit elective course option or a required course option of three diplomas (standard, advanced studies and standard technical).
269.	Elizabeth Pase Business and IT Instructor	Commenter requests that all students be required to have both a course in Personal Finance and a course in Basic Economic Theory. Commenter states that despite the number of credits required for graduation, seniors should be required to attend school all day unless they have employment in a co-op type job arrangement which is oriented towards a career goal. Commenter does not believe working at a fast food business meets that description. Commenter believes students, and society in general, are being done a huge disservice when the minimum required is accepted as sufficient.
270.	Richard G. Smith, CPA/ABV, Member Witt Mares, PLC	Commenter requests that the Board require a course in economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.

271.	Carolyn Meyer RN BSN	<p>Commenter states that every school should have a nurse with the ratio of 1 nurse to 750 students. Commenter believes this is necessary to address student needs such as food allergies, asthma, diabetes epilepsy, sickle cell anemia, or handicaps requiring assistance, injuries, and illness that occur during the day. Commenter believes having a non-professional staff member do this type of work is setting the schools up for liabilities. Commenter wants legislation to mandate nurses in every school with an adequate ratio of students per nurse.</p>
272.	Barbara Cullerton, CPA,Senior Manager CS&T CPAs	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
273.	Ann B. Emerson, School-to-Career Specialist Department of Instruction Stafford County Public Schools	<p>Commenter is in favor of requiring Academic and Career Plans for 8th graders. Commenter believes students need to realize that mathematical and scientific reasoning and problem-solving, analytical skills (developed in social studies), reading and writing are critical components of career and life success. Commenter believes that this goal can only be accomplished with significant career development. Commenter believes that creating bridges between these subject areas is something that career development can achieve. Commenter asserts that the state needs to ensure adequate time, attention, and funding is provided and that schools are required to do career development. Career development needs to be directed by educational professionals who are well-qualified, and not stretched between too many other tasks.</p>

<p>274.</p>	<p>Ken Bassett History and Social Sciences Office of Student Learning and Professional Development Prince William County Public Schools</p>	<p>Commenter is troubled by implementation of the <a href="#">Personal Finance objectives</a> developed in 2006. Commenter asserts that although the objectives are aligned to standards in three content areas: Mathematics, Career and Technology Education, and History and Social Sciences, the objectives are most often implemented in the 12th grade Government course. Commenter states that the history and social science curriculum community was not consulted in the creation of the standards that many of them now must teach so many 12th grade teachers report feeling inadequately prepared to teach the course. Commenter requests that the economics objectives currently found in the 12th grade US Government standards be removed from that course. Commenter’s rationale is that adding a graduation requirement that includes economics standards (apart from personal finance objectives), would be redundant given the current 2001 standards: GOVT. 14,15,16 and the 2008 revised standards: GOVT. 12,13,14,15,16. Commenter asserts that given the recent revisions of the Government standards, it may be that the Board will not entertain the suggestion of revisiting the standards. In that event, commenter wants to express support for the addition of a financial literacy course requirement that included the economics objectives with the understanding that VDOE remove those standards at the next revision cycle on the grounds that the underlying course work for the CTE endorsements for personal finance and economics are the best preparation for teaching these topics to our students.</p> <p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics and personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> <li>• Any required credit (even electives) should include a course that incorporates both economics AND personal finance, not economics OR personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. If a statewide graduation requirement in economics and personal finance is not feasible, for consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the Virginia JumpStart asks that language be amended for</li> </ul>
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		the advanced studies technical diploma to read “Fine Arts or Economics and Personal Finance.”
275.	Mike Ellerbrock Director - Center for Economic Education Agricultural & Applied Economics Dept College of Agriculture & Life Sciences, Virginia Tech	Commenter request that the Board require all high school students take a full course in economics and financial literacy as a requirement for graduation. Commenter states that the Virginia Council on Economic Education will train the Commonwealth's teachers.
276.	Dennis Winfree, CIC Horizon Insurance Services	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
277.	Helen Harman, Counseling Director, Counselor, Grades 10-12, A-G Pam Elmore, Counselor, Grades 10-12, H-M Lynn Briggman, Counselor, Grades 10-12, N-Z Jimmy Miller, Counselor, Grade 9 Spotswood High School	<p>Commenters are opposed to the addition of a new career and technical diploma option. Commenters feels that students will be faced with another decision to make at too young of an age. Commenters think it would be wise to encourage looking at the various options that currently exist without having to make a choice of diploma linked to that choice.</p> <p>Commenters believe the “tone” of the proposal is driving a wedge between those who are “college bound” and those who are on the “vocational track.” Commenters believe adding these new diploma options waters down the Standard Diploma considerably. Commenters suggest that instead of adding a Technical Diploma, make the standards of receiving the Career and Technical Seal more rigorous.</p> <p>Commenters suggests that if the Assembly is adamant on adding the Technical Diplomas then maybe the CTE seal needs to be removed altogether. Commenters feel the Board has created diplomas without consulting people in charge at the local school level. Commenters assert that the two new diplomas will put more work on counseling staffs with many already overburdened due to budgetary cuts. Commenters request that the state make the technical diplomas a local option and give the localities and systems room to be flexible in modifying the courses that are needed to meet the definition of the Career and Technical diplomas.</p> <p>Commenters assert more guidance counselor staffing is needed to implement the proposed regulations. Commenters request that the state revisit the Standards of Quality as they relate to Guidance staffing. Right now, staffing is at 350:1 student:counselor ratio at the high school level.</p> <p>Commenters assert that with an increase in the rise of mental health-related issues in young people and the existing duties of counselors, the State should not expect a counseling staff to take on additional requirements without looking at adjusting this ratio.</p>

278.	Alison Ludwig	Commenter believes it would be a waste of time and money to develop and maintain a personal academic and career plan for each seventh- and eighth- grade student. Commenter asserts that most adults are not currently doing what they planned to do when they were in 7th grade, 9th grade, or even end up doing what they planned when they're 1 year out of high school.
279.	Glory Gill, RN, BSN, MPA HCS School Nurse Wythe Elementary	Commenter requests that the Board mandate having a school nurse in each school at a ratio of 1:750 students. The No Child Left Behind Act has increased the work of nurses including trach care, increased medication administration, feeding tube care, seizure monitoring and treatment, and care of asthmatics with inhalers and nebulizers.
280.	Jenna J. Konizer	<p>Commenter supports the Standard Technical Diploma because more students would benefit from taking advantage of the excellent opportunity to begin a technical career while in high school and to graduate with marketable skills. Commenter asserts that the state should provide its share of funding for the increased costs associated with this new diploma. Commenter believes 7th grade is too early to begin a formal program like the one proposed by the Academic and Career Plan. Commenter believes that in middle school time and resources would be better spent on career information and exploration. For the Graduation and Completion Index commenter thinks the proposal to reduce point value for students that take more than 4 years to graduate is too harsh.</p> <p>Commenter believes that schools should not be punished for circumstances that schools have no control over. The emphasis should be on working as hard as we can to help students graduate, no matter what it takes. Commenter suggests that a workable compromise would be to reduce point value if students take more than 5 years to graduate.</p>
281.	Jennifer G. Cornell Executive Director Timothy P. Schilling, Associate Director Kenneth T. Berents, Chairman, Board of Directors, Powell Center for Economic Literacy Collegiate School	Commenters support the amendment of Virginia's graduation requirements to require that all students in the state complete a course in economics and personal finance in order to earn a high school diploma. Commenters encourage the Board to consider enhancing Virginia's Social Science Standards of Learning to include more emphasis on economics and to teach economics to elementary and middle school students.
282.	Torey J Edmonds/Community Liaison and Scholar VCU Clark-Hill Institute for Positive Youth Development	Commenter states that youth must be prepared by age 21 and low graduation rates signal problems up and down the developmental continuum – from birth to young adulthood.

283.	Jen Martin Business and Information Technology Teacher Strasburg High School	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and</i> Personal Finance.”</li> </ul>
284.	Steve Craig Acting Coordinator Adult HS Completion Programs Fairfax County Public Schools	<p>Commenter requests that the Board consider adding the External Diploma Program as an accreditation factor like the GED; implementing the adult high school diploma using standard credit because motivated students are being thrown out of schools when they reach their credit needs but have not passed the SOL; implementing the original approved language of the adult HS diploma again; allowing Adult HS safe harbor on the graduation rate number; giving alternative schools safe harbor on the graduation rate number; permitting Adult HS, adult GED, and EDP to pass back off time graduation points to the students last school before adult high school. To give the true picture of county success.</p>
285.	Carol Pariser (SOA Box)	<p>Commenter requests that the Board require a personal finance course for high school students to graduate.</p>
286.	James W. Brackesn, Jr. CPA	<p>Commenter is concerned that economics or personal finance would be offered as electives and that both subjects are not required. Commenter suggests that a course in economics and personal finance be required for all students to graduate.</p>
287.	J. Peter Clements President / CEO Bank of Southside Virginia	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.</p>

288.	Susan K. Floyd, CPA, MSA Faculty - Accounting College of Business JMU	<p>Commenter supports VSCPA's comments and requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics AND personal finance as a requirement for graduation for all Virginia high school students.</li> <li>• Any required credit (even electives) should include a course that incorporates both economics AND personal finance, not economics OR personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma.</li> </ul>
289.	Robert A. Blackburn Kathleen B. Blackburn	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course.</p>
290.	Bernadette J. Stowe V. P. Finance/ Human Resources Treasurer Southwestern Virginia Gas Company	<p>Commenter urges the Board to require all students to take a high school personal finance course to graduate. Commenter suggests using the curriculum of the Ramsey group: <a href="http://www.daveramsey.com/school/">http://www.daveramsey.com/school/</a></p>
291.	Annette W. Paxton Counseling Director, Sharon Cunningham, Counselor, Matthew Kinman, Counselor Broadway High School	<p>Commenters are opposed to the implementation of these two new diplomas. The goal of having students concentrate in one area is already addressed by the Career and Technical Diploma Seal and the Advanced Math and Technology Diploma Seal. Commenters assert the development of these diplomas was prepared without the input of the Career and Technology faculty and supervisors; the current proposal fails to address the issues encountered in advising and guiding students in career fields. Commenters believe the two new diplomas will result in more time counselors, students and parents must spend on making sure requirements are being met and takes away from time spent on other issues involving the career, academic, and developmental growth of our high school students. Commenters support the proposal for every high school student to take a personal finance or economics class.</p>
292.	Arthur Auerbach, CPA	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course</li> </ul>

		<p>that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</p> <ul style="list-style-type: none"> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
293.	Terry Swain	<p>Commenter advocates for teaching pragmatic personal business skills such as a student bank. Commenter requests that the Board consider requiring financial education for all grade levels, eventually including not only personal finance but also global economics, business etiquette, and other real, practical information that will benefit the people who go straight to the work force as well as those who go on to higher education.</p>
294.	Edward Schmitz Hantzmon Wiebel LLP	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
295.	Susan B. Wright	<p>Commenter supports requiring all students to take personal finance.</p>
296.	James Maxstadt	<p>Commenter supports teaching financial literacy and economics as standard components of a government course and that separating them out and establishing them as a separate course would be a mistake.</p>
297.	Tim Maloney	<p>Commenter supports requiring all students to take personal finance to graduate.</p>

298.	Patricia C. Beeson Human Resources Director Arlington Virginia Federal Credit Union	Commenter supports requiring all students to take personal finance to graduate.
299.	David L. Cox, CPA, CMA, MBA	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and</i> Personal Finance.”</li> </ul>
300.	Jon R. Maskell, CPA McPhillips, Roberts & Deans, PLC	<p>Commenter requests that the Board:</p> <p>Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</p>
301.	Gail Eisner Fisher, CPA Tax Manager PBGH, LLP	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For</li> </ul>

		consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or <i>Economics and Personal Finance.</i> ”
302.	Wright Aloba	Commenter believes the school curriculum is already loaded with finance courses and that all the schools need to do is incorporate "personal finance" chapter or chapters in the already two or three finance courses currently taught in many schools and required for accounting majors. Commenter believes additional courses are not needed.
303.	Jeffrey J. Bates, CPA	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or <i>Economics and Personal Finance.</i>”</li> </ul>
304.	Meg Gruber Earth Science Teacher Forest Park HS Prince William County Public Schools	<p>Commenter requests that the Board not implement the academic and career plan proposed in 8VAC20-131-140. Middle school aged students do not have a realistic view of what they want to be as an adult.</p> <p>Commenter fears that this tool when used by parents and their children will not be viewed as being flexible. At this age students should be exploring their options not developing a plan that many may feel they must adhere to no matter what. Commenter is concerned about who will do all of the paperwork. Teachers and guidance counselors have enough to do meeting the SOL standards in less than one school year to meet the tests, meeting local school systems requirements in testing and the data disaggregation of the county test and the resulting paperwork. Guidance</p>

		<p>counselors do not have time to work with students for all the paperwork and their responsibilities for testing and data disaggregation. This new requirement will over burden already over burdened teachers and guidance counselors. Commenter is very concerned about this unfunded mandate coming at a time, of decreasing revenue and attacks on salaries and benefits. Commenter fears that the burden of this unfunded mandate will come from her salary like everything else that the General Assembly and the Governor refuse to fund. Commenter asserts that this initiative will not better prepare our students for their future but it will overburden our already overburdened schools.</p>
305.	<p>Susan Messier, CPA Tax Partner Goodman &amp; Company</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
306.	<p>Marsha E. Frith, CPA Sells, Hogg &amp; Jones, CPAs, PC</p>	<p>Commenter supports a financial literacy program in the school system.</p>
307.	<p>Charles A. Bish, CPA Bish &amp; Haffey, PC (SOA Box)</p>	<p>Commenter urges the Board to require all students to take a high school personal finance and economics course to graduate.</p>
308.	<p>Nick Hecker Thompson, CPA Senior Consultant Veris Consulting, LLC</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma</li> </ul>

		<p>requirements.</p> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or <i>Economics and Personal Finance.</i>”</li> </ul>
309.	Mallard & Mallard CPAs, LLC	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or <i>Economics and Personal Finance.</i>”</li> </ul>
310.	JoAnn M. Wicks, CPA Verizon Business - Finance	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p>

		<ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
311.	Donald R. Pinkleton, CPA	Commenter supports requiring all high school students to take a course in economics and personal finance.
312.	Joseph D. Thornton, CPA, ABV, PFS, CFP®, CVA <u>Mitchell, Wiggins &amp; Company LLP</u>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
313.	Jennifer Kulper	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students.</li> <li>• Include a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma.</li> </ul>
314.	Beverly C. Boyer, CPA Sherman, Spero & Safarino, Ltd.	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing</li> </ul>

		<p>the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</p> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
315.	Theresa K. Noe VP Strategic Planning HCA Healthcare - Capital Division	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
316.	Brian Lee Christopher	Commenter supports requiring personal financial literacy for high school graduation.
317.	Patrice S. Elliott, CPA CIA   Assistant Controller   Department of General Services Commonwealth of Virginia (SOA Box)	Commenter supports requiring literacy (personal finance <i>AND</i> economics) as a criterion for a high school diploma.

318.	Michelle Calhoun CPA	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
319.	Robert C. Makin, CPA CFO The Dragas Companies	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
320.	Forest Fowler Principal/CTE Director Giles County Technology Center	<p>Commenter supports comments submitted at the public hearing on behalf of the Region VI Career and Technical Education Administrators group. Commenter agrees:</p>

		<ul style="list-style-type: none"> <li>• The academic rigor of each diploma should be derived from the rigor required of the standard and advanced studies diplomas.</li> <li>• The technical rigor should be derived from the requirements for a student to be a CTE program completer with a minimum of 4 credits earned in a CTE program sequence.</li> <li>• That to eliminate confusion by students, parents, employers and post-secondary institutions the diplomas should be referred to as the Standard Diploma with a Technical Concentration and the Advanced Studies Diploma with a Technical Concentration.</li> </ul> <p>Commenter supports the requirement for a student to earn an industry certification, license or occupational competency assessment <i>but only after there are appropriate assessments available in all CTE program areas and these assessments and CTE competencies have been aligned.</i> Commenter does not support the proposal to require 2 years of foreign language to earn a Standard Technical Diploma.</p> <p>Commenter believes the proposed requirements of the Standard Diploma to earn 1 credit in foreign language, economics or personal finance is sufficient and the student may take a second year of foreign language as an elective credit if they so desire. Any increase in the number of required credits to graduate makes it more difficult to schedule students in smaller schools.</p>
321.	Alexander Diederich, CPA	<p>Commenter supports the VSCPA’s comments regarding adding a financial literacy component to Virginia high school curriculums</p>
322.	Jamie Wohlert, CPA, CFE Navigant Consulting, Inc.	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard</li> </ul>

		<p>diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.”</p>
323.	<p>Melody Barackman Controller Virginia Housing Development Authority</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.”</li> </ul>
324.	<p>Cameron W. Vaughan Chief Financial Officer The Wilton Companies</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.”</li> </ul>

325.	J. Chip Broadway, CPA, MBA Vice President & Treasurer Episcopal Church Schools in the Diocese of Virginia	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.”</li> </ul>
326.	Susie Irvine Karen Klugh	<p>The AFSA Education Foundation (AFSAEF), supports requiring students to pass a personal finance course to graduate. The organization supports use of its free MoneySKILL® course, a 34-module curriculum which teaches the basics and complexities of personal finance in the content areas of income, expenses, assets, liabilities and risk management. This personal finance education could be available immediately to students’ throughout the United States without any financial burden on the schools, teachers and students. Much more must be done. Schools should start teaching these personal finance concepts in the elementary grades. Commenter advocates for requiring an entire semester course be devoted to teaching these important life skills, starting in elementary school, continuing through middle school, and finishing in high school.</p>
327.	Chad Ratliff	<p>Commenter believes, at minimum, financial literacy should have the same level of importance as art, music, or physical education in our public schools. It’s not unreasonable, however, to argue that it should even be considered part of core curriculum and included in standards-based testing. Commenter requests that the Board include a standalone personal finance course in the revised requirements for graduation.</p>
328.	William Pouch Accounting Manager	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics</li> </ul>

	ION Healthcare Corporation	<p><i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</p> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and</i> Personal Finance.”</li> </ul>
329.	Vickie M Barrow Vice President - Investments Wachovia Securities	Commenter supports Sarah Hopkins Finley’s article about a proposal for adding economic and personal finance classes for graduation requirements. Commenter supports school system having personal finance and economics as a core curriculum in all high schools
330.	Audrey Thomson (SOA Box)	Commenter supports changing Virginia's graduation requirements so that every student must pass a course in economics and personal finance as a condition of graduation.
331.	Patti Quick	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard</li> </ul>

		technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i> ”
332.	Bobby Grohs	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
333.	Robert A Krueger, CPA Alexander Randolph	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. If a statewide graduation requirement in economics and personal finance is not feasible, for consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the VSCPA asks that language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul> <p>Commenter believes that an economics and personal finance course should be listed as an option to replace the 4<sup>th</sup> year of</p>

		math for students who are not interested in pursuing math and sciences further in their college or work careers.
334.	James E. Stewart, CPA	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and</i> Personal Finance.”</li> </ul>
335.	Darius A. Johnson SVP, Chief Lending Officer Consolidated Bank & Trust Co.	Commenter supports a requirement that all students complete a finance or economics class as part of their requirements for graduation
336.	Marsha S. Shuler Senior Vice President The Federal Reserve Bank of Richmond	Commenter urges the Board to <i>require all students</i> to earn a credit focused on both economics <i>and</i> personal finance.
337.	Mary Muldoon, CPA	Commenter supports a requirement that all students complete a finance class as part of their requirements for graduation
338.	Barry L. Thomas	Commenter urges the Board to adopt a mandate for an economic class for all students.
339.	Jeff Leopold	Commenter believes it is essential that the Board require an economics/personal finance course in high schools.
340.	Karla S. Moran Group Controller Moog, Inc. Components Group	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma</li> </ul>

		<p>requirements.</p> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or <i>Economics and Personal Finance.</i>”</li> </ul>
341.	Susan Dewey, Executive Director, VA Housing Development Authority	Commenter urges the Board to make an economics and personal finance course a requirement for every high school student.
342.	Katherine Busser Executive Vice President Capital One Financial Corporation	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.
343.	Walter Ayers	Commenter supports a mandated economics/financial literacy course.
344.	Maria Rivero	<p>Commenter stated “[t]here should be high expectations for all students, not just students who are going for the standard or advanced diploma. Commenter asserts that special needs students should receive individualized instruction.</p> <p>Commenter asserts that for special education students to be successful colleges and workplaces need to recognize the modified standard diploma as being just as valuable as the standard diploma. Commenter requests that the Board increase the target for the graduation index to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p>
345.	Mark L Endries Controller, Luck Stone Corporation	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following</p>

		<p>changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or <i>Economics and Personal Finance.</i>”</li> </ul>
346.	Lorilei J. Roberts, CPA Manager PBGH, LLP	Commenter urges the Board to include as a requirement for graduation at least one credit that includes personal finance AND economics, and include such requirement for all graduates, those seeking advanced diplomas as well as those seeking the standard diploma.
347.	Carol B. Whitson College of William and Mary	Commenter supports Governor tying graduation rates to school accreditation. Commenter asserts that currently challenging special education students are counseled out of the high school graduation track. Commenter recommends that the formula be increased from 80 points to 90 points for the graduation index. Commenter believes that students earning Modified Standard Diplomas are not counted by the state as high school graduates because they do not obtain a standard high school diploma. Commenter asserts that high schools should be able to include these students as graduates, and these students should be included in the index. Commenter agrees, in theory, with the proposed plan for middle school personal academic and career plans. Commenter feels these plans, if successfully done, will require a degree of reflection, communication, and evaluation that may not be possible within the current infrastructure of public schools. Commenter asserts that it is imperative that this plan not become just another required form that does not have strong evaluative data to predict student interests or ability, nor the linkages (community-based employment/internship opportunities) which are integral to garnering long-term student and family commitment.
348.	Olin V. Hyde	Commenter supports the recommendation from the Virginia Council on Economic Education that every high school student in VA have courses in economics and personal finance.
349.	Christine W.Caskey, . Assistant Superintend Department of	Virginia Beach City Public Schools supports the proposed revisions to the regulations however, the division has concerns regarding the time-line for implementation of the

	<p>Curriculum and Instruction Virginia Beach City Public Schools</p>	<p>proposed diplomas and increased diploma requirements. The division asserts that the revisions will have a significant impact, including financial impacts, for school divisions. The proposed requirements for the technical diplomas will most likely result in an increase in teacher allocations for career and technical education, foreign language, personal finance, and economics courses. Most school divisions are currently finalizing budgets for the 2009-10 school year that are impacted by the economic downturn at the national, state, and local levels. Virginia Beach asserts that if implementation is required beginning next school year, then school divisions will have to make tough budgetary choices, despite the best interests of students, to comply with these new regulations. The proposed revision would also affect Virginia Beach's alternating A/B block schedule. The new diploma requirements would force the division to implement alternate scheduling options that ensure students are able to meet new state criteria for graduation. Revisions to the current high school schedule will have significant impacts that involve not only the instructional program, but other areas such as staffing and transportation.</p> <p>Virginia Beach City Public Schools is supportive of the new requirements for the Advanced Studies and Standard diplomas and the implementation of the Standard Technical and Advanced Technical diplomas. The division requests the state department to delay the implementation of these new requirements from the ninth-grade class of 2009-10 to the ninth-grade class of 2010-11. This delay will allow school divisions additional time to address the staffing, scheduling, and fiscal impacts.</p>
350.	<p>S. Buford Scott, Chairman, Scott &amp; Stringfellow, Inc.</p>	<p>Commenter urges the Board to require a course in economic and financial literacy for every student to graduate from high school.</p>
351.	<p>William C. Foote Officer  Aronson &amp; Company</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance,</li> </ul>

		<p>not economics <i>OR</i> personal finance.</p> <ul style="list-style-type: none"> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or <i>Economics and Personal Finance.</i>”</li> </ul>
352.	Rachel Powell	<p>Commenter urges the Board to add at least a semester long economic/personal finance course requirement for graduation.</p>
353.	Larry Hurt, CPA member VSCPA	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or <i>Economics and Personal Finance.</i>”</li> </ul>
354.	Timothy J. Kaczmariski Controller John C. Grimberg Co., Inc.	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> </ul>

		<ul style="list-style-type: none"> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
355.	Athena M. Robbins, CFP(R), CPA Carmines, Robbins & Company, PLC	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
356.	Gregory F. Lawson, CPA/ABV Senior Partner Goodman & Company, LLP	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard</li> </ul>

		technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i> ”
357.	Dan Salandro School of Business VCU	Commenter requests that the Board require a course in economics AND personal finance not a course in economics OR personal finance.
358.	Gray Rawlings Vice President Administration S&K Famous Brands, Inc.	Commenter is in favor of adding economics and personal finance requirements to the high school curriculum.
359.	Tricia Neale, CPA Thompson, Greenspon & Co. PC	Commenter encourages the Board to require courses in economics and personal finance for high school graduates.
360.	Gemma Kotula Director Christopher Newport University Center for Economic Education	Commenter feels that every student should be encouraged to have the basics of a sound financial future, and an understanding of how the economic forces of the world work. To benefit not only themselves but also every other citizen of the world.
361.	Catherine W. Howard, Ph.D. Vice Provost, Division of Community Engagement Associate Professor, Psychology Virginia Commonwealth University	Commenter encourages the Board to include a credit on economics AND personal finance. This course should be an integration of content not a choice between the two areas required for ALL students.
362.	Tammy C. Woodcock	Commenter believes that the SOL may have started out as a good idea in theory, believes “these test have become the do all and be all of our education system.” Commenter believes children are no longer taught to think but just to memorize information. Commenter advocates teaching economics and basic math. And feels this is not the case currently. Children believe the SOL and NCLB have their good points and bad points.
363.	Gladys Denzler	Commenter believes a course in economics and personal finance should be a high school graduation requirement.
364.	Paul F. Kline	Commenter emphasizes the need for financial education at the high school level. Regardless of the direction students take after high school they will need personal financial literacy and an understanding of the underlying economic principles that govern the way our entire financial system works. Commenter requests that the Board require economics and personal finance not finance OR economics

		option as a one credit course for all diplomas.
365.	Dr. Cecil Snead Director of Instruction Amy V. Cummings Coordinator of Social Studies Roanoke County Public Schools	It is the position of Roanoke County Public Schools that more time will be needed to implement the proposed standards, if approved, regarding Economics. The proposed Economics course would require the division to develop curriculum, review textbooks according to policy and procedure for doing so, and professional development for Social Studies staff in preparation for teaching the course effectively, all of which require the expenditure of funds which are short at this time. Roanoke recommends that more time be given before requiring an economics course for graduation to insure a thoughtful implementation.
366.	Steven Zanetti, NBCT Douglas S. Freeman High School	Commenter supports requiring a course in economics and/or personal finance be taught as requirement for graduation. Commenter feels it is important to require both a semester in economics and a semester in personal finance. Commenter requests that the General Assembly consider a bill that requires that all public high school students be required to pass both a semester in economics AND a semester in personal finance for graduation.
367.	Jason Mauney	Commenter urges the Board to require high school students to take at least one unit of credit in finance and economics.
368.	Dominique Way	Commenter is upset regarding how the points are distributed for different credentials for the graduation and completion index. Commenter strongly disagrees with the point values for the Certificate of Completion, GEDs, and with other point values for the Advanced and Standard diplomas being the same. Commenter suggests that the points differ significantly between Advanced and Standard Diplomas. Commenter is concerned that under the current proposal we will increase our school to prison pipeline. Students will graduate from high school and not further their education and not be able to find long-term careers; which then leads them to other means of surviving and then to our prisons. Commenter believes increasing the target to 90 points using the existing index will be a major step up for students graduating from high school.
369.	Katherine D. Smith, CPA State Controller USOncology	Commenter requests that the Board consider adding both an economics and personal finance course to the graduation requirements for high school students.
370.	Linda Rogus Executive Director Shannon Tackett Communications Officer Northwest Federal Credit	Commenter requests that the requirements for the advanced studies diploma be reworded from “economics or personal finance” to “economics and personal finance.” Commenter requests that the requirements for the standard diploma be changed from a single requirement for “foreign language,

	Union Foundation	economics, or personal finance” to two separate requirements for a foreign language and economics and personal finance.
371.	Denise J. Jones 2008-2009 President Virginia Counselors Association Heidi B. Davis, Ed.S. Executive Director, Virginia Counselors Association Virginia Career Development Association	Virginia Counselors Association (VCA), and Virginia Career Development Association (VCDA), supports the proposal to require the development and maintenance of a personal Academic and Career Plan (SLCP) for each 7th - and 8th-grade student. However, any requirement for plans should be accompanied by state or local funding to accommodate the additional staff or resources, including the professional development, required to support this process. Funding and placement of career counselors, career specialists or career coaches in all high schools is also essential to the success of the plans. Expanding this effort to the middle schools will require additional resources. Systematic training and professional development opportunities for counselors and other educators involved in the implementation are also essential.
372.	Jim Lee CPA/PFS	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
373.	Pompa Bose, CPA	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma</li> </ul>

		<p>requirements.</p> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or <i>Economics and Personal Finance.</i>”</li> </ul>
374.	Monique T. Valentine, CPA	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or <i>Economics and Personal Finance.</i>”</li> </ul>
375.	Stephanie Saunders, CPA Chair, VSCPA Educational Foundation Board of Directors	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p>

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376.	Lisa M. Murphy Attorney at Law LeClair Ryan	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
377.	Dana B. Hamel	<p>Commenter supports the position of the Council on Economic Education and the article by Sarah Hopkins Finley about a proposal for adding economic and/or personal finance classes for graduation requirements.</p>
378.	Newport News Public School Career and Technical Education Department  Barbara Smith-White Career and Technical Education Instructional Supervisor	<p>Commenters support the amendments to the various diploma options that will ensure students are directed in the right pathways to college and/or pursue their career options including:</p> <ul style="list-style-type: none"> <li>• The need for economics and/or personal finance education</li> <li>• The need to allow students to put emphasis on the career of their choice, whether they are going to college by allowing them to take more electives and required CTE courses. This will provide a more focused and structured</li> </ul>

		<p>system for all students to excel in their career goals and continue to be successful in their academic courses regardless of their IEP, class ranking or college/career interest.</p> <ul style="list-style-type: none"> <li>• The changes and addition to the diplomas with the inclusion of industry certification will make students more marketable to industry, more attractive to colleges and more career-oriented.</li> </ul>
379.	Dr. Robert G. Smith Superintendent Arlington Public Schools	<p>Arlington Public Schools opposes changes to the Standard and Advanced Studies Diploma options related to foreign language, economics or personal finance, and the addition of the Standard and Advanced Technical Diplomas.</p> <p><b>Economics or Personal Finance Course</b> The Arlington social studies curriculum infuses the economic principles at both the middle and high school levels. Economics and financial literacy objectives and lessons are incorporated into the Grade 12 U.S. and Virginia Government course. Staff development was provided to every Arlington teacher of the U.S. and Virginia Government course. In addition, Arlington has a semester elective course, <i>Personal Finance/Money Management</i> and a full-year elective course, <i>Banking, Finance, and Investments</i>. The specific requirement of a personal finance or economics course as part of the 22 credits for the Standard Diploma and the additional requirement of a personal finance or economics course to increase the number of credits for an Advanced Studies Diploma is duplicative and does not best serve the needs of students. In addition, the creation of additional requirements in personal finance and economics will result in increased costs for textbooks, professional development, and staffing.</p> <p><b>Foreign Language Option</b> The suggested change of the option of a required foreign language elective in lieu of the personal finance or economics elective to the Standard Diploma, does not best meet the needs of students. The division is troubled by the recommendation to increase the number of required courses to the Standard Diploma and add additional graduation requirements to the Advanced Studies Diploma. Students with disabilities and students whose native language is other than English are at particular risk for not graduating on time or for dropping out due to the additional requirements.</p>

		<p><b>Standard and Advanced Technical Diploma</b></p> <p>The division does not support the addition of two new diploma options, especially when students who take the additional four Career and Technical sequential courses are already eligible to receive the Career and Technical Education Seal. The seal's requirements are more rigorous than those of the proposed diploma. There are concerns around adding any additional diploma types in terms of the increased resources necessary to manage the multitude of diplomas and the potential for additional requests for other 'special diplomas.'</p>
380.	Kenneth Stewart	Commenter believes that every high school student should have a curriculum requirement for a class that teaches basic economics and personal finance
381.	Howard B. Kiser Division Superintendent Gloucester County Public Schools	Gloucester County Public Schools is in opposition to the proposed changes to the graduation requirements. The division supports adding the Career Technical Diplomas within the confines of the existing requirements for a Standard and an Advanced Studies Diploma, but not if the requirements for the Advanced Studies Diploma are increased from 24 to 26. Especially now, when localities are faced with diminishing dollars to support current programs, it seems counterproductive to add mandates that will impact staffing, programs and overall costs to implement, especially since appropriate funding will not be provided to support the proposed changes. Requests that the Board postpone the proposed revisions specifically pertaining to graduation requirements until the financial outlook is better able to support costs for adding new courses. Students should be allowed to obtain CTE diplomas only within the confines of the elective requirements that are part of the current standards and advanced diplomas. Adding economics and personal finance is needed but increasing graduation requirements at this time will have an adverse impact on staffing and support costs.
382.	Barry D. Yost, Ed. D. Washington County Public Schools Supervisor Career & Technical Education, Adult Education, and Alternative Education	Commenter states that the addition of personal finance, economics, or foreign language as a graduation requirement would cause undo financial stress on some schools and school divisions if funds are not allocated for the additional courses and/or sections. Commenter asserts that the CTE diplomas should have a credential completion for the diplomas. This will also require allocated funding at the state and federal level. These are trying economic times, and the Board needs to give strong consideration to any new proposals that would be an expense to the locality.
383.	William M. Wright, II,	Commenter requests that the Board:

	<p>CPA President, Landmark Military Media, Inc.</p>	<ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
384.	Steve Ritter	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
385.	<p>Suzanne Gallagher, Director Center for Economic Education School of Business</p>	<p>Commenter encourages the Board to require all high school students take a course in economics <i>AND</i> personal finance.</p>

	Virginia Commonwealth University	
386.	Edward J. Grenier III President and CEO Amy Marcenaro Heckman Vice President, Education and Strategic Partnerships Junior Achievement of the National Capital Area	<p>Commenter urges the Board to:</p> <ul style="list-style-type: none"> <li>• Include, at a minimum, one unit of credit in economics and personal finance as a requirement for graduation</li> <li>• Any required credit (even electives) should include a course that incorporates both economics AND personal finance, not economics OR personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma.</li> </ul>
387.	Terry E. Zerwick CPA/PFS Zerwick & Associates PLLC	Commenter supports support of inclusion of a course on economics and/or personal finance as a required course for graduation
388.	Linda and Jim Greenhager	Commenter supports Sarah Hopkins Finley’s article about a proposal for adding economic and/or personal finance classes for graduation requirements.
389.	W. A. Dennison, Jr. City Manager City of Bristol	The graduation and completion index, the Academic and Career Plan for middle school students, and the increase in other accreditation requirements will require additional staff time and resources at a time when there are cuts in state funding for virtually all programs. It is unlikely the General Assembly will fund any of the new costs associated with the proposed revisions so the costs will be borne by the local governments and local taxpayers. Commenter requests the Board not increase requirements at this point unless it eliminates other programs to offset the increased costs of the revisions, relax other, less critical standards or ties implementation to funding increases in the Standards of Quality.
390.	Bonnie Johnson County Administrator County of Bath	The graduation and completion index, the Academic and Career Plan for middle school students, and the increase in other accreditation requirements will require additional staff time and resources at a time when there are cuts in state funding for virtually all programs. The new costs associated with the regulations will be borne by the local governments and local taxpayers. Commenter requests the Board not increase requirements at this point unless it eliminates other programs to offset the increased costs of the revisions, relax other, less critical standards or ties implementation to funding increases in the Standards of Quality.
391.	Ronald Lovelace, CPA Lovelace, Norvelle, Mathews, & Crews	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for</li> </ul>

		<p>all Virginia high school students.</p> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or <i>Economics and Personal Finance.</i>”</li> </ul>
392.	John Denison Cherry, Bekaert & Holland	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or <i>Economics and Personal Finance.</i>”</li> </ul>
393.	Toby Ellison Cherry, Bekaert & Holland	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p>

		<ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
394.	Wesley Watkins Cherry, Bekaert & Holland	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
395.	William T. Berry, Jr. Cherry, Bekaert & Holland	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement</li> </ul>

		<p>verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.”</p>
396.	<p>Kurt D. Hodgen City Manager City of Harrisonburg</p>	<p>The graduation and completion index, the Academic and Career Plan for middle school students, and the increase in other accreditation requirements will require additional staff time and resources at a time when there are cuts in state funding for virtually all programs. It is unlikely the General Assembly will fund any of the new costs associated with the proposed revisions so the costs will be borne by the local governments and local taxpayers. Commenter requests the Board not increase requirements at this point unless it eliminates other programs to offset the increased costs of the revisions, relax other, less critical standards or ties implementation to funding increases in the Standards of Quality.</p>
397.	<p>James D. Campbell Executive Director Virginia Association of Counties</p> <p>R. Michael Amyx Executive Director Virginia Municipal League</p>	<p>The graduation and completion index, the Academic and Career Plan for middle school students, and the increase in other accreditation requirements will require additional staff time and resources at a time when there are cuts in state funding for virtually all programs. It is unlikely the General Assembly will fund any of the new costs associated with the proposed revisions so the costs will be borne by the local governments and local taxpayers. Commenter requests the Board not increase requirements at this point unless it eliminates other programs to offset the increased costs of the revisions, relax other, less critical standards or ties implementation to funding increases in the Standards of Quality.</p>
398.	<p>Dawn. C. Lindley, Director of Marketing and Financial Literacy, Virginia Credit Union League</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> </ul>

		<ul style="list-style-type: none"> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
399.	Locke Trigg Regulatory Compliance Analyst Bureau of Financial Institutions	<p>Commenter urges the Board to amend the proposal to require all students, not just advanced studies students to earn a credit focused on both economics <i>and</i> personal finance not economics or personal finance.</p>
400.	Ward R. Scull, III Michael H. Lane Virginians Against Payday Lending	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</li> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
401.	Bradley S. Haun, CPA	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> <li>• Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</li> </ul> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> <li>• Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance,</li> </ul>

		<p>not economics <i>OR</i> personal finance.</p> <ul style="list-style-type: none"> <li>• Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</li> </ul>
402.	Bobbie Gilbert – Business Teacher and CTE Team Leader, Waynesboro Public Schools	<p>Commenter appreciated the support for the two new diploma options. Believed the Board needs to support the administrative tasks that will be involved with the new diplomas, i.e. recordkeeping, staff, and funding for the tracking of the diploma requirements. Concerned about the consistency of the course title needed for the Advanced CTE Diploma with the Economics course. Requested that it be called Economics and Personal Finance.</p>
403.	Tom Garner – Virginia Bankers Association	<p>Commenter wanted to put a “face” to the comments that had been provided by the Virginia Bankers Association. Supported the association’s request that the Board of Education include a course on economics and personal finance in all diploma tracks instead of just the Advanced Diploma curriculum so that all students take the course.</p>
404.	Sue Wright – Coordinator of Elementary Instruction, Waynesboro Public Schools	<ul style="list-style-type: none"> <li>• Expressed support for the proposed changes to the SOA, but stated that she did not believe they will have an impact on leading Virginia’s students into the 21<sup>st</sup> Century.</li> <li>• Stated that students need to be bilingual and that language instruction needs to be a standard at the elementary level.</li> <li>• Stated that if students have an academic and career plan at the middle school level, but graduate without the imagination and creativity to solve tomorrow’s problems, the plan will be futile.</li> <li>• Proposed that all students become proficient in a musical instrument, or as part of a vocal ensemble, that students are allowed to show mastery of the SOL in an artistic form.</li> <li>• Also believed that students should be required to respond to instruction using technologies that would widen their audience by allowing interested students to submit an electronic project to the department based on a world problem. The student inventors or creators should be awarded a verified credit for their project and their solution should be shared.</li> <li>• Stated that public educators should evaluate the skills that students need for the problems that do not yet exist</li> </ul>

		<p>and put their energies there.</p> <ul style="list-style-type: none"> <li>• Stated that the proposed changes to the SOA will take money and time from educators and asked whether they will make a significant step in creating a public school system that can respond to the needs of the world.</li> </ul>
405.	Christa Pierpont – Restorative Community Foundation	<ul style="list-style-type: none"> <li>• Supported Virginia’s efforts to make graduation rates a priority for Virginia high schools.</li> <li>• Requested that the Board of Education adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</li> <li>• Requested that the board provide incentives to school systems to examine their graduation rates for each class of students (by gender, ethnicity, social economic indicators, the educational level of parents, etc.) and a strategic plan to raise all classes of students to the same graduation rate level as the most successful class of students and in keeping with the new SOA.</li> <li>• Requested that prevention grants for evidence-based practices be provided to help schools meet the standards.</li> <li>• Encouraged the Board to provide leadership in a state commissioned study and provide funding for grassroots leaders in each school to learn more about restorative practices for both prevention and addressing disciplinary matters so that model projects could be undertaken and shared with the department.</li> </ul>
406.	Laurie McCullough – Director of Instruction, Waynesboro Public Schools	<ul style="list-style-type: none"> <li>• Concerned that the required academic and career plan would divert already scarce resources away from time spent in conversation and consultation with students and their families at a time when the students are getting to know themselves as independent people with their own talents and interests and most need support, guidance and mentoring.</li> <li>• Encouraged the Board to let go of this proposed mandate and give attention instead to helping schools meet the goal of a qualified career coach in every high school in the valley.</li> <li>• Believed having a consistent graduation rate is a positive step, but encouraged the Board to make needed adjustments in the formula so that schools are not punished when they work hard to help hardworking students who want to succeed.</li> </ul>
407.	Don Blanchard – ESL Teacher, Waynesboro Public Schools	<ul style="list-style-type: none"> <li>• Opposed establishing a graduation and completion index that all schools with a graduating class would be required to meet in order to be fully accredited.</li> </ul>

		<ul style="list-style-type: none"> <li>• Requested the provision of more resources for children living in poverty in order to improve the graduation rate instead of spending money to implement the graduation and completion index.</li> <li>• Requested the allocation of more resources for children in the low socioeconomic group to give them more educational opportunities, more access to books, and increased assistance in the primary grades.</li> <li>• Requested the provision of more early intervention programs from birth through elementary school to help guide parents and their children to make informed decisions about health care, diet, and the importance of reading.</li> <li>• Remember there are a wide variety of reasons students fall behind. Don't lose sight of the bigger picture. Knowledge is most important, not how many years it took someone to graduate.</li> <li>• Supported measures to seriously address the dropout problem and advocates measures to help poor-performing students. Simply assigning an arbitrary point scale for accreditation will not solve the problem. Intervention measures are needed long before a student enters high school. Proposals focused at the high school level should reward schools for finding innovative ways to encourage students to stay in school.</li> <li>• Stated that to improve the graduation rate, the Board should focus its efforts on improving the lives of children.</li> </ul>
408.	<p>Martin Auville –  Director of Career and Technical Education and  Director of Guidance,  Rockingham County  Public Schools</p>	<ul style="list-style-type: none"> <li>• Believed the proposal for an academic and career plan is an admirable one. However, this will require more guidance services. So if this standard is implemented, it should come with additional state funding for additional counseling staff.</li> <li>• Difficult for CTE administrators and counselors to support the Standard Technical Diploma and the Advanced Technical Diploma for four reasons: <ul style="list-style-type: none"> <li>○ Technical diplomas will be viewed as vocational track and the Advanced Studies Diploma will be described as the college bound track, thus continuing the barrier between vocational and college bound programs of studies.</li> <li>○ The addition of two new diplomas will create more issues for counselors in terms of explaining the diploma options and tracking student progress toward meeting the requirements for each. With</li> </ul> </li> </ul>

		<p>the addition of these two diplomas, there will be nine choices for the completion of high school.</p> <ul style="list-style-type: none"><li>○ Additional diplomas will require more services from school counselors who are already overburdened.</li><li>○ It will be extremely difficult, if not impossible, for students who attend a regional technical center for three periods a day to schedule the required courses for the Advanced Technical Diploma.</li><li>● There is no need for the two new diplomas. The current Standard and Advanced diplomas, with the CTE seal, offer the same result. If technical diplomas must be offered, consider awarding them to the students who meet the current requirements for earning a CTE seal on the other diplomas, and then eliminate the seal.</li></ul>
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409.	<p>Billie-Jo Grant –          Doctoral student at UVA          doing research for Just          Children</p>	<ul style="list-style-type: none"> <li>• Believed that the GED point value gives too much weight to credentials that do not give students a fighting chance for future education and the work force.</li> <li>• Not advocating eliminating the GED and alternative credentials, but believes these credentials are far less valuable to students when it comes to college and workplace readiness and should not be given a point value set so close to our goals for Virginia education. 75 points is not an accurate point value for the GED on the Graduation and Completion Index.</li> <li>• Supports JustChildren’s platform and recommendations for improving the proposed graduation and completion index to ensure that we are striving to meet the highest standard possible.</li> <li>• Schools should get full credit only for Standard and Advanced Diplomas.</li> <li>• GEDs should remain options for students who would otherwise drop out, and schools should be given some credit for helping students achieve the GED. But, the final target for schools should be closer to the value of a diploma than to a GED.</li> <li>• Setting the target (80) points so close to the value of a GED (75) points may have the unintended consequence of tracking students into GED programs and less valuable diplomas who could earn a Standard diploma with the right supports and services.</li> <li>• The standard needs to be set at 95% to ensure that schools are encouraging students to graduate instead of settling for a GED.</li> <li>• Increase the target to 95 to promote diploma graduates and eliminate graduation gaps among student subgroups and/or lower the value of all non-diploma options to reflect the diminished opportunities they offer students.</li> </ul>
410.	<p>Petition          209in support          Note- Seven individuals          were listed twice as          petition signers and 27 of          the signatories also          submitted individual          written comments and/or          spoke at one or the          public hearings.</p>	<p>209 signatures were provided to support the comments of Just Children requesting that the Board:</p> <ul style="list-style-type: none"> <li>• Increase the target to at least 90 points using the existing index and change the index to add incentives for schools to support students to reach for Standard or Advanced diplomas; or</li> <li>• Keep the target at 80 points, but also change the index to add incentives for schools to support students to reach for Standard or Advanced diplomas; and</li> <li>• Change the index to reduce the points awarded to schools for GEDs. The final target (80 points) is closer to the points awarded for a GED (75 points) than a Standard or Advanced Diploma (100 points); and</li> </ul>

		<ul style="list-style-type: none"> <li>• Change the index to significantly reduce points awarded to schools for certificates of program completion and</li> <li>• Require high schools to reach the goals, or make significant and sustained progress, for economically disadvantaged students, students with disabilities, students with limited English proficiency, and minority students.</li> </ul>
411.	Julia Branch	<ul style="list-style-type: none"> <li>• Increase the target to at least 90 points or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced diplomas and fewer points for all alternative diplomas or other credentials.</li> <li>• Provide dropout prevention programs and more help for students to reach the goal of a Standard or Advanced diploma.</li> <li>• Hold schools accountable for the number of low-income students, children of color, and students with disabilities or limited English proficiency who achieve a diploma.</li> </ul>
412.	Anjernette Bowens	<ul style="list-style-type: none"> <li>• Increase the target to at least 90 points or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced diplomas and fewer points for all alternative diplomas or other credentials.</li> <li>• Provide dropout prevention programs and more help for students to reach the goal of a Standard or Advanced diploma.</li> <li>• Hold schools accountable for the number of low-income students, children of color, and students with disabilities or limited English proficiency who achieve a diploma.</li> </ul>
413.	Mary Hopson	<ul style="list-style-type: none"> <li>• Increase the target to at least 90 points or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced diplomas and fewer points for all alternative diplomas or other credentials.</li> <li>• Provide dropout prevention programs and more help for students to reach the goal of a Standard or Advanced diploma.</li> <li>• Hold schools accountable for the number of low-income students, children of color, and students with disabilities or limited English proficiency who achieve a diploma.</li> </ul>
414.	Antoinett Reed	<ul style="list-style-type: none"> <li>• Increase the target to at least 90 points or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced diplomas and fewer points for all alternative diplomas or other</li> </ul>

		<p>credentials.</p> <ul style="list-style-type: none"> <li>• Provide dropout prevention programs and more help for students to reach the goal of a Standard or Advanced diploma.</li> <li>• Hold schools accountable for the number of low-income students, children of color, and students with disabilities or limited English proficiency who achieve a diploma.</li> </ul>
415.	Sabrina Jefferson	<ul style="list-style-type: none"> <li>• Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials.</li> <li>• Provide dropout prevention programs.</li> <li>• Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school</li> <li>• Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students.</li> </ul>
416.	Sarah Chappelle	<ul style="list-style-type: none"> <li>• Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials.</li> <li>• Provide dropout prevention programs.</li> <li>• Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school</li> <li>• Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students.</li> </ul>
417.	Lshaunda Caisi	<ul style="list-style-type: none"> <li>• Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials.</li> <li>• Provide dropout prevention programs.</li> <li>• Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school</li> <li>• Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students.</li> </ul>
418.	Pia Irby	<ul style="list-style-type: none"> <li>• Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials.</li> <li>• Provide dropout prevention programs.</li> </ul>

		<ul style="list-style-type: none"> <li>• Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school</li> <li>• Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students.</li> </ul>
419.	James Bullock	<ul style="list-style-type: none"> <li>• Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials.</li> <li>• Provide dropout prevention programs.</li> <li>• Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school</li> <li>• Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students.</li> </ul>
420.	Tamara Henry	<ul style="list-style-type: none"> <li>• Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials.</li> <li>• Provide dropout prevention programs.</li> <li>• Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school</li> <li>• Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students.</li> </ul>
421.	Dionne Wilson	<ul style="list-style-type: none"> <li>• Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials.</li> <li>• Provide dropout prevention programs.</li> <li>• Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school</li> <li>• Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students.</li> </ul>
422.	Robin Ballard	<ul style="list-style-type: none"> <li>• Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials.</li> <li>• Provide dropout prevention programs.</li> <li>• Give full credit for the Standard and Advanced diplomas</li> </ul>

		<p>and weight all other options according to the value to the student after high school</p> <ul style="list-style-type: none"> <li>• Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students.</li> </ul>
423.	Angela May,	<ul style="list-style-type: none"> <li>• Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials.</li> <li>• Provide dropout prevention programs.</li> <li>• Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school</li> <li>• Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students.</li> </ul>
424.	Shanah James	<ul style="list-style-type: none"> <li>• Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials.</li> <li>• Provide dropout prevention programs.</li> <li>• Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school</li> <li>• Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students.</li> </ul>
425.	Tomorrow Page	<ul style="list-style-type: none"> <li>• Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials.</li> <li>• Provide dropout prevention programs.</li> <li>• Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school</li> <li>• Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students.</li> </ul>
426.	Janine Scott	<ul style="list-style-type: none"> <li>• Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials.</li> <li>• Provide dropout prevention programs.</li> <li>• Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the</li> </ul>

		<p>student after high school</p> <ul style="list-style-type: none"> <li>Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students.</li> </ul>
427.	Antoinette Smith	<ul style="list-style-type: none"> <li>Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials.</li> <li>Provide dropout prevention programs.</li> <li>Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school</li> <li>Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students.</li> </ul>
428.	Cora Hayes	<ul style="list-style-type: none"> <li>Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials.</li> <li>Provide dropout prevention programs.</li> <li>Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school</li> <li>Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students.</li> </ul>
429.	Denton Hayes	<p>Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials.</p> <p>Provide dropout prevention programs.</p> <p>Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school</p> <p>Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students.</p>
430.	Joy Jackson – Public Housing Association of Residents (PHAR)	<ul style="list-style-type: none"> <li>Supported Just Children’s platform to improve the numbers of Virginia’s high school students who graduate with a diploma.</li> <li>Recommended that the new state standards encourage prevention programs and early help, such as tutoring and mentoring programs.</li> <li>Recommended stronger school and family partnerships.</li> <li>Expressed a need for fairness and stated that 13% fewer African-Americans are receiving diplomas and that</li> </ul>

		<p>white students are twice as likely as black students to receive Advanced Diplomas.</p> <ul style="list-style-type: none"> <li>• Urged the Board to make sure that all students have improved graduation rates by setting targets for each of the at-risk groups and making sure that all students have the opportunities they deserve. If schools are not required to disaggregate data, then the overall performance of the full group often hides the graduation gaps for specific sub-groups.</li> </ul>
431.	Emily Dreyfus – Just Children, Parent	<ul style="list-style-type: none"> <li>• Supports the Just Children platform and recommends strengthening the current graduation rate index. By enacting a more rigorous graduation index, the Board can help remedy the following problems: <ul style="list-style-type: none"> <li>○ About one in five students doesn't earn a diploma after 4 years of high school.</li> <li>○ There are intolerable racial and economic disparities in graduation rates and in the types of diplomas awarded to students in the NCLB sub-groups.</li> <li>○ White students are about twice as likely as black students to earn an advanced diploma in four years.</li> <li>○ Fewer than half of the students with disabilities earn Standard or Advanced Diplomas, even though the majority of them do not have intellectual disabilities.</li> </ul> </li> <li>• Recommend including a rigorous graduation index to help encourage more students towards Standard and Advanced diplomas, which will facilitate more collaboration between families and schools.</li> </ul>
432.	Robin Crowder, Division Superintendent, Waynesboro Public Schools	<ul style="list-style-type: none"> <li>• Recommended that the Board consider providing an online course in personal finance for no credit that students could take without having to fit it into their regular class schedule. Students would receive a certificate upon completion of the course. This program has worked well in Waynesboro.</li> <li>• No additional support staff members are offered to assist with the finance class. Does not believe there will be enough funds for local school divisions to hire an additional staff member to teach personal finance. Therefore, requested that this provision be postponed at this time.</li> <li>• Guidance counselors have knowledge about students going to college, but do not know as much about students going into the world of work. Recommended that the Board begin considering career coaches who</li> </ul>

		could also assist parents and students who do not know how to access the educational system.
433.	Sarah Martin – CTE Administrator	The proposed Technical Diplomas lack rigor in the validation of knowledge and skills related to content and lack the rigor of the current Standard Diploma with a CTE seal. What is missing is a means to validate the students’ knowledge and skills. She recommends that the Standard Technical Diploma requires students, at minimum, to maintain a “B” average or better in the CTE courses and obtain an industry credential related to content.
434.	John Ledgerwood – Virginia Association of Career and Technical Education	When the bill was signed, it was stated that the Technical Diploma should meet or exceed the current diploma requirements. The proposed Technical Standard Diploma does not. He recommends that the Board of Education (BOE) infuse the quality and validation insurances that currently exist with a CTE seal on a Standard Diploma. Also recommends restoring the six electives that are in the current Standard Diploma to the Standard Technical Diploma by requiring 23 credits overall. This would allow students to complete a two-three credit foreign language sequence and a career pathway.
435.	David Holleran – Superintendent for Mathews County	Educators in Virginia have met and exceeded the goals the BOE has established with inadequate State funding and a teacher work force with salaries well below the national average. As budget cuts as high as 20 percent are predicted for school districts, he urged the BOE not to pass any new mandates and relax others. Otherwise, education in Virginia will stall chasing unfunded mandates instead of focusing on instruction for the state’s children.
436.	Jessica Thompson – Just Children	There are unacceptable performance gaps in Virginia’s graduation rates. Despite a 2008 overall on-time graduation rate of 81%, only 69.3% of disadvantaged students graduated on time. Minorities also graduated below the overall levels. There is a nearly 13 percentage point gap between White and Black students and a 15.3 percentage point gap between White and Latino students. She recommends raising the target to at least 90 points.
437.	Sarah Geddes – Just Children	Encourages the BOE to raise the target for full accreditation from 80 points to 90 points and to reconsider the index to add incentives for schools to plan early and support students in achieving their full potential. She also submitted Just Children recommendations: <ul style="list-style-type: none"> <li>• Increase the target to at least 90 points using the existing index; and</li> <li>• Change the index to add incentives for schools to support students to reach for Standard or Advanced</li> </ul>

		<p>Diplomas;</p> <ul style="list-style-type: none"> <li>• Or</li> <li>• Keep the target at 80 points; but also</li> <li>• Change the index to add incentives for schools to support students to reach for Standard and Advanced Diplomas; and</li> <li>• Change the index to reduce the points awarded to schools for GEDs. The final target (80 points) is closer to the points awarded for a GED (75 points) than a Standard or Advanced Diploma (100 points); and</li> <li>• Change the index to significantly reduce points awarded to schools for certificates of program completion; and</li> <li>• Require high schools to reach the goal, or make significant and sustained progress, for economically disadvantaged students, students with disabilities, students with limited English proficiency, and minority students.</li> </ul>
438.	Joyce Beamon – Norfolk Public Schools	<p>On behalf of Norfolk Public Schools, she supports the following recommendations of the Virginia Association for Career and Technical Education:</p> <ul style="list-style-type: none"> <li>• That Technical Diploma options include the requirements for a CTE seal and opportunities for dual enrollment credit with community colleges.</li> <li>• That, whenever possible and appropriate, work force readiness skills and industry credentials or assessments are a recognized component of the Technical Diploma and Advanced Technical Diploma.</li> </ul>
439.	Lynne Mallory-Winter Edgewater Asset Management and board member of VCEE	<p>Urged the Board to make an economics and personal finance course required for high school graduation as these are skills that will change students’ lives. Students will have the opportunity to protect themselves and increase their own productivity in whatever endeavor they set for themselves. Most states have a required course for high school graduation.</p>
440.	Joseph Johnson - New Horizons Regional Education Center	<p>Supports the development of the technical diplomas. He suggests that we clarify “CTE courses” by changing it to read “credits in CTE courses.” He also suggests that we change “CTE concentration” to “career pathway.”</p>
441.	Glen Birch - Virginia Credit Union	<p>Implement a one credit requirement for all Virginia high school students in Economics <u>and</u> Personal Finance. Too many citizens are misinformed about finances. Economics and personal finance go together and should be mandatory for all students.</p>
442.	Linwood Christian - Petersburg Advocates for Children/Parent	<p>Many parents in Petersburg care passionately about the future of their children and attention to graduation rates is long overdue. Supports the Just Children recommendations:</p>

		<ul style="list-style-type: none"> <li>• Increase the target to at least 90 points using the existing index; and</li> <li>• Change the index to add incentives for schools to support students to reach for Standard or Advanced Diplomas;</li> <li>• Or</li> <li>• Keep the target at 80 points; but also</li> <li>• Change the index to add incentives for schools to support students to reach for Standard and Advanced Diplomas; and</li> <li>• Change the index to reduce the points awarded to schools for GEDs. The final target (80 points) is closer to the points awarded for a GED (75 points) than a Standard or Advanced Diploma (100 points); and</li> <li>• Change the index to significantly reduce points awarded to schools for certificates of program completion; and</li> <li>• Require high schools to reach the goal, or make significant and sustained progress, for economically disadvantaged students, students with disabilities, students with limited English proficiency, and minority students.</li> <li>• Require achievement in at-risk subgroups and eliminate the graduation gaps.</li> </ul>
443.	Tarrika Brown (Letter) - Student, Petersburg High School	Glad the Board is proposing to add graduation rates to the SOA but needs to do more. Way too many students in Petersburg are being told they should just get a GED. GEDs are good for some students but they should not be the main option. Certificates of completion are practically useless. The proposal sends a message that it is OK for large numbers of students to leave school without a diploma. That's not right.
444.	John M. Carter - Parent/Virginia Council on Economic Education (Public Hearing)	Implement a one credit requirement (year-long course) for all Virginia high school students in Economics <u>and</u> Personal Finance. Too many citizens are misinformed about finances. Economics and personal finance go together and should be mandatory for all students.
445.	Tina Lambert - Virginia Society of CPAs/Virginia JumpStart	Implement a one credit requirement for all Virginia high school students in Economics <u>and</u> Personal Finance. Too many citizens are misinformed about finances. Economics and personal finance go together and should be mandatory for all students. Include personal finance as an elective for the advanced technical diploma.
446.	Frances Patterson - Substitute Teacher/Petersburg	Wants to start a non-profit organization to support students in danger of dropping out. Supports the Just Children proposals to:

		<ul style="list-style-type: none"> <li>• Change the index to add incentives for schools to support students to reach for Standard and Advanced Diplomas; and</li> <li>• Change the index to reduce the points awarded to schools for GEDs. The final target (80 points) is closer to the points awarded for a GED (75 points) than a Standard or Advanced Diploma (100 points); and</li> <li>• Change the index to significantly reduce points awarded to schools for certificates of program completion;</li> </ul>
447.	Andrew Schoeneman - Just Children Legal Aid Justice Center	<ul style="list-style-type: none"> <li>• Increase the target to at least 90 points using the existing index; and</li> <li>• Change the index to add incentives for schools to support students to reach for Standard or Advanced Diplomas;</li> </ul> <p>Or</p> <ul style="list-style-type: none"> <li>• Keep the target at 80 points; but also</li> <li>• Change the index to add incentives for schools to support students to reach for Standard and Advanced Diplomas; and</li> <li>• Change the index to reduce the points awarded to schools for GEDs. The final target (80 points) is closer to the points awarded for a GED (75 points) than a Standard or Advanced Diploma (100 points); and</li> <li>• Change the index to significantly reduce points awarded to schools for certificates of program completion; and</li> <li>• Require high schools to reach the goal, or make significant and sustained progress, for economically disadvantaged students, students with disabilities, students with limited English proficiency, and minority students.</li> </ul>
448.	Courtney Fleming - Virginia Bankers Association	Implement a one credit requirement (year-long course) for all Virginia high school students in Economics <u>and</u> Personal Finance. Too many citizens are misinformed about finances. Economics and personal finance go together and should be mandatory for all students.
449.	Linda Moore - A Voice for GAP Kids	<p>The SOA draft doesn't go far enough. It doesn't address:</p> <p>Drop-out prevention – schools should be rewarded for keeping students engaged in school.</p> <p>Diplomas – gives full credit for credentials that don't offer full opportunities. GEDs, certificates, special diplomas and modified standard diplomas are not as highly valued in the world of work. Only standard and advanced studies diplomas should carry full credit. Other options should be weighted according to their value to the student.</p> <p>Disaggregation – disaggregating graduation data about Virginia's most vulnerable students is key to ensuring</p>

		success for all.
450.	Elle Merkele - The P.L.A.C.E. Group (Parent Leaders Advocating for Children's Education)	<p>Would like to see the new standards address:</p> <p>Drop-out prevention – schools should be rewarded for keeping students engaged in school.</p> <p>Diplomas – gives full credit for credentials that don't offer full opportunities. GEDs, certificates, special diplomas and modified standard diplomas are not as highly valued in the world of work. Only standard and advanced studies diplomas should carry full credit. Other options should be weighted according to their value to the student.</p> <p>Disaggregation – disaggregating graduation data about Virginia's most vulnerable students is key to ensuring success for all.</p> <p>Also, recommends adoption of the Just Children proposal.</p>
451.	Tarcis White - Legal Aid Justice Center	<p>Would like the Board to take a stronger stand on promoting graduation by:</p> <p>Reward schools that keep students engaged and implement retention programs to reduce dropouts.</p> <p>Do not give full credit for credentials that do not offer full opportunities (i.e., GED, Certificates of Program Completion, Special Diplomas, and Modified Standard Diplomas.)</p> <p>Help increase graduation rates for Virginia's most vulnerable students and disaggregate graduation data for these students.</p> <p>Expressed concern for students of low-income parents.</p> <p>Supports Just Children proposal.</p>
452.	Sean McKenna, Pediatrician - Legal Aid Justice	<p>Supported comments from the Legal Aid Justice Center.</p> <p>Also, cited statistics that show a correlation between health, insurance rates, income and gaps in on-time graduation rates and drop-out rates.</p>
453.	Emma Yackso (Letter) Charlottesville High School Student	<p>The Board's current proposal endorses low expectations. Schools could encourage students into lower-achieving programs and still meet the graduation targets. She has witnessed many students because they were not encouraged by the school system, have not lived up to their academic potential. Also, the proposal includes no plan to close the gap in graduation rates for racial and socioeconomic groups. The draft must be amended in order to provide each student with the best academic experience possible.</p>
454.	John Vincie, III, CPA Virginia Society of Certified Public Accountants	<p>The requirements for graduation should include, at a minimum, one unit of credit in economics <u>and</u> personal finance. Any required credit should include course that incorporates both economics and personal finance. Personal finance should be reflected in the elective requirements for</p>

		the Advanced Studies diploma.
455.	Jack D. Dale, Superintendent Fairfax County Public Schools	<p>The addition of the economics or personal finance option will place a burden on school divisions during a time of unprecedented budget reductions. There could be an additional burden placed on Advanced Placement (AP) or International Baccalaureate (IB) diplomas. The financial literacy objectives could be blended with Fairfax County’s existing American Government course to alleviate this burden.</p> <p>The proposed requirements for the technical diplomas are less rigorous than the requirements of the Career and Technical Education Seal that is currently available. Because of the absence of rigor and because of the short-term and long-term ramifications of adding two new diplomas, Fairfax County Public Schools (FCPS) cannot support the two technical diplomas.</p> <p>There are concerns regarding the 26 credit requirement for the Advanced Studies diplomas. FCPS high school students currently operate on a seven-period day, which allows students to earn up to 28 credits. With budget constraints, this situation and other instructional areas may be scrutinized. If FCPS had to return to a six-period day, then only students enrolled in high-school courses at the middle-school level could earn the 26 credits.</p>
456.	Byron Hinton, Chairman – Stafford Career and Technical Education Committee	The proposed Technical Diplomas lack rigor. This is not the time to “dummy down” expectations, given that more students are seeking technical backgrounds and given the emphasis on Science, Technology, Engineering, and Mathematics (STEM). The committee supports the proposal put forward by the Virginia Association of Career and Technical Education, which supports higher mathematics, history, social sciences, and foreign languages.
457.	Cecilia Kuhn – Representing Self	The commenter supports education in personal finance and economics. Financial literacy is needed for youth.
458.	Joe Clement – Representing Self	Economics education is important. An easy answer to providing economics education is to have an end-of-course Government test that incorporates economics principles. Commenter supports Dr. Dale’s comment to blend government coursework with financial literacy. There is room for providing a semester of economics in existing government courses.
459.	Dorothy Schoeneman Representing self	Commenter support for the Just Children proposal. Commenter supports the use of a graduation and completion index. Diplomas, not credentials, lead to higher achievement.

460.	Nancy Tubbs – Legal Services of Northern Virginia (LSNV)	LSNV supports the graduation and completion index proposed by the Virginia Board of Education. LSNV requests that the Board reconsider its target of 80 points and/or the index. The target is set too low relative to the point values of various diploma options. The target should be raised from 80 to 90 or the mix of points needed to achieve the target should be changed. LSNV also requests that the Board require high schools to make significant yearly progress in raising the graduation rate for every at-risk subgroup of students.
461.	Elizabeth Schneider – Representing Self	Commenter supports the graduation and completion index. The proposal would bring greater alignment to state accreditation and federal accountability systems. Commenter cited the Louisiana Board of Education’s adoption of a Graduation Index as an example of a system that rewards schools for keeping all students enrolled and ensuring that they graduate and do not drop out. Because of unintended consequences, the commenter has asked the Virginia Board of Education to give additional thought to some of the details of the index. Disaggregation by subgroup is needed so that there are incentives for students to succeed. The commenter supports the Just Children proposal to modify the index to give less weight to GEDs.
462.	Liane Rozzell – Families and Allies for Virginia’s Youth	The assignment of 75 points to the GED in the proposed graduation and completion index gives schools an incentive to track students toward a GED, even when they could earn a diploma. Expectations and incentives for diplomas should be raised. The accreditation standards should require schools to disaggregate graduate data. This will give schools a greater ability to target supports to struggling students. The current graduation and completion index sets expectations too low.
463.	Jennifer Platt – Representing Self	Commenter supports an economics/personal finance requirement in high school. Commenter urges careful consideration of the graduation and completion index and college preparatory programs because of the implications toward mediocrity influencing the under-achieving student subgroups.
464.	Edgar Aranda – Legal Aid Justice Center	Commenter supports the concept of the graduation and completion index. The graduation rate data need to be disaggregated by subgroup as an incentive for schools to raise graduation rates. The graduation and completion index gives too much weight to GED and Certificates of Completion. The commenter supports the Just Children platform.

<p>465.</p>	<p>Brenda Long- Virginia Association for Career and Technical Education (VACTE)</p>	<p>The proposed Standard Technical Diploma requirements do not exceed the Standard Diploma requirements. It should not be a lesser than diploma.</p> <p>With the proposed Standard Technical Diploma a student with such a diploma enrolling in a community college would likely be required to enroll in remedial math courses to meet placement requirements.</p> <p>The proposed Standard Technical Diploma requires four CTE credits but does not require a career concentration or specialization. VACTE recommends the diploma include course requirements that meet a CTE concentration or specialization, requirements for the CTE seal, requirements for an industry, credential or assessment, and that the student become a CTE completer.</p> <p>VACTE recommends the following credit requirements for the Standard Technical Diploma:</p> <ul style="list-style-type: none"> <li>English – 4 standard credits; 2 verified credits</li> <li>Mathematics - 3 standard credits;1 verified credit</li> <li>History and social science – 3 standard credits; 1 verified credit</li> <li>Health and physical education - 2 standard credits</li> <li>Foreign language – 2 standard credits with curriculum based on conversational language for work force readiness.</li> <li>Science – 3 standard credits; 1 verified credit; courses include chemistry, biology, and the third science related to the CTE pathway.</li> <li>CTE – 4 standard credits; courses must include a career concentration or specialization. For concentrations that require less than four courses students must complete additional courses that are related to the career concentration. Students must complete a CTE program sequence and pass an examination or occupational competency assessment in a CTE field that confers certification or an occupational competency credential from a recognized industry or trade or professional association or acquire a professional license in a CTE field.</li> <li>Electives – 2 standard credits</li> <li>Student selected assessment – 1 verified credit</li> </ul> <p>CTE seal would be required and would be awarded to students who earn either the Standard Technical Diploma or Advanced Technical Diploma.</p> <p>Advanced Math or Technology seal would be awarded to students who earn Standard Technical Diploma or Advanced Technical Diploma.</p>
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466.	Barbara Taylor-Center for Economic Education at Virginia Tech	<p>The proposed revisions should require that all students take economics and personal finance not just students seeking an advanced diploma.</p> <p>The proposed revisions should require a year long</p>

		<p>economics and personal finance course. The language should not provide for economics or personal finance. Supports Sarah Hopkins Finley’s article about a proposal for adding economic and personal finance classes for graduation requirements.</p>
467.	Melinda Robinett – Director of Special Education for Wythe County Public Schools	<p>For special education students, IEP teams, not schools determine the student’s diploma tracks. The weighted points for diplomas penalize schools that do not make the diploma track decision.</p> <p>Special education students have an emphasized role in transition planning. The weighted points for diplomas penalize schools that do not make the diploma track decision. The weighting of diploma status also creates an unnecessary tension with other DOE identified initiatives. The IEP does not dictate testing modifications and accommodations for the GED. Separate justification must be submitted to GED test officials who make the decision about allowable test accommodations.</p> <p>The weighted points penalize schools for student and family choices.</p> <p>GEDs should not be weighted less than the Standard Diploma.</p> <p>For the state special education performance plan only standard or advanced studies diplomas are terminal degrees. This means all other exit degrees are counted as zeros and factored into the indicator percentage report as zeros. The result is the calculation for the indicator is artificially lowered. The 75 points for GEDS is an additional penalty for the same “perceived crime.”</p>
468.	LaDonna Meade – Director of Instruction, Wythe County Public Schools	<p>A GED is not a perfect solution but it may be the only solution for some kids, and some parents insist on a GED despite being advised of the importance of a diploma. Schools should not be penalized for GEDs as under the proposed revisions.</p> <p>The GED changed in 2002 and is now harder. Reconsider 75 points for GED earners, and view them as diploma earners at 100 points.</p>
469.	Rick Weaver – CTE supervisor, Montgomery County Public Schools	<p>To make the new diploma options attractive to students and parents and to ensure they are understood by colleges, universities, and business and industry the diplomas should be referred to as the Standard Diploma with a Technical Concentration and Advanced Studies Diploma with a Technical concentration. Also adding the name of the CTE concentration to the diploma would add further value.</p> <p>The academic rigor of the technical diplomas should mirror the Standard and Advanced diplomas.</p>

		Asking parents to choose between an Advanced Studies Diploma and an Advanced Technical Diploma is not wise, and will continue to advance the notion that technical education and academics are an “either or” proposition rather than a combination for success.
470.	Buckey Boone – Southwest Virginia Legal Aid Society	<p>Raise the 80 point base on the graduation and completion index in the near future to challenge schools to do better. Examine the weighted points for GEDs and Certificates of Completion because they may encourage schools to channel students into these options. If the percentage of GEDs and Certificates of Completion increase after the change is implemented then the weight should be lowered.</p> <p>Make greater use of the data that is now available to evaluate schools, to not only analyze schools’ performance by the type of diploma but also by categories of students. Schools should be pushed to graduate more students with an advanced studies diploma and encourage them to succeed with all groups of students.</p> <p>The Board should develop a formula that will encourage and reward schools that not only improve their graduation rates but also improve the rate of advanced studies diplomas and decrease the discrepancy between the overall rates and the rates for low income students or students with disabilities. Reconsider the requirement for three years of foreign language for the Advanced Technical Diploma. This requirement may preclude some students from attempting this degree even though they are taking rigorous CTE programs because they do not have the academic time or inclination to take a foreign language.</p>
471.	Hank Bostwick-Legal Aid Society of Roanoke Valley.	<p>Concurs with Melinda Robinette’s comments.</p> <p>The primacy on IEP team decisions on diplomas and the points of the index may be contrary to that decision making authority.</p> <p>Revise the points for GEDs. The proposed points will cause students to be diverted into GED tracks.</p> <p>Certificates of completion preclude rural and inner city kids from joining the military.</p>
472.	Curtis Hicks – Region IV CTE Administrators, Virginia Association of Career and Technical Administrators	<p>To make the new diploma options attractive to students and parents and to ensure they are understood by colleges, universities, and business and industry the diplomas should be referred to as the Standard Diploma with a Technical Concentration and Advanced Studies Diploma with a Technical concentration. Also adding the name of the CTE concentration to the diploma would add further value.</p> <p>The academic rigor of the technical diplomas should be derived from the rigor required in the Standard and</p>

		<p>Advanced diplomas. The technical rigor should be derived from the requirements for a student to be a completer in a CTE area in addition to the requirements for certification in their area of specialization.</p> <p>Asking parents to choose between an Advanced Studies Diploma and an Advanced Technical Diploma is not wise, and will continue to advance the notion that technical education and academics are an “either or” proposition rather than a combination for success.</p>
473.	C. Wayne Adkins Member City of Salem School Board	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.</p> <p>All students should be required to complete at least a semester course in financial literacy basics prior to graduation.</p> <p>Financial literacy and economics should not be an elective. School divisions should have flexibility in meeting financial literacy requirements by including in the regulations a one credit unit course in economics and personal finance, a one-half credit unit in economics and a one-half credit unit in personal finance or a one-half credit unit in personal finance and a one-half credit unit in an advanced study of personal finance.</p>
474.	Alan Siebert – Superintendent, Salem City Public Schools	<p>Requests that identical language is used regarding the requirements in each diploma type.</p> <p>Requests that flexibility in meeting financial literacy requirements be granted as to whether a one credit course or a combination of one-half credit courses be permitted to meet the requirement.</p> <p>Requests that for new requirements there be flexibility regarding teacher licensure codes permitted to teach these courses.</p> <p>Financial literacy skills should be required for all children; provided with a coherent course sequence; and that local school divisions should have reasonable flexibility in establishing, naming, and staffing courses.</p>
475.	Alan Hawthorne – Executive Director, Joint Industrial Development Authority of Wythe County (Did not speak at the hearing but provided written comment.)	<p>Supports the efforts of the Board to enhance CTE through development of the technical diplomas that enhance the value of technical education and ensure rigor in the preparation for a technical career.</p> <p>Encourages the inclusion of a credit requirement that includes the option for economics or personal finance courses.</p>

The following comments were received after the close of the official comment period. However, due to growing budgetary concerns they have been included:

	<b>Commenter</b>	<b>Comment</b>
476	Poquoson City Public Schools-Kerry Knowlton Chair of School Board	The division recognizes the value of the revisions. Requests postponement of the new regulatory requirements until the 2009-2010 fiscal year. Expressed concern about finding funds for new courses and the additional work for staff during a difficult period. A reduction in force may become necessary due to budget cuts resulting in staff having larger work loads in addition to adding the work of new regulatory requirements. With limited staff and limited resources existing programs may be at risk. The new regulations will add costs to school divisions both in terms of dollars and staff time. It does not make sense to add to the current budget crisis by asking school divisions to do more with less funding.
477	Alleghany County Public Schools – Randall Tucker, Chair of School Board	Requests the Board of Education to work with the General Assembly to postpone approval and/or implementation of the revised SOA, and to evaluate the appropriateness of all SOA requirements in light of budget reductions. Those regulations that provide sanctions against school divisions should be suspended until the state is able to fulfill its obligation to support at least 50 percent of the prevailing costs for all requirements. While it supports the revisions, the division notes that they will require additional staff time and resources at a time of significant state reductions in basic aid to public education. Without new funding the revisions result in unfunded mandates. Also requests postponement of the revised mathematics Standards of Learning until 2010 or until adequate funding is provided for staff development and new text materials. Requests the Board to send a letter to the U.S. Secretary of Education requesting an executive order suspending the No Child Left Behind’s four point increase in average measurable objectives.
478	Wesley Robinson	Objects to the revisions to the Special Education Regulations.0
479	Kevin Carey	Supports a course in economics and financial literacy.
480	R. Darryl Holland, President Virginia Association of Agricultural Educators	Supports adding units, lessons, or competencies in economics and personal finance into existing curriculum rather than requiring a new one credit course. If a new course is required commenter suggests including “all aspects of industry” in such a course and removing it from the career and technical education area.
481	William Brune	Supports a course requirement in economics and personal finance.
482	Tammy Greggs	Objects to the lack of funding for public education in

		Gloucester County.
483	King William County Public Schools- Mark Jones, Superintendent	Requests that the Board postpone the proposed revisions specifically pertaining to graduation requirements until the financial outlook is better able to support costs for adding new courses. Students should be allowed to obtain CTE diplomas only within the confines of the elective requirements that are part of the current standards and advanced diplomas. Adding economics and personal finance is needed but increasing graduation requirements at this time will have an adverse impact on staffing and support costs. The division also objects to increasing the credit requirements for the Advanced Diploma from 24 to 26.
484	Roanoke County Superintendent, Lorraine Lange, Superintendent	Requests that the Board postpone the proposed revisions specifically pertaining to graduation requirements until the financial outlook is better able to support costs for adding new courses. Students should be allowed to obtain CTE diplomas only within the confines of the elective requirements that are part of the current standards and advanced diplomas. Adding economics and personal finance is needed but increasing graduation requirements will have an adverse impact on staffing and support costs.
485	Superintendents' Study Group Region 2- Isle of Wight, Accomack, Franklin, Newport News, Poquoson, Southampton, Virginia Beach, York, Chesapeake, Hampton, Norfolk, Northampton, Portsmouth, Suffolk, and Williamsburg-James City.	The superintendents of the Region 2 school divisions request that the board delay proposed changes to the Standards of Accreditation and the Standards of Quality that are not being fully funded by the General Assembly. The superintendents support additional positions and increased rigor but request that the proposal be delayed until the economy improves. They request postponement of implementation of any unfunded mandates until the General Assembly provides sufficient funding to enable divisions to meet increased accountability standards.
486	Newport News Public Schools – Ashby Kilgore, Superintendent	The proposed amendments will require additional staff time and resources when, due to the revenue shortfall it is unlikely the state will provide its share of funding for new programs. Adding new requirements with budget reductions may cause effective programs to be lost. The question of costs needs to be answered before proceeding any further with the proposal. The division urges the Board to take great care in establishing another requirement for accreditation such as the graduation and completion index. Students who stay in school should receive more points than a student that earns a GED.
487	Danville Regional Foundation Board of Directors	Supports economics and financial literacy for all students.





***REGULATIONS ESTABLISHING  
STANDARDS FOR ACCREDITING  
PUBLIC SCHOOLS IN VIRGINIA***

***8 VAC 20-131.***

***(REVISIONS FOR CONSIDERATION BY THE BOARD OF EDUCATION –  
FEBRUARY 19, 2009)***

***Adopted by the Board of Education  
May 24, 2006  
Effective September 7, 2006***

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8 VAC 20-131-5. Definitions.

The following words and terms apply only to these regulations and do not supersede those definitions used for federal reporting purposes or for the calculation of costs related to the Standards of Quality (§§ 22- 253.13:1 et seq. of the Code of Virginia). When used in these regulations, these words shall have the following meanings, unless the context clearly indicates otherwise:

“Accreditation” means a process used by the Virginia Department of Education (hereinafter “department”) to evaluate the educational performance of public schools in accordance with these regulations.

“Additional test” means a test, including substitute tests approved by the Board of Education that students may use in lieu of a Standards of Learning test to obtain verified credit.

“Class period” means a segment of time in the school day that is approximately 1/6 of the instructional day.

“Combined school” means a public school that contains any combination of or all of the grade levels from kindergarten through grade 12. This definition does not include those schools defined as elementary, middle, or secondary schools.

“Elementary school” means a public school with any grades kindergarten through five.

“Eligible students” means the total number of students of school age enrolled in the school at a grade or course for which a Standards of Learning test is required unless excluded under the provisions of 8 VAC 20-131-30 F and 8 VAC 20-131-280 D relative to limited English proficient (LEP) students.

“Enrollment” means the act of complying with state and local requirements relative to the registration or admission of a child for attendance in a school within a local school division. This term also means registration for courses within the student’s home school or within related schools or programs.

“First time” means the student has not been enrolled in the school at any time during the current school year (for purposes of 8 VAC 20-131-60 with reference to students who transfer in during the school year).

“Four core areas” or “four core academic areas” means English, mathematics, science, and history and social science for purposes of testing for the Standards of Learning.

“Graduate” means a student who has earned a Board of Education recognized diploma, which includes the Advanced Studies, Advanced Technical, Standard, Standard Technical, Modified Standard, Special, and General Achievement diplomas.

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“Homebound instruction” means academic instruction provided to students who are confined at home or in a health care facility for periods that would prevent normal school attendance based upon certification of need by a licensed physician or a licensed clinical psychologist.

“Locally awarded verified credit” means a verified unit of credit awarded by a local school board in accordance with 8 VAC 20-131-110.

“Middle school” means a public school with any grades 6 through 8.

“Planning period” means one class period per day or the equivalent unencumbered of any teaching or supervisory duties.

“Recess” means a segment of free time exclusive of time provided for meals during the standard school day in which students are given a break from instruction.

“Reconstitution” means a process that may be used to initiate a range of accountability actions to improve pupil performance, curriculum, and instruction to address deficiencies that caused a school to be rated Accreditation Denied that may include, but not be limited to, restructuring a school’s governance, instructional program, staff or student population.

“School” means a publicly funded institution where students are enrolled for all or a majority of the instructional day and:

1. Those students are reported in fall membership at the institution; and
2. At a minimum, the institution meets the pre-accreditation eligibility requirements of these regulations as adopted by the Board of Education.

“Secondary school” means a public school with any grades 9 through 12.

“Standard school day” means a calendar day that averages at least five and one-half instructional hours for students in grades 1 through 12, excluding breaks for meals and recess, and a minimum of three instructional hours for students in kindergarten.

“Standard school year” means a school year of at least 180 teaching days or a total of at least 990 teaching hours per year.

“Standard unit of credit” or “standard credit” means credit awarded for a course in which the student successfully completes 140 clock hours of instruction and the requirements of the course. Local school boards may develop alternatives to the requirement for 140 clock hours of instruction as provided for in these regulations at 8 VAC 20-131-110.

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“Standards of Learning” (SOL) tests means those criterion referenced assessments approved by the Board of Education for use in the Virginia assessment program that measure attainment of knowledge and skills required by the Standards of Learning.

“Student” means a person of school age as defined by § 22.1-1 of the Code of Virginia, a child with disabilities as defined in § 22.1-213 of the Code of Virginia, and a person with limited English proficiency in accordance with § 22.1-5 of the Code of Virginia.

“Student periods” means the number of students a teacher instructs per class period multiplied by the number of class periods taught.

“Verified unit of credit” or “verified credit” means credit awarded for a course in which a student earns a standard unit of credit and achieves a passing score on a corresponding end-of-course SOL test or an additional test approved by the Board of Education as part of the Virginia assessment program.

“Virginia assessment program” means a system used to evaluate student achievement that includes Standards of Learning tests and additional tests which may be approved from time to time by the Board of Education.

Part I  
Purpose

8 VAC 20-131-10. Purpose.

The foremost purpose of public education in Virginia is to provide children with a quality education giving them opportunities to meet their fullest potential in life. The standards for the accreditation of public schools in Virginia are designed to ensure that an effective educational program is established and maintained in Virginia's public schools. The mission of the public education system is to educate students in the essential academic knowledge and skills in order that they may be equipped for citizenship, work, and a private life that is informed and free. The accreditation standards:

1. Provide an essential foundation of educational programs of high quality in all schools for all students.
2. Encourage continuous appraisal and improvement of the school program for the purpose of raising student achievement.
3. Foster public confidence.
4. Assure recognition of Virginia's public schools by other institutions of learning.
5. Establish a means of determining the effectiveness of schools.

Section 22.1-253.13:3 B of the Code of Virginia requires the Virginia Board of Education (hereinafter "board") promulgate regulations establishing standards for accreditation.

The statutory authority for these regulations is delineated in § 22.1-19 of the Code of Virginia, which includes the requirement that the board shall provide for the accreditation of public elementary, middle and secondary schools in accordance with regulations prescribed by it.

These regulations govern public schools operated by local school boards providing instruction to students as defined in 8 VAC 20-131-5. Other schools licensed under other state statutes are exempt from these requirements.

Part II  
Philosophy, Goals, and Objectives

8 VAC 20-131-20. Philosophy, goals, and objectives.

A. Each school shall have a current philosophy, goals, and objectives that shall serve as the basis for all policies and practices and shall be developed using the following criteria:

1. The philosophy, goals, and objectives shall be developed with the advice of professional and lay people who represent the various populations served by the school and in consideration of the needs of the community and shall serve as a basis for the creation and review of the biennial school plan.
2. The school's philosophy, goals and objectives shall be consistent with the Standards of Quality.
3. The goals and objectives shall (i) be written in plain language so as to be understandable to noneducators, including parents; (ii) to the extent possible, be stated in measurable terms; and (iii) consist primarily of measurable objectives to raise student and school achievement in the core academic areas of the Standards of Learning (SOL), to improve student and staff attendance, to reduce student drop-out rates, to increase graduation rates, and to increase the quality of instruction through professional staff development and licensure.
4. The school staff and community representatives shall review annually the extent to which the school has met its prior goals and objectives, analyze the school's student performance data including data by grade level or academic department as necessary, and report these outcomes to the division superintendent and the community in accordance with local school board policy. This report shall be in addition to the school report card required by 8 VAC 20-131-270 B.

B. Copies of the school's philosophy, goals and objectives shall be available upon request.

Part III  
Student Achievement

8 VAC 20-131-30. Student achievement expectations.

A. Each student should learn the relevant grade level/course subject matter before promotion to the next grade. The division superintendent shall certify to the Department of Education that the division's promotion/retention policy does not exclude students from membership in a grade, or participation in a course, in which SOL tests are to be administered. Each school shall have a process, as appropriate, to identify and recommend strategies to address the learning, behavior, communication, or development of individual children who are having difficulty in the educational setting.

B. In kindergarten through eighth grade, where the administration of Virginia assessment program tests are required by the Board of Education, each student shall be expected to take the tests; students who are accelerated ~~should shall~~ take the ~~test tests~~ of the grade-level enrolled or the tests for the grade level of the content received in instruction. ~~No student shall be required to take more than one test in any single content area in any tested grade each year.~~ Schools shall use the Virginia assessment program test results in kindergarten through eighth grade as part of a set of multiple criteria for determining the promotion or retention of students. Students promoted to high school from eighth grade should have attained basic mastery of the Standards of Learning in English, history and social science, mathematics, and science and should be prepared for high school work. Students shall not be required to retake the Virginia assessment program tests unless they are retained in grade and have not previously passed the related tests.

C. In kindergarten through grade 12, students may participate in a remediation recovery program as established by the board in English (Reading) or mathematics or both.

D. The board recommends that students in kindergarten through grade 8 not be required to attend summer school or weekend remediation classes solely based on failing a SOL test in science or history/social science.

E. Each student in middle and secondary schools shall take all applicable end-of-course SOL tests following course instruction. Students who achieve a passing score on an end-of-course SOL test shall be awarded a verified unit of credit in that course in accordance with the provisions of 8 VAC 20-131-110. Students may earn verified units of credit in any courses for which end-of-course SOL tests are available. Middle and secondary schools may consider the student's end-of-course SOL test score in determining the student's final course grade. However, no student who has failed an end-of-course SOL test but passed the related course shall be prevented from taking any other course in a content area and from taking the applicable end-of-course SOL test. The board may approve additional tests to verify student achievement in accordance with guidelines adopted for verified units of credit described in 8 VAC 20-131-110.

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F. Participation in the Virginia assessment program by students with disabilities shall be prescribed by provisions of their Individualized Education Program (IEP) or 504 Plan. All students with disabilities shall be assessed with appropriate accommodations and alternate assessments where necessary.

G. All students identified as limited English proficient (LEP) shall participate in the Virginia assessment program. A school based committee shall convene and make determinations regarding the participation level of LEP students in the Virginia assessment program. In kindergarten through eighth grade, limited English proficient students may be granted a one-time exemption from SOL testing in the areas of writing, science, and history and social science.

H. Students identified as foreign exchange students taking courses for credit shall be required to take the relevant Virginia assessment program tests. Foreign exchange students who are auditing courses and who will not receive a standard unit of credit for such courses shall not be required to take the Standards of Learning tests for those courses.

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8 VAC 20-131-40. Literacy Passport Tests. (Repealed.)

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8 VAC 20-131-50. Requirements for graduation.

A. The requirements for a student to earn a diploma and graduate from a Virginia high school shall be those in effect when that student enters the ninth grade for the first time. Students shall be awarded a diploma upon graduation from a Virginia high school.

When students below the ninth grade successfully complete courses offered for credit in grades 9 through 12, credit shall be counted toward meeting the standard units required for graduation provided the courses are equivalent in content and academic rigor as those courses offered at the secondary level. To earn a verified unit of credit for these courses, students must meet the requirements of 8 VAC 20-131-110.

The following requirements shall be the only requirements for a diploma, unless a local school board has prescribed additional requirements that have been approved by the Board of Education. All additional requirements prescribed by local school boards that have been approved by the Board of Education remain in effect until such time as the local school board submits a request to the Board to amend or discontinue such requirements.

B. Requirements for a Standard Diploma.

1. Beginning with the ninth-grade classes class of ~~2003-04~~ ~~[2009-2010~~ 2010-2011] and beyond, students shall earn the required standard and verified units of credit described in subdivision 2 of this subsection.

2. Credits required for graduation with a Standard Diploma.

Discipline Area	Standard Units of Credit Required	Verified Credits Required
English	4	2
Mathematics <sup>1</sup>	3	1
Laboratory Science <sup>2,6</sup>	3	1
History and Social Sciences <sup>3,6</sup>	3	1
Health and Physical Education	2	
<del>Foreign Language</del> , Fine Arts or Career and Technical Education <sup>7</sup>	<del>1</del> 2	
<del>Foreign Language, Economics [or and ] Personal Finance</del>	1	
Electives <sup>4</sup>	<del>6</del> 5 4	
Student Selected Test <sup>5</sup>		1
Total	22	6

<sup>1</sup> Courses completed to satisfy this requirement shall be at or above the level of algebra and shall include at least two different course selections from among: Algebra I, Geometry, Algebra, Functions, and Data Analysis, Algebra II, or other mathematics courses above the level of algebra and geometry-Algebra II. The board may shall approve additional courses to satisfy this requirement.

<sup>2</sup> Courses completed to satisfy this requirement shall include course selections from at least two different science disciplines: earth sciences, biology, chemistry, or physics [ or completion of the sequence of science courses required for the International Baccalaureate Diploma. ] The board may shall approve additional courses to satisfy this requirement.

<sup>3</sup> Courses completed to satisfy this requirement shall include U.S. and Virginia History, U.S. and Virginia Government, and one course in either world history or geography or both. The board may shall approve additional courses to satisfy this requirement.

<sup>4</sup> Courses to satisfy this requirement shall include at least two sequential electives as required by the Standards of Quality.

<sup>5</sup> A student may utilize additional tests for earning verified credit in computer science, technology, career and technical education, economics, or other areas as prescribed by the board in 8 VAC 20-131-110.

<sup>6</sup> Students who complete a career and technical education program sequence and pass an examination or occupational competency assessment in a career and technical education field that confers certification or an occupational competency credential from a recognized industry, or trade or professional association or acquires a professional license in a career and technical education field from the Commonwealth of Virginia may substitute the certification, competency credential, or license for (i) the student selected verified credit and (ii) either a science or history and social science verified credit when the certification, license, or credential confers more than one verified credit. The examination or occupational competency assessment must be approved by the Board of Education as an additional test to verify student achievement.

<sup>7</sup> Pursuant to Section 22.1-253.13:4, Code of Virginia, credits earned for this requirement shall include one credit in fine or performing arts or career and technical education.

Students completing the requirements for the Standard Diploma may be eligible to receive an honor deemed appropriate by the local school board as described in subsection ~~L~~ K of this section.

C. Requirements for a Standard Technical Diploma.

[1. Beginning with the ninth-grade class of 2010-2011 and beyond, students shall earn the required standard and verified units of credit described in subdivision 2 of this subsection.]

[2.] Credits required for graduation with a Standard Technical Diploma.

<u>Discipline Area</u>	<u>Standard Units of Credits Required</u>	<u>Verified Credits Required</u>
<u>English</u>	<u>4</u>	<u>2</u>
<u>Mathematics <sup>1</sup></u>	<u>3</u>	<u>1</u>
<u>Laboratory Science <sup>2,5</sup></u>	<u>3</u>	<u>1</u>
<u>History &amp; Social Sciences <sup>3,5</sup></u>	<u>3</u>	<u>1</u>
<u>Health and Physical Education</u>	<u>2</u>	
<u>Fine Arts, [ or ] Foreign Language, <del>[Economics or Personal Finance]</del></u>	<u>1</u>	
<u>[Economics and Personal Finance]</u>	<u>[1]</u>	
<u>Career and Technical Education <sup>4</sup></u>	<u>4</u>	
<u>Electives</u>	<u>[2-1]</u>	
<u>Student Selected <sup>6</sup></u>		<u>1</u>
<u>Total</u>	<u>22</u>	<u>6</u>

<sup>1</sup> Courses completed to satisfy this requirement shall include at least three [different] course selections from among: Algebra I, Geometry, Algebra Functions and Data Analysis, or Algebra II or other mathematics courses above the level of Algebra II. The board shall approve courses to satisfy this requirement.

<sup>2</sup> Courses completed to satisfy this requirement shall include course selections from at least three different science disciplines from among: earth sciences, biology, chemistry, or physics, or completion of the sequence of science courses required for the International Baccalaureate Diploma. The board shall approve courses to satisfy this requirement.

<sup>3</sup> Courses completed to satisfy this requirement shall include U.S. and Virginia History, U.S. and Virginia Government, and one course in either world history or geography or both. The board shall approve courses to satisfy this requirement.

<sup>4</sup> Courses completed to satisfy this requirement must include a career concentration as approved by the board. ~~[For concentrations that require less than four courses students must complete additional courses that are related to the student's career concentration. If a career concentration includes a specific assessment approved by the board and the student is eligible to take the assessment, then the student must take this assessment.]~~

<sup>5</sup> Students who complete a career and technical education program sequence and pass an examination or occupational competency assessment in a career and technical education field that confers certification or an occupational competency credential from a recognized industry or trade or professional association or acquires a professional license in a career and technical education field from the Commonwealth of Virginia may substitute the certification competency credential or license for (i) the student selected verified credit and (ii) either a science or history and social science verified credit when the certification license or credential confers more than one verified credit. The examination or occupational competency assessment must be approved by the board as an additional test to verify student achievement. ~~[ If a career concentration includes a specific assessment approved by the board and the student is eligible to take the assessment, then the student must take this assessment.]~~

<sup>6</sup> A student may utilize additional tests for earning verified credit in computer science, technology, career and technical education, economics or other areas as prescribed by the board in 8 VAC 20-131-110.

Students completing the requirements for the Standard Technical Diploma may be eligible to receive an honor deemed appropriate by the local school board as described in subsection K of this section.

C. D. Requirements for an Advanced Studies Diploma. [~~Contingent upon passage of the VDOE legislative proposal~~] Any student who meets the requirements for both the Advanced Studies and the Advanced Technical diploma may choose between these two diplomas.)

[1. Beginning with the ninth-grade class of 2010-2011 and beyond, students shall earn the required standard and verified units of credit described in subdivision 2 of this subsection.]

[2.] Credits required for graduation with an Advanced Studies Diploma.

Discipline Area	Standard Units of Credit Required	Verified Credits Required
English	4	2
Mathematics <sup>1</sup>	4	2
Laboratory Science <sup>2</sup>	4	2
History and Social Sciences <sup>3</sup>	4	2
Foreign Language <sup>4</sup>	3	
Health and Physical Education	2	
Fine Arts or Career and Technical Education	1	
<u>Economics [<del>or</del> and] Personal Finance</u>	<u>1</u>	
<u>Electives</u>	<u>2-3</u>	
Student Selected Test <sup>5</sup>		1
Total	<u>24 26</u>	9

<sup>1</sup> Courses completed to satisfy this requirement shall be at or above the level of algebra and shall include at least three different course selections from among: Algebra I, Geometry, Algebra II, or other mathematics courses above the level of Algebra II. The board may shall approve additional courses to satisfy this requirement.

<sup>2</sup> Courses completed to satisfy this requirement shall include course selections from at least three different science disciplines from among: earth sciences, biology, chemistry, or physics or completion of the sequence of science courses required for the International Baccalaureate Diploma. The board may shall approve additional courses to satisfy this requirement.

<sup>3</sup> Courses completed to satisfy this requirement shall include U.S. and Virginia History, U.S. and Virginia Government, and two courses in either world history or geography or both. The board may shall approve additional courses to satisfy this requirement.

<sup>4</sup> Courses completed to satisfy this requirement shall include three years of one language or two years of two languages.

<sup>5</sup> A student may utilize additional tests for earning verified credit in computer science, technology, career or technical education, economics, or other areas as prescribed by the board in 8 VAC 20-131-110.

Students completing the requirements for the Advanced Studies Diploma may be eligible to receive an honor deemed appropriate by the local school board as described in subsection F-K of this section.

E. Requirements for an Advanced Technical Diploma. [~~Contingent upon passage of the VDOE legislative proposal~~] Any student who meets the requirements for both the Advanced Studies and the Advanced Technical diploma may choose between these two diplomas.)

[1. Beginning with the ninth-grade class of 2010-2011 and beyond, students shall earn the required standard and verified units of credit described in subdivision 2 of this subsection.]

[2.] Credits required for graduation with an Advanced Technical Diploma.

Discipline Area	Standard Units of Credit Required	Verified Credits Required
English	4	2
Mathematics <sup>1</sup>	4	2
Laboratory Science <sup>2</sup>	4	2
History and Social Sciences <sup>3</sup>	4	2
Foreign Language <sup>4</sup>	3	
Health and Physical Education	2	
[Economics and Personal Finance]	[1]	
Fine Arts [ or Economics Career and Technical Education]	1	
Career and Technical Education <sup>5</sup>	[4-3]	
Student Selected Test <sup>5,6</sup>		1
<b>Total</b>	<b>26</b>	<b>9</b>

<sup>1</sup> Courses completed to satisfy this requirement shall include at least three different course selections from among: Algebra I, Geometry, Algebra II, or other mathematics courses above the level of Algebra II. The board shall approve courses to satisfy this requirement.

<sup>2</sup> Courses completed to satisfy this requirement shall include course selections from at least three different science disciplines from among: earth sciences, biology, chemistry, or physics or completion of the sequence of science courses required for the International Baccalaureate Diploma. The board shall approve courses to satisfy this requirement.

<sup>3</sup> Courses completed to satisfy this requirement shall include U.S. and Virginia History, U.S. and Virginia Government, and two courses in either world history or geography or both. The board shall approve courses to satisfy this requirement.

<sup>4</sup> Courses completed to satisfy this requirement shall include three years of one language or two years of two languages.

~~<sup>5</sup> Courses completed to satisfy this requirement must include a career concentration as approved by the board. For concentrations that require less than four courses, students must complete additional courses that are related to the student's career concentration. If a career concentration includes a specific assessment approved by the board, then the student must take this assessment to fulfill this requirement.~~

<sup>5</sup> Courses completed to satisfy this requirement must include a career concentration as approved by the board. If a career concentration includes a specific assessment approved by the board and the student is eligible to take the assessment, then the student must take this assessment.

<sup>5, 6</sup> A student may utilize additional tests for earning verified credit in computer science, technology, career or technical education, economics, or other areas as prescribed by the board in 8 VAC 20-131-110.

Students completing the requirements for the Advanced Technical Diploma may be eligible to receive an honor deemed appropriate by the local school board as described in subsection K of this section.

~~D- F.~~ Requirements for the Modified Standard Diploma.

1. Every student shall be expected to pursue a Standard Diploma ~~or~~, Standard Technical Diploma, Advanced Studies Diploma, or Advanced Technical Diploma, or. The Modified Standard Diploma program is intended for certain students at the secondary level who have a disability and are unlikely to meet the credit requirements for a Standard Diploma. Eligibility and participation in the Modified Standard Diploma program shall be determined by the student's Individualized Education

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Program (IEP) team including the student, where appropriate, at any point after the student's eighth grade year.

2. The school must secure the informed written consent of the parent/guardian and the student to choose this diploma program after review of the student's academic history and the full disclosure of the student's options.

3. The student who has chosen to pursue a Modified Standard Diploma shall also be allowed to pursue the Standard Diploma, ~~or Standard Technical Diploma~~, Advanced Studies Diploma ~~or Advanced Technical Diploma~~ at any time throughout that student's high school career, and the student must not be excluded from courses and tests required to earn a Standard or Advanced Studies Diploma.

4. Students pursuing the Modified Standard Diploma shall pass literacy and numeracy competency assessments prescribed by the board.

5. Credits required for graduation with a Modified Standard Diploma.

Discipline Area	Standard Units of Credit Required
English	4
Mathematics <sup>1</sup>	3
Science <sup>2</sup>	2
History and Social Sciences <sup>3</sup>	2
Health and Physical Education	2
Fine Arts or Career and Technical Education	1
Electives <sup>4</sup>	6
Total	20

<sup>1</sup> Courses completed to satisfy this requirement shall include content from among applications of algebra, geometry, personal finance, and ~~probability and~~ statistics in courses that have been approved by the board.

<sup>2</sup> Courses completed shall include content from at least two of the following: applications of earth science, biology, chemistry, or physics in courses approved by the board.

<sup>3</sup> Courses completed to satisfy this requirement shall include one unit of credit in U.S. and Virginia History and one unit of credit in U.S. and Virginia Government in courses approved by the board.

<sup>4</sup> Courses to satisfy this requirement shall include at least two sequential electives in the same manner required for the Standard Diploma.

6. The student must meet any additional criteria established by the Board of Education.

**E.G.** In accordance with the requirements of the Standards of Quality, students with disabilities who complete the requirements of their Individualized Education Program (IEP) and do not meet the requirements for other diplomas shall be awarded Special Diplomas.

**F.H.** In accordance with the requirements of the Standards of Quality, students who complete prescribed programs of studies defined by the local school board but do not qualify for Standard, ~~Standard Technical~~, Advanced Studies, ~~Advanced Technical~~, Modified Standard, Special, or General Achievement diplomas shall be awarded

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Certificates of Program Completion. The requirements for Certificates of Program Completion are developed by local school boards in accordance with the Standards of Quality. Students receiving a general achievement diploma shall comply with 8 VAC 20-680, *Regulations Governing the General Achievement Diploma*.

**G. I.** In accordance with the provisions of the compulsory attendance law and 8 VAC 20-360, *Regulations Governing General Education Development Certificates*, students who do not qualify for diplomas may earn a high school equivalency credential.

**H. J.** At a student's request, the local school board shall communicate or otherwise make known to institutions of higher education, potential employers, or other applicable third parties, in a manner that the local school board deems appropriate, that a student has attained the state's academic expectations by earning a Virginia diploma and that the value of such a diploma is not affected in any way by the accreditation status of the student's school.

**I. K.** Awards for exemplary student performance. Students who demonstrate academic excellence and/or outstanding achievement may be eligible for one or more of the following awards:

1. Students who complete the requirements for an Advanced Studies Diploma or Advanced Technical Diploma with an average grade of "B" or better, and successfully complete college-level coursework that will earn the student at least nine transferable college credits in Advanced Placement (AP), International Baccalaureate (IB), Cambridge, or dual enrollment courses shall receive the Governor's Seal on the diploma.
2. Students who complete the requirements for a Standard Diploma ~~or~~ Standard Technical Diploma, Advanced Studies Diploma or Advanced Technical Diploma with an average grade of "A" shall receive a Board of Education Seal on the diploma.
3. The Board of Education's Career and Technical Education Seal will be awarded to students who earn a Standard ~~or~~ Diploma, Standard Technical Diploma, Advanced Studies Diploma or Advanced Technical Diploma and complete a prescribed sequence of courses in a career and technical education concentration or specialization that they choose and maintain a "B" or better average in those courses; or (i) pass an examination or an occupational competency assessment in a career and technical education concentration or specialization that confers certification or occupational competency credential from a recognized industry, trade or professional association or (ii) acquire a professional license in that career and technical education field from the Commonwealth of Virginia. The Board of Education shall approve all professional licenses and examinations used to satisfy these requirements.
4. The Board of Education's Seal of Advanced Mathematics and Technology will be awarded to students who earn either a Standard ~~or~~ Diploma, Standard Technical

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**Diploma [ , ]** Advanced Studies Diploma **or Advanced Technical Diploma** and (i) satisfy all of the mathematics requirements for the Advanced Studies Diploma **or Advanced Technical Diploma** (four units of credit including Algebra II; two verified units of credit) with a "B" average or better; and (ii) either (a) pass an examination in a career and technical education field that confers certification from a recognized industry, or trade or professional association; (b) acquire a professional license in a career and technical education field from the Commonwealth of Virginia; or (c) pass an examination approved by the board that confers college-level credit in a technology or computer science area. The Board of Education shall approve all professional licenses and examinations used to satisfy these requirements.

5. The Board of Education's Seal for Excellence in Civics Education will be awarded to students who earn either a Standard **or Diploma, Standard Technical Diploma, Advanced Studies Diploma [ , ] or Advanced Technical Diploma** and: (i) complete Virginia and United States History and Virginia and United States Government courses with a grade of "B" or higher; and, (ii) have good attendance and no disciplinary infractions as determined by local school board policies and, (iii) complete 50 hours of voluntary participation in community service or extracurricular activities. Activities that would satisfy the requirements of clause (iii) of this subdivision include: (a) volunteering for a charitable or religious organization that provides services to the poor, sick or less fortunate; (b) participating in Boy Scouts, Girl Scouts, or similar youth organizations; (c) participating in JROTC; (d) participating in political campaigns or government internships, or Boys State, Girls State, or Model General Assembly; or (e) participating in school-sponsored extracurricular activities that have a civics focus. Any student who enlists in the United States military prior to graduation will be deemed to have met this community service requirement.

6. Students may receive other seals or awards for exceptional academic, career and technical, citizenship, or other exemplary performance in accordance with criteria defined by the local school board.

**J. L.** Students completing graduation requirements in a summer school program shall be eligible for a diploma. The last school attended by the student during the regular session shall award the diploma unless otherwise agreed upon by the principals of the two schools.

**K. M.** Students who complete Advanced Placement courses, college-level courses, or courses required for an International Baccalaureate Diploma shall be deemed to have completed the requirements for graduation under these standards provided they have earned the standard units of credit and earned verified units of credit in accordance with the requirements of subsections B and C of this section.

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L.N. Students shall be counseled annually regarding the opportunities for using additional tests for earning verified credits as provided in accordance with the provisions of 8 VAC 20-131-110, and the consequences of failing to fulfill the obligations to complete the requirements for verified units of credit.

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8 VAC 20-131-60. Transfer students.

A. The provisions of this section pertain generally to students who transfer into Virginia high schools. Students transferring in grades K-8 from Virginia public schools or nonpublic schools accredited by one of the approved accrediting constituent members of the Virginia Council for Private Education shall be given recognition for all grade-level work completed. The academic record of students transferring from all other schools shall be evaluated to determine appropriate grade placement in accordance with policies adopted by the local school board. The State Testing Identifier (STI) for students who transfer into a Virginia public school from another Virginia public school shall be retained by the receiving school.

B. For the purposes of this section, the term "beginning" means within the first 20 hours of instruction per course. The term "during" means after the first 20 hours of instruction per course.

C. Standard or verified units of credit earned by a student in a Virginia public school shall be transferable without limitation regardless of the accreditation status of the Virginia public school in which the credits were earned. Virginia public schools shall accept standard and verified units of credit from other Virginia public schools [ Virginia's virtual learning program, Virtual Virginia,] and state operated programs. Standard units of credit also shall be accepted for courses satisfactorily completed in accredited colleges and universities when prior written approval of the principal has been granted or the student has been given credit by the previous school attended.

D. A secondary school shall accept credits toward graduation received from Virginia nonpublic schools accredited by one of the approved accrediting constituent members of the Virginia Council for Private Education (VCPE). The Board of Education will maintain contact with the VCPE and may periodically review its accrediting procedures and policies as part of its policies under this section.

Nothing in these standards shall prohibit a public school from accepting standard units of credit toward graduation awarded to students who transfer from all other schools when the courses for which the student receives credit generally match the description of or can be substituted for courses for which the receiving school gives standard credit, and the school from which the child transfers certifies that the courses for which credit is given meet the requirements of 8 VAC 20-131-110 A.

Students transferring into a Virginia public school shall be required to meet the requirements prescribed in 8 VAC 20-131-50 to receive a Standard, Standard Technical, Advanced Studies, Advanced Technical or Modified Standard Diploma, except as provided by subsection G of this section. To receive a Special Diploma or Certificate of Program Completion, a student must meet the requirements prescribed by the Standards of Quality.

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E. The academic record of a student transferring from other Virginia public schools shall be sent directly to the school receiving the student upon request of the receiving school in accordance with the provisions of the 8 VAC 20-150-10, Management of the Student's Scholastic Records in the Public Schools of Virginia. [The State Testing Identifier (STI) for students who transfer into a Virginia public school from another Virginia public school shall be retained by the receiving school.]

F. The academic record of a student transferring into Virginia public schools from other than a Virginia public school shall be evaluated to determine the number of standard units of credit that have been earned, including credit from schools outside the United States, and the number of verified units of credit needed to graduate in accordance with subsection G of this section. Standard units of credit also shall be accepted for courses satisfactorily completed in accredited colleges and universities when the student has been given credit by the previous school attended.

Students transferring above the tenth grade from schools or other education programs that do not require or give credit for health and physical education shall not be required to take these courses to meet graduation requirements.

G. Students entering a Virginia public high school for the first time after the tenth grade shall earn as many credits as possible toward the graduation requirements prescribed in 8 VAC 20-131-50. However, schools may substitute courses required in other states in the same content area if the student is unable to meet the specific content requirements of 8 VAC 20-131-50 without taking a heavier than normal course load in any semester, by taking summer school, or by taking courses after the time when he otherwise would have graduated. In any event, no such student shall earn fewer than the following number of verified units, nor shall such students be required to take SOL tests or additional tests as defined in 8 VAC 20-131-110 for verified units of credit in courses previously completed at another school or program of study, unless necessary to meet the requirements listed in subdivisions 1 and 2 of this subsection:

1. For a Standard Diploma or Standard Technical Diploma:

- a. Students entering a Virginia high school for the first time during the ninth grade or at the beginning of the tenth grade shall earn credit as prescribed in 8 VAC 20-131-50;
- b. Students entering a Virginia high school for the first time during the tenth grade or at the beginning of the eleventh grade shall earn a minimum of four verified units of credit: one each in English, mathematics, history, and science. Students who complete a career and technical education program sequence may substitute a certificate, occupational competency credential or license for either a science or history and social science verified credit pursuant to 8 VAC 20-131-50; and

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c. Students entering a Virginia high school for the first time during the eleventh grade or at the beginning of the twelfth grade shall earn a minimum of two verified units of credit: one in English and one of the student's own choosing.

2. For an Advanced Studies Diploma or Advanced Technical Diploma:

a. Students entering a Virginia high school for the first time during the ninth grade or at the beginning of the tenth grade shall earn credit as prescribed in 8 VAC 20-131-50;

b. Students entering a Virginia high school for the first time during the tenth grade or at the beginning of the eleventh grade shall earn a minimum of six verified units of credit: two in English and one each in mathematics, history, and science and one of the student's own choosing; and

c. Students entering a Virginia high school for the first time during the eleventh grade or at the beginning of the twelfth grade shall earn a minimum of four verified units of credit: one in English and three of the student's own choosing.

H. Students entering a Virginia high school for the first time after the first semester of their eleventh grade year must meet the requirements of subdivision G 1 c or G 2 c of this section. Students transferring after 20 instructional hours per course of their senior or twelfth grade year shall be given every opportunity to earn a Standard, Advanced Studies, or Modified Standard Diploma. If it is not possible for the student to meet the requirements for a diploma, arrangements should be made for the student's previous school to award the diploma. If these arrangements cannot be made, a waiver of the verified unit of credit requirements may be available to the student. The Department of Education may grant such waivers upon request by the local school board in accordance with guidelines prescribed by the Board of Education.

I. Any local school division receiving approval to increase its course credit requirements for a diploma may not deny either the Standard, Advanced Studies, or Modified Standard Diploma to any transfer student who has otherwise met the requirements contained in these standards if the transfer student can only meet the division's additional requirements by taking a heavier than normal course load in any semester, by taking summer school, or by taking courses after the time when he otherwise would have graduated.

J. The transcript of a student who graduates or transfers from a Virginia secondary school shall conform to the requirements of 8 VAC 20-160-10, *Regulations Governing Secondary School Transcripts*.

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K. The accreditation status of a high school shall not be included on the student transcript provided to colleges, universities, or employers. The board expressly states that any student who has met the graduation requirements established in 8 VAC 20-131-50 and has received a Virginia diploma holds a diploma that should be recognized as equal to any other Virginia diploma of the same type, regardless of the accreditation status of the student's high school. It is the express policy of the board that no student shall be affected by the accreditation status of the student's school. The board shall take appropriate action, from time to time, to ensure that no student is affected by the accreditation status of the student's school.

Part IV  
School Instructional Program

8 VAC 20-131-70. Program of instruction and learning objectives.

A. Each school shall provide a program of instruction that promotes individual student academic achievement in the essential academic disciplines and shall provide additional instructional opportunities that meet the abilities, interests, and educational needs of students. Each school shall establish learning objectives to be achieved by students at successive grade levels that meet or exceed the knowledge and skills contained in the Standards of Learning for English, mathematics, science, and history/social science adopted by the board and shall continually assess the progress of each student in relation to the objectives.

B. Instruction shall be designed to accommodate all students, including those identified with disabilities in accordance with the Individuals with Disabilities Education Act or § 504 of the Rehabilitation Act, as amended, those identified as gifted/talented, and those who have limited English proficiency. Each school shall provide students identified as gifted/talented with instructional programs taught by teachers with special training or experience in working with gifted/talented students. Students with disabilities shall have the opportunity to receive a full continuum of education services, in accordance with 8 VAC 20-80, *Regulations Governing Special Education Programs for Children with Disabilities in Virginia* and other pertinent federal and state regulations.

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8 VAC 20-131-80. Instructional program in elementary schools.

A. The elementary school shall provide each student a program of instruction that corresponds to the Standards of Learning for English, mathematics, science, and history/social science. In addition, each school shall provide instruction in art, music, and physical education and health and shall require students to participate in a program of physical fitness during the regular school year in accordance with guidelines established by the Board of Education.

B. In kindergarten through grade 3, reading, writing, spelling, and mathematics shall be the focus of the instructional program. Schools shall maintain ~~in a manner prescribed by the Board of Education,~~ an early skills and knowledge achievement record in reading and mathematics for each student in grades kindergarten through grade 3 to monitor student progress and to promote successful achievement on the third grade SOL tests. This record shall be included with the student's records if the student transfers to a new school.

C. To provide students with sufficient opportunity to learn, a minimum of 75% of the annual instructional time of 990 hours shall be given to instruction in the disciplines of English, mathematics, science, and history/social science. Students who are not successfully progressing in early reading proficiency or who are unable to read with comprehension the materials used for instruction shall receive additional instructional time in reading, which may include summer school.

D. Elementary schools are encouraged to provide instruction in foreign languages.

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8 VAC 20-131-90. Instructional program in middle schools.

A. The middle school shall provide each student a program of instruction which corresponds to the Standards of Learning for English, mathematics, science, and history/social science. In addition, each school shall provide instruction in art, music, foreign language, physical education and health, and career and technical exploration and shall require students to participate in a program of physical fitness during the regular school year in accordance with guidelines established by the Board of Education.

B. The middle school shall provide a minimum of eight courses to students in the eighth grade. English, mathematics, science, and history/social science shall be required. Four elective courses shall be available: level one of a foreign language, one in health and physical education, one in fine arts, and one in career and technical exploration.

C. Level one of a foreign language and an Algebra I course shall be available to all eighth grade students. For any high school credit-bearing course taken in middle school, parents may request that grades be omitted from the student's transcript and the student not earn high school credit for the course in accordance with policies adopted by the local school board. Notice of this provision must be provided to parents with a deadline and format for making such a request. Nothing in these regulations shall be construed to prevent a middle school from offering any other credit-bearing courses for graduation.

D. To provide students a sufficient opportunity to learn, each student shall be provided 140 clock hours per year of instruction in each of the four disciplines of English, mathematics, science, and history/social science. Sixth grade students may receive an alternative schedule of instruction provided each student receives at least 560 total clock hours of instruction in the four academic disciplines.

E. Each school shall ensure that students who are unable to read with comprehension the materials used for instruction receive additional instruction in reading, which may include summer school.

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8 VAC 20-131-100. Instructional program in secondary schools.

A. The secondary school shall provide each student a program of instruction in the academic areas of English, mathematics, science, and history/social science that enables each student to meet the graduation requirements described in 8 VAC 20-131-50 and shall offer opportunities for students to pursue a program of studies in foreign languages, fine arts, and career and technical areas including:

1. Career and technical education choices that prepare the student as a career and technical education program completer in one of three or more occupational areas and that prepare the student for technical or preprofessional postsecondary programs;
2. Coursework and experiences that prepare the student for college-level studies including access to at least three Advanced Placement (AP) courses, college-level courses for degree credit, International Baccalaureate (IB) courses, Cambridge courses, or any combination thereof;
3. Preparation for college admissions tests; and
4. Opportunities to study and explore the fine arts and foreign languages.

B. Minimum course offerings for each secondary school shall provide opportunities for students to meet the graduation requirements stated in 8 VAC 20-131-50 and must include:

English	4
Mathematics	4
Science (Laboratory)	4
History and Social Sciences	4
Foreign Language	3
Electives	[4-3]
Career and Technical Education	11
[Economics and Personal Finance]	[1]
Fine Arts	2
Health and Physical Education	2
Total Units	38

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C. Classroom driver education may count for 36 class periods of health education. Students shall not be removed from classes other than health and physical education for the in-car phase of driver education.

D. Each school shall ensure that students who are unable to read with comprehension the materials used for instruction receive additional instruction in reading, which may include summer school.

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8 VAC 20-131-110. Standard and verified units of credit.

A. The standard unit of credit for graduation shall be based on a minimum of 140 clock hours of instruction and successful completion of the requirements of the course. When credit is awarded in less than whole units, the increment awarded must be no greater than the fractional part of the 140 hours of instruction provided. If a school division elects to award credit on a basis other than the 140 clock hours of instruction required for a standard unit of credit defined in this subsection, the local school division shall develop a written policy approved by the superintendent and school board which ensures:

1. That the content of the course for which credit is awarded is comparable to 140 clock hours of instruction; and
2. That upon completion, the student will have met the aims and objectives of the course.

B. A verified unit of credit for graduation shall be based on a minimum of 140 clock hours of instruction, successful completion of the requirements of the course, and the achievement by the student of a passing score on the end-of-course SOL test for that course or additional tests as described in this subsection. A student may also earn a verified unit of credit by the following methods:

1. In accordance with the provisions of the Standards of Quality, students may earn a standard and verified unit of credit for any elective course in which the core academic SOL course content has been integrated and the student passes the related end-of-course SOL test. Such course and test combinations must be approved by the Board of Education.
2. Upon the recommendation of the division superintendent and demonstration of mastery of course content and objectives, qualified students may receive a standard unit of credit and be permitted to sit for the relevant SOL test to earn a verified credit without having to meet the 140-clock-hour requirement.
3. Beginning with the ninth grade class of 2003-2004 and beyond students who do not pass Standards of Learning tests in science or history and social science may receive locally awarded verified credits from the local school board in accordance with criteria established in guidelines adopted by the Board of Education.

C. The Board of Education may from time to time approve additional tests for the purpose of awarding verified credit. Such additional tests, which enable students to earn verified units of credit, must, at a minimum, meet the following criteria:

1. The test must be standardized and graded independently of the school or school division in which the test is given;

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2. The test must be knowledge based;
3. The test must be administered on a multistate or international basis, or administered as part of another state's accountability assessment program; and
4. To be counted in a specific academic area, the test must measure content that incorporates or exceeds the SOL content in the course for which verified credit is given.

The Board of Education will set the score that must be achieved to earn a verified unit of credit on the additional test options.

D. With such funds as are appropriated by the General Assembly, the Board of Education will provide opportunities for students who meet criteria adopted by the board to have an expedited retake of a SOL test to earn verified credit or to meet literacy and numeracy requirements for the Modified Standard Diploma.

8 VAC 20-131-120. Summer school.

A. The courses offered and the quality of instruction in the summer school program shall be comparable to that offered during the regular school term. At the middle and secondary school levels, credit for courses taken for credit toward graduation other than a repeat course shall be awarded in accordance with the requirements of 8 VAC 20-131-110. Students must also meet the requirements for SOL testing if appropriate.

B. At the middle and secondary school levels, credit for repeat courses ordinarily will be granted on the same basis as that for new courses; however, with prior approval of the principal, students may be allowed to enroll in repeat courses to be completed in no less than 70 clock hours of instruction per unit of credit. Students must also meet the requirements for SOL testing if appropriate.

C. Summer school instruction at any level, which is provided as part of a state-funded remedial program, shall be designed to improve specific identified student deficiencies. Such programs shall be conducted in accordance with regulations adopted by the board.

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8 VAC 20-131-130. Elective courses.

Locally developed elective courses offered for credit toward high school graduation shall be approved by the division superintendent and local school board.

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8 VAC 20-131-140. College and career preparation programs and opportunities for postsecondary credit.

Each middle and secondary school shall provide for the early identification and enrollment of students in a college preparation program with a range of educational and academic experiences in and outside the classroom, including an emphasis on experiences that will motivate disadvantaged and minority students to attend college.

Beginning in the middle school years, students shall be counseled on opportunities for beginning postsecondary education and opportunities for obtaining industry certifications, occupational competency credentials, or professional licenses in a career and technical education field prior to high school graduation. Such opportunities shall include access to at least three Advanced Placement courses or three college-level courses for degree credit pursuant to 8 VAC 20-131-100. Students taking advantage of such opportunities shall not be denied participation in school activities for which they are otherwise eligible. Wherever possible, students shall be encouraged and afforded opportunities to take college courses simultaneously for high school graduation and college degree credit (dual enrollment), under the following conditions:

1. Written approval of the high school principal prior to participation in dual enrollment must be obtained;
2. The college must accept the student for admission to the course or courses; and
3. The course or courses must be given by the college for degree credits (no remedial courses will be accepted).

Schools that comply with this standard shall not be penalized in receiving state appropriations.

Beginning with the [ 2009-2010 2010-2011 ] academic year, all [ middle ] schools shall [ develop and maintain begin development of ] a personal Academic and Career Plan for each [ seventh- and eighth- grade seventh-grade student with completion by the fall of the student's eighth-grade year. that includes specific components established by the Board of Education. Beginning with the 2010 2011 academic year, students Students who transfer from other than a Virginia public school into the eighth-grade shall have the Plan developed as soon as practicable following enrollment. Beginning with the 2011-2012 academic year, students] who transfer into a Virginia public school after their eighth-grade year shall have an Academic and Career Plan developed upon enrollment. The components of the Plan shall include, but not be limited to, the student's [educational goals and ] program of study for high school graduation and a postsecondary career pathway based on the student's academic and career interests. The Academic and Career Plan shall be developed [in accordance with guidelines established by the Board of Education] and signed by the student, student's parent or guardian, and school official(s)

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designated by the principal. The Plan shall be included in the student's record and shall be reviewed and updated, if necessary, before the student enters the ninth and eleventh grades. The school shall have met its obligation for parental involvement if it makes a good faith effort to notify the parent or guardian of the responsibility for the development and approval of the Plan. [Any personal academic and career plans prescribed by local school boards for students in grades 7-12 and in effect as of June 30, 2009, are approved to continue without further action by the Board.]

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8 VAC 20-131-150. Standard school year and school day.

A. The standard school year shall be 180 instructional days. The standard school day for students in grades 1 through 12 shall average at least 5-1/2 instructional hours, excluding breaks for meals and recess, and a minimum of three hours for kindergarten.

B. All students in grades 1 through 12 shall maintain a full day schedule of classes (5-1/2 hours), unless a waiver is granted in accordance with policies defined by the local school board.

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8 VAC 20-131-160. (Repealed.)

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8 VAC 20-131-170. Family Life Education.

Each school may implement the Standards of Learning for the Family Life Education program promulgated by the Board of Education or a Family Life Education program consistent with the guidelines developed by the board, which shall have the goals of reducing the incidence of pregnancy and sexually-transmitted diseases and substance abuse among teenagers.

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8 VAC 20-131-180. Off-site instruction.

A. Homebound instruction shall be made available to students who are confined at home or in a health care facility for periods that would prevent normal school attendance based upon certification of need by a licensed physician or licensed clinical psychologist. For students eligible for special education or related services, the Individualized Education Program committee must revise the IEP, as appropriate. Credit for the work shall be awarded when it is done under the supervision of a licensed teacher, a person eligible to hold a Virginia license, or other appropriately licensed professional employed by the local school board, and there is evidence that the instructional time requirements or alternative means of awarding credit adopted by the local school board in accordance with the provisions of 8 VAC 20-131-110 have been met.

B. Students may enroll in and receive a standard and verified unit of credit for supervised correspondence courses with prior approval of the principal. Standard units of credit shall be awarded for the successful completion of such courses when the course is equivalent to that offered in the regular school program and the work is done under the supervision of a licensed teacher, or a person eligible to hold a Virginia license, approved by the local school board. Verified units of credit may be earned when the student has passed the SOL test associated with the correspondence course completed. The local school board shall develop policies governing this method of instruction in accordance with the provisions of 8 VAC 20-131-110 and the administration of required SOL tests prescribed by 8 VAC 20-131-30.

C. Schools are encouraged to pursue alternative means to deliver instruction to accommodate student needs through emerging technologies and other similar means. Standard units of credit shall be awarded for successful completion of such courses when the course is equivalent to that offered in the regular school program and the work is done under the supervision of a licensed teacher, or a person eligible to hold a Virginia teaching license and approved by the local school board. Verified units of credit may be earned when the student has successfully completed the requirements and passed the SOL test associated with the course. The local school board shall develop policies governing this method of delivery of instruction that shall include the provisions of 8 VAC 20-131-110 and the administration of required SOL tests prescribed by 8 VAC 20-131-30.

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8 VAC 20-131-190. Library media, materials and equipment.

A. Each school shall maintain an organized library media center as the resource center of the school and provide a unified program of media services and activities for students and teachers before, during, and after school. The library media center shall contain hard copy, electronic technological resources, materials, and equipment that are sufficient to meet research, inquiry, and reading requirements of the instructional program and general student interest.

B. Each school shall provide a variety of materials and equipment to support the instructional program.

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8 VAC 20-131-200. Extracurricular and other school activities, recess.

A. School sponsored extracurricular activities shall be under the direct supervision of the staff and shall contribute to the educational objectives of the school. Extracurricular activities must be organized to avoid interrupting the instructional program. Extracurricular activities shall not be permitted to interfere with the student's required instructional activities. Extracurricular activities and eligibility requirements shall be established and approved by the superintendent and the school board.

B. Competitive sports of a varsity nature (scheduled league games) shall be prohibited as a part of the elementary school program.

C. Each elementary school shall provide students with a daily recess during the regular school year as determined appropriate by the school.

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## Part V

## School and Instructional Leadership

## 8 VAC 20-131-210. Role of the principal.

A. The principal is recognized as the instructional leader of the school and is responsible for effective school management that promotes positive student achievement, a safe and secure environment in which to teach and learn, and efficient use of resources. As a matter of policy, the board, through these standards, recognizes the critically important role of principals to the success of public schools and the students who attend those schools and recommends that local school boards provide principals with the maximum authority available under law in all matters affecting the school including, but not limited to, instruction and personnel, in a manner that allows the principal to be held accountable in a fair and consistent manner for matters under his direct control.

B. As the instructional leader, the principal is responsible for ensuring that students are provided an opportunity to learn and shall:

1. Protect the academic instructional time from unnecessary interruptions and disruptions and enable the professional teaching staff to spend the maximum time possible in the teaching/learning process by keeping to a minimum clerical responsibility and the time students are out of class;
2. Ensure that the school division's student code of conduct is enforced and seek to maintain a safe and secure school environment;
3. Analyze the school's test scores annually, by grade and by discipline, to:
  - a. Direct and require appropriate prevention, intervention, and/or remediation to those students performing below grade level or not passing the SOL tests;
  - b. Involve the staff of the school in identifying the types of staff development needed to improve student achievement and ensure that the staff participate in those activities; and
  - c. Analyze classroom practices and methods for improvement of instruction;
4. Ensure that students' records are maintained and that criteria used in making placement and promotion decisions, as well as any instructional interventions used to improve the student's performance, are included in the record;
5. Monitor and evaluate the quality of instruction, provide staff development, provide support that is designed to improve instruction, and seek to ensure the successful attainment of the knowledge and skills required for students by the SOL tests;

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6. Maintain records of students who drop out of school, including their reasons for dropping out and actions taken to prevent these students from dropping out; and
7. Notify the parents of rising eleventh-grade and twelfth-grade students of:
  - a. the number of standard and verified units of credit required for graduation; and
  - b. the remaining number of such units of credit the individual student requires for graduation.

8. Notify the [parents parent or guardian] of students removed from class for disciplinary reasons for two or more consecutive days in whole or in part.

C. As the school manager, the principal shall:

1. Work with staff to create an atmosphere of mutual respect and courtesy and to facilitate constructive communication by establishing and maintaining a current handbook of personnel policies and procedures;
2. Work with the community to involve parents and citizens in the educational program and facilitate communication with parents by maintaining and disseminating a current student handbook of policies and procedures that includes the school division's standards of student conduct and procedures for enforcement, along with other matters of interest to parents and students;
3. Maintain a current record of licensure, endorsement, and in-service training completed by staff; and
4. Maintain records of receipts and disbursements of all funds handled. These records shall be audited annually by a professional accountant approved by the local school board.

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8 VAC 20-131-220. Role of professional teaching staff.

The professional teaching staff shall be responsible for providing instruction that is educationally sound in an atmosphere of mutual respect and courtesy, which is conducive to learning, and in which all students are expected to achieve the objectives of the Standards of Learning for the appropriate grade level or course. The staff shall:

1. Serve as role models for effective oral and written communication with special attention to the correct use of language and spelling;
2. Strive to strengthen the basic skills of students in all subjects;
3. Establish teaching objectives to achieve the following:
  - a. Identify what students are expected to learn; and
  - b. Inform students of the achievement expected and keep them engaged in learning tasks;
4. Provide for individual differences of students through the use of differentiated instruction, varied materials, and activities suitable to their interests and abilities; and
5. Assess the progress of students and report promptly and constructively to them and their parents.

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8 VAC 20-131-230. Role of support staff.

The school's support staff shall work with the principal and professional teaching staff to promote student achievement and successful attainment of the school's goals.

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8 VAC 20-131-240. Administrative and support staff; staffing requirements.

A. Each school shall have at a minimum the staff as specified in the Standards of Quality with proper licenses and endorsements for the positions they hold.

B. The principal of each middle and secondary school shall be employed on a 12-month basis.

C. Each secondary school with 350 or more students and each middle school with 400 or more students shall employ at least one member of the guidance staff for 11 months. Guidance counseling shall be provided for students to ensure that a program of studies contributing to the student's academic achievement and meeting the graduation requirements specified in 8 VAC 20-131-50 is being followed.

D. The counseling program for elementary, middle, and secondary schools shall provide a minimum of 60% of the time for each member of the guidance staff devoted to counseling of students.

E. The middle school classroom teacher's standard load shall be based on teaching no more than 5/6 of the instructional day with no more than 150 student periods per day or 30 class periods per week. Beginning with the academic year 2008-2009 a middle school classroom teacher's standard load shall be based on teaching no more than 5/6 of the instructional day with no more than 150 student periods per day or 25 class periods per week.

F. The secondary classroom teacher's standard load shall be based on teaching no more than 5/6 of the instructional day with no more than 150 student periods per day or 25 class periods per week. Teachers of block programs that encompass more than one class period with no more than 120 student periods per day may teach 30 class periods per week. Teachers who teach very small classes may teach 30 class periods per week, provided the teaching load does not exceed 75 student periods per day. If a classroom teacher teaches 30 class periods per week with more than 75 student periods per day, an appropriate contractual arrangement and compensation shall be provided.

G. Middle or secondary school teachers shall teach no more than 750 student periods per week; however, physical education and music teachers may teach 1,000 student periods per week.

H. Notwithstanding the provisions of subsections E, F, and G each full-time middle and secondary classroom teacher shall be provided one planning period per day or the equivalent, unencumbered of any teaching or supervisory duties.

I. Staff-student ratios in special and career and technical education classrooms shall comply with regulations of the Board of Education.

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J. Student services personnel as defined in the Standards of Quality shall be available as necessary to promote academic achievement and to provide support services to the school.

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8 VAC 20-131-250. (Repealed.)

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## Part VI

## School Facilities and Safety

8 VAC 20-131-260. School facilities and safety.

A. Each school shall be maintained in a manner ensuring compliance with the Virginia Statewide Building Code (13 VAC 5-63) In addition, the school administration shall:

1. Maintain a physical plant that is accessible, barrier free, safe, and clean;
2. Provide for the proper outdoor display of flags of the United States and of the Commonwealth of Virginia;
3. Provide suitable space for classrooms, administrative staff, pupil personnel services, library and media services, and for the needs and safety of physical education;
4. Provide adequate, safe, and properly-equipped laboratories to meet the needs of instruction in the sciences, technology, fine arts, and career and technical programs; and
5. Provide facilities for the adequate and safe administration and storage of student medications.

B. Each school shall maintain records of regular safety, health, and fire inspections that have been conducted and certified by local health and fire departments. The frequency of such inspections shall be determined by the local school board in consultation with the local health and fire departments. In addition, the school administration shall:

1. Equip all exit doors with panic hardware as required by the Virginia Statewide Building Code (13 VAC 5-63); and
2. Conduct fire drills at least once a week during the first month of school and at least once each month for the remainder of the school term. Evacuation routes for students shall be posted in each room. Additionally, at least one simulated lock-down and crisis emergency evacuation activity should be conducted early in the school year.

C. Each school shall have contingency plans for emergencies that include staff certified in cardiopulmonary resuscitation (CPR), the Heimlich maneuver, and emergency first aid. In addition, the school administration shall ensure that the school has:

1. Written procedures to follow in emergencies such as fire, injury, illness, allergic reactions, and violent or threatening behavior. The plan shall be outlined in the student handbook and discussed with staff and students during the first week of each school year;

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2. Space for the proper care of students who become ill;
3. A written procedure, in accordance with guidelines established by the local school board, for responding to violent, disruptive or illegal activities by students on school property or during a school sponsored activity ; and
4. Written procedures to follow for the safe evacuation of persons with special physical, medical, or language needs who may need assistance to exit a facility.

Part VII  
School and Community Communications

8 VAC 20-131-270. School and community communications.

A. Each school shall promote communication and foster mutual understanding with parents and the community. Each school shall:

1. Involve parents, citizens, community agencies, and representatives from business and industry in developing, disseminating, and explaining the biennial school plan; on advisory committees; in curriculum studies; and in evaluating the educational program.

2. Provide annually to the parents and the community the School Performance Report Card in a manner prescribed by the board. The information contained therein will be for the most recent three-year period. Such information shall include but not be limited to:

a. Virginia assessment program results including the percentage of students tested, as well as the percentage of students not tested. Virginia assessment program results by percentage of participation and proficiency and disaggregated by student subgroups.

~~[b. Performance of student subgroups on the Virginia assessment program as appropriate.]~~

~~[be.]~~ The accreditation rating awarded to earned by the school.

~~[ce.]~~ Attendance rates for students.

~~[de.]~~ Information related to school safety to include, but not limited to, incidents of crime and physical violence ~~[(including fighting and other serious offenses), possession of firearms, and possession of other weapons].~~

~~[ef.]~~ Information related to qualifications and experience educational attainment of the teaching staff ~~[including the percentage of the school's teachers endorsed in the area of their primary teaching assignment].~~

~~[fg.]~~ In addition, secondary schools' School Performance Report Cards shall include the following:

(1) Advanced Placement (AP) information to include percentage of students who take AP courses and percentage of those students who take AP tests;

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- (2) International Baccalaureate (IB) and Cambridge course information to include percentage of students who are enrolled in IB or Cambridge programs and percentage of students who receive IB or Cambridge Diplomas;
  - (3) College-level course information to include percentage of students who take college-level courses including dual enrollment courses;
  - (4) ~~[Number and Pp]~~percentage of (i) graduates by diploma type as prescribed by the Board of Education, (ii) certificates awarded to the senior class including GED credentials, and (iii) students who do not complete high school;
  - (5) ~~[Information on the The]~~ number of students obtaining industry certifications, and passing state licensure examinations and occupational competency assessments while still in high school; and
  - (6) ~~[Number and Pp]~~percentage of drop-outs.
3. Cooperate with business and industry in formulating career and technical educational programs and conducting joint enterprises involving personnel, facilities, training programs, and other resources.
  4. Encourage and support the establishment and/or continuation of a parent-teacher association or other organization and work cooperatively with it.
- B. At the beginning of each school year, each school shall provide to its students' parents or guardians information on the availability of and source for receiving:
1. The learning objectives developed in accordance with the provisions of 8 VAC 20-131-70 to be achieved at their child's grade level or, in high school, a copy of the syllabus for each of their child's courses, and a copy of the school division promotion, retention, and remediation policies;
  2. The Standards of Learning applicable to the child's grade or course requirements and the approximate date and potential impact of the child's next SOL testing; and
  3. An annual notice to students in all grade levels of all requirements for Standard, **Standard Technical**, Advanced Studies, **Advanced Technical** and Modified Standard Diplomas, and the board's policies on promotion and retention as outlined in 8 VAC 20-131-30.

The division superintendent shall report to the department compliance with this subsection through the pre-accreditation eligibility procedures in 8 VAC 20-131-290.

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## Part VIII

## School Accreditation

8 VAC 20-131-280. Expectations for school accountability.

A. Schools will be accredited annually based on compliance with pre-accreditation eligibility requirements and achievement of the school accountability requirements of 8 VAC 20-131-300 C.

B. Each school shall be accredited based, primarily, on achievement of the criteria established in 8 VAC 20-131-30 and in 8 VAC 20-131-50 as specified below:

1. The percentage of students passing the Virginia assessment program tests in the four core academic areas administered in the school, with the accreditation rating calculated on a trailing three-year average that includes the current year scores and the scores from the two most recent years in each applicable academic area, or on the current year's scores, whichever is higher.

2. The percentage of students graduating from or completing high school based on a graduation and completion index prescribed by the Board of Education. The accreditation rating of any school with a twelfth grade shall be determined based on achievement of required SOL pass rates and percentage points on the board's graduation and completion index. School accreditation shall be determined by the school's current year index points or a trailing three-year average of index points that includes the current year and the two most recent years, whichever is higher. The Board of Education's graduation and completion index shall include weighted points for diploma graduates (100 points), GED recipients (75 points), students not graduating but still in school (70 points), and students earning certificates of program completion ([60-25] points). The Board of Education's graduation and completion index shall account for all students in the graduating class's ninth-grade cohort, plus students transferring in, minus students transferring out and deceased students. Those students who are not included in one of the preceding categories [~~i.e. students who dropout~~] will also be included in the index.

2.3. The number of students who successfully complete a remediation recovery program.

3.4. Schools, with grade configurations that do not house a grade or offer courses for which SOL tests or additional tests approved by the Board of Education as outlined in 8 VAC 20-131-110 are administered, will be paired with another school in the division housing one or more of the grades in which SOL tests are administered. The pairing of such schools will be made upon the recommendation of the local superintendent. The schools should have a "feeder" relationship and the grades should be contiguous.

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C. Subject to the provisions of [8 VAC 20-131-330-350], the governing school board of special purpose schools such as those provided for in § 22.1-26 of the Code of Virginia, Governor's schools, special education schools, alternative schools, or career and technical schools that serve as the student's school of principal enrollment may seek approval of an alternative accreditation plan from the Board of Education. Schools offering alternative education programs and schools with ~~[an enrollment~~ a graduation cohort of] 50 or fewer students ~~[in the ninth grade cohort as defined by the graduation rate formula adopted by the Board]~~ may request that the Board ~~[of Education]~~ approve an alternative accreditation plan to meet the graduation and completion index benchmark. Special purpose schools with alternative accreditation plans shall be evaluated on standards appropriate to the programs offered in the school and approved by the board prior to August 1 of the school year for which approval is requested. Any student graduating from a special purpose school with a Standard, Advanced Studies, or Modified Standard Diploma must meet the requirements prescribed in 8 VAC 20-131-50.

D. When calculating the passing rates on Virginia assessment program tests for the purpose of school accreditation, the following tolerances for limited English proficient (LEP) and transfer students will apply:

1. The scores of LEP students enrolled in Virginia public schools fewer than 11 semesters may be removed from the calculation used for the purpose of school accreditation required by 8 VAC 20-131-280 B and 8 VAC 20-131-300 C. Completion of a semester shall be based on school membership days. Membership days are defined as the days the student is officially enrolled in a Virginia public school, regardless of days absent or present. For a semester to count as a completed semester, a student must have been in membership for a majority of the membership days of the semester. These semesters need not be consecutive.
2. In accordance with the provisions of 8 VAC 20-131-30, all students who transfer into Virginia public schools are expected to take and pass all applicable SOL tests in the content areas in which they receive instruction.
3. All students who transfer within a school division shall have their scores counted in the calculation of the school's accreditation rating. Students who transfer into a Virginia school from home instruction, or from another Virginia school division, another state, or another country, in grades kindergarten through 8 shall be expected to take all applicable SOL tests or additional tests approved by the board as outlined in 8 VAC 20-131-110. If the transfer takes place after the 20th instructional day following the opening of school, the scores on these tests may be used in calculating school accreditation ratings.
4. Students who transfer into a Virginia middle or high school from home instruction, or from another state or country, and enroll in a course for which there is an end-of-course SOL test, shall be expected to take the test or additional tests for that course approved by the board as outlined in 8 VAC 20-131-110. If the transfer takes place

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after 20 instructional hours per course have elapsed following the opening of school or beginning of the semester, if applicable, the scores on those tests may be used in calculating school accreditation ratings in the year the transfer occurs.

5. Students who enroll on the first day of school and subsequently transfer to a school outside of the division for a total amount of instructional time equal to or exceeding 50 percent of a current school year or semester, whether the transfer was a singular or multiple occurrence, and return during the same school year shall be expected to take any applicable SOL test. The scores of those tests may be used in calculating the school accreditation rating in the year in which the transfers occur.

~~6. The board may alter the inclusions and exclusions from the accreditation calculations by providing adequate notice to local school boards.~~

E. The Board of Education may adopt special provisions related to the administration and use of any Virginia assessment program test in a content area as applied to these regulations. The Board of Education may also adopt special provisions related to the administration and use of the graduation and completion index, as prescribed by the Board. The Board of Education may also alter the inclusions and exclusions from the accreditation calculations by providing adequate notice to local school boards. [The Board may add new tests or discontinue the use of existing tests in the Virginia Assessment Program by providing adequate notice to local school boards.]

F. As a prerequisite to the awarding of an accreditation rating as defined in 8 VAC 20-131-300, each new or existing school shall document, in a manner prescribed by the board, the following: (i) the division's promotion/retention policies developed in accordance with the requirements of 8 VAC 20-131-30, (ii) compliance with the requirements to offer courses that will allow students to complete the graduation requirements in 8 VAC 20-131-50, (iii) the ability to offer the instructional program prescribed in 8 VAC 20-131-70 through 8 VAC 20-131-100, (iv) the leadership and staffing requirements of 8 VAC 20-131-210 through 8 VAC 20-131-240, and (v) the facilities and safety provisions of 8 VAC 20-131-260. The division superintendent shall report to the department compliance with this subsection through the pre-accreditation eligibility procedures in 8 VAC 20-131-290.

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8 VAC 20-131-290. Procedures for certifying accreditation eligibility.

A. Schools will be accredited under these standards annually based, in part, on compliance with the pre-accreditation eligibility requirements described in 8 VAC 20-131-280 F.

B. To be eligible for accreditation, the principal of each school and the division superintendent shall report to the Department of Education:

1. The extent to which each school continues to meet standards reported as met in the previous year described in 8 VAC 20-131-280 F.
2. That the SOL have been fully incorporated into the school division's curriculum in all accreditation-eligible schools and the SOL material is being taught to all students eligible to take the SOL tests. This shall be certified by each school division superintendent as part of the pre-accreditation eligibility determination process.
3. Actions taken to correct any noncompliance issues cited in the previous year.
4. Compliance with subsection B of 8 VAC 20-131-270.

The principal of each school and the division superintendent shall submit pre-accreditation eligibility reports in a manner prescribed by the board to the Department of Education. Failure to submit the reports on time will constitute grounds for denying accreditation to the school.

C. In keeping with provisions of the Standards of Quality, and in conjunction with the six-year long range comprehensive plan of the division, each school shall prepare and implement a biennial school plan which shall be available to students, parents, staff, and the public. Each biennial school plan shall be evaluated as part of the development of the next biennial plan. Schools may use other plans to satisfy the requirement for the biennial plan with prior written approval from the Department of Education.

D. With the approval of the local school board, local schools seeking to implement experimental or innovative programs, or both, that are not consistent with these standards shall submit a waiver request, on forms provided, to the board for evaluation and approval prior to implementation. The request must include the following:

1. Purpose and objectives of the experimental/innovative programs;
2. Description and duration of the programs;
3. Anticipated outcomes;

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4. Number of students affected;
5. Evaluation procedures; and
6. Mechanisms for measuring goals, objectives, and student academic achievement.

Except as specified below, the board may grant, for a period up to five years, a waiver of these regulations that are not mandated by state or federal law or designed to promote health or safety. The board may grant all or a portion of the request. Waivers of requirements in 8 VAC 20-131-30, 8 VAC 20-131-50, 8 VAC 20-131-70, and 8 VAC 20-131-280 through 8 VAC 20-131-340 shall not be granted, and no waiver may be approved for a program which would violate the provisions of the Standards of Quality.

8 VAC 20-131-300. Application of the standards.

A. Schools that meet the pre-accreditation eligibility requirements prescribed in 8 VAC 20-131- 280 F shall be assigned one of the following ratings as described in this section:

1. Fully Accredited;
2. Accredited with Warning in (specified academic area or areas and/or in achievement of the minimum threshold for the graduation and completion index);
3. Accreditation Denied;
4. Conditionally Accredited;

~~[5. Accreditation Withheld/Improving School Near Accreditation (rating shall not be awarded after academic year ending in 2007, based on tests administered in 2005-2006). Provisionally Accredited-Graduation Rate];~~

B. Compliance with the student academic achievement expectations shall be documented to the board directly through the reporting of the results of student performance on SOL tests and other alternative means of assessing student academic achievement as outlined in 8 VAC 20-131-110. To facilitate accurate reporting of the graduation and completion index, the State Testing Identifier (STI) for students who transfer into a Virginia public school from another Virginia public school shall be retained by the receiving school. Compliance with other provisions of these regulations will be documented in accordance with procedures prescribed by the Board of Education.

C. Accreditation ratings defined. Accreditation ratings awarded in an academic year are based upon Virginia assessment program scores from the academic year immediately prior to the year to which the accreditation rating applies. Accreditation ratings are defined as follows:

1. Fully accredited.

~~a. With tests administered in the academic year 2005-2006 for the accreditation ratings awarded for academic year 2006-2007, a school will be rated Fully Accredited when its eligible students meet the pass rate of 70% in each of the four core academic areas, except the pass rates required shall be 75% in third grade and fifth grade English and 50% in third grade science and history/social science.~~

~~b a.~~ With tests administered in the academic years 2006-2007, 2007-2008, and 2008-2009 [ , and 2009-2010 ] for the accreditation ratings awarded for academic years 2007-2008, 2008-2009, and 2009-2010 [ , and 2010-2011 ] respectively, a school will be rated Fully Accredited when its eligible students meet the pass rate of

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70% in each of the four core academic areas except, the pass rates required shall be 75% in third-grade through fifth-grade English and 50 percent in third-grade science and history/social science.

**e b.** For schools housing grade configurations where multiple pass rates apply, the results of the tests may be combined in each of the four core academic areas for the purpose of calculating the school's accreditation rating provided the school chooses to meet the higher pass rate.

**d c.** With tests administered beginning in the academic year ~~[2009-10 2010-2011]~~ for the accreditation ratings awarded for school year ~~[2010-11-2011-2012]~~ and beyond a school will be rated Fully Accredited when its eligible students meet the pass rate of 75% in English and the pass rate of 70% in mathematics, science, and history and social science. Additionally, each school with a graduating class shall achieve a minimum of [ 80 85 ] percentage points on the Board of Education's graduation and completion index, as described in 8 VAC 20-131-280 B. 2, to be rated Fully Accredited.

**e d.** For accreditation purposes, the pass rate will be calculated as single rates for each of the four core academic areas by combining all scores of all tests administered in each subject area.

2. Accredited with Warning (in specific academic ~~area or areas~~ areas and/or in achievement of the minimum threshold for the graduation and completion index). A school will be Accredited with Warning (in specific academic ~~area or areas~~ areas and/or in achievement of the minimum threshold for the graduation and completion index) if it has failed to achieve Fully Accredited status. Such a school may remain in the Accredited with Warning status for no more than three consecutive years.

3. Accreditation Denied. Based on a school's academic performance ~~during academic years ending in 2006 and beyond,~~ and/or achievement of the minimum threshold for the graduation and completion index a school shall be rated Accreditation Denied if it fails to meet the requirements to be rated Fully Accredited [or Provisionally Accredited-Graduation Rate], for the preceding three consecutive years or for three consecutive years anytime thereafter.

In any school division in which one-third or more of the schools have been rated Accreditation Denied, the superintendent shall be evaluated by the local school board with a copy of such evaluation submitted to the Board of Education no later than December 1 of each year in which such condition exists. In addition, the Board of Education may take action against the local school board as permitted by the Standards of Quality due to the failure of the local board to maintain accredited schools.

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~~4. Accreditation Withheld/Improving School Near Accreditation. A school that has never met the requirements to be rated Fully Accredited by the academic year ending in 2006 and subject to being awarded a rating of Accreditation Denied may apply to the board for this accreditation designation for 2006-2007. To be eligible, the school must meet each of the following criteria:~~

~~a. With assessments administered in 2005-2006 at least 70% of its students must have passed the applicable English SOL tests except at third and fifth grade where the requirement is 75%.~~

~~b. With assessments administered in 2005-2006, a combined pass rate of 60% of its students must have passed the Virginia assessment program tests in the other three core academic areas.~~

~~c. In each academic area in which the pass rate is below the rate required to be rated Fully Accredited, the school's pass rate must have increased by at least 25 percentage points as compared to the pass rates on tests taken during the academic year ending in 1999.~~

~~This rating shall not be awarded after the 2006-2007 academic year.~~

~~5~~ 4. Conditionally Accredited. New schools that are comprised of students from one or more existing schools in the division will be awarded ~~[this a Conditionally Accredited-New]~~ status for one year pending an evaluation of the school's eligible students' performance on SOL tests or additional tests approved by the Board of Education to be rated Fully Accredited. ~~[This A Conditionally Accredited-Reconstituted]~~ rating may ~~[also]~~ be awarded to a school that is being reconstituted in accordance with the provisions of 8 VAC 20-131-340 upon approval by the Board of Education. A school awarded this rating under those circumstances will revert to a status of Accreditation Denied if it fails to meet the requirements to be rated Fully Accredited by the end of the agreed upon term or if it fails to have its annual application for such rating renewed.

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5. Provisionally Accredited-Graduation Rate. With tests administered in the academic years ~~[2009-2010,]~~ 2010-2011, 2011-2012, 2012-2013, 2013-2014~~[, 2014-2015]~~ for the accreditation ratings awarded for academic years ~~[ 2010-2011, ]~~ 2011-2012, 2012-2013, 2013-2014, ~~[and] 2014-2015[~~, and 2015-2016~~] respectively, a school will be rated Provisionally Accredited [ -Graduation Rate ] when its eligible students meet SOL pass rates to be rated Fully Accredited but fails to achieve a minimum of [80 85] percentage index points on the Board of Education's graduation and completion index, but achieve the following minimum benchmarks for each year:~~

Graduation and Completion Index Benchmarks for Provisionally Accredited Ratings		
Academic Year	Accreditation Year	Index Percentage Points
<del>[ 2009-2010 2010-2011 ]</del>	<del>[ 2010-2011 2011- 2012 ]</del>	<del>[75 80]</del>
<del>[ 2010-2011 2011-2012 ]</del>	<del>[ 2011-2012 2012- 2013 ]</del>	<del>[76 81]</del>
<del>[ 2011-2012 2012-2013 ]</del>	<del>[ 2012-2013 2013- 2014 ]</del>	<del>[77 82]</del>
<del>[ 2012-2013 2013-2014 ]</del>	<del>[ 2013-2014 2014- 2015 ]</del>	<del>[78 83]</del>
<del>[ 2013-2014 2014-2015 ]</del>	<del>[ 2014-2015 2015- 2016 ]</del>	<del>[79 84]</del>

The last year in which this rating shall be awarded is the ~~[2014-2015 2015-2016]~~ accreditation year, based on tests administered in the ~~[2013-2014 2014-2015]~~ academic year.

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8 VAC 20-131-310. Action requirements for schools that are Accredited with Warning or ~~[Accreditation Withheld/Improving School Near Accreditation]~~ Provisionally Accredited-Graduation Rate.]

A. With such funds as are appropriated by the General Assembly, the Department of Education shall develop a school academic review process and monitoring plan designed to assist schools rated as Accredited with Warning. All procedures and operations for the academic review process shall be approved and adopted by the board.

Schools rated Accredited with Warning or ~~[Accreditation Withheld/Improving School Near Accreditation]~~ Provisionally Accredited-Graduation Rate] must undergo an academic review in accordance with guidelines adopted by the board and prepare a school improvement plan as required by subsection F of this section.

B. Any school that is rated Accredited with Warning in English or mathematics shall adopt a research-based instructional intervention that has a proven track record of success at raising student achievement in those areas as appropriate.

C. The superintendent and principal shall certify in writing to the Board of Education that such an intervention has been adopted and implemented.

D. The board shall publish a list of recommended instructional interventions, which may be amended from time to time.

E. Adoption of instructional interventions referenced in subsections B and D of this section shall be funded by eligible local, state, and federal funds.

F. A three-year School Improvement Plan must be developed and implemented, based on the results of an academic review of each school that is rated Accredited with Warning or ~~[Accreditation Withheld/Improving School Near Accreditation]~~ Provisionally Accredited-Graduation Rate] upon receipt of notification of the awarding of this rating and receipt of the results of the academic review. The plan:

1. Shall be developed with the assistance of parents and teachers and made available to the public;
2. Must include the components outlined in subsection G of this section; and
3. Must be approved by the division superintendent and the local school board and be designed to assist the school in meeting the student achievement standard to be Fully Accredited as outlined in 8 VAC 20-131-300.

G. The improvement plan shall include the following:

1. A description of how the school will meet the requirements to be Fully Accredited, for each of the years covered by the plan;
2. Specific measures for achieving and documenting student academic improvement;
3. A description of the amount of time in the school day devoted to instruction in the core academic areas;
4. Instructional practices designed to remediate students who have not been successful on SOL tests;
5. Intervention strategies designed to prevent further declines in student performance [and graduation rates];
6. Staff development needed;
7. Strategies to involve and assist parents in raising their child's academic performance;
8. The need for flexibility or waivers to state or local regulations to meet the objectives of the plan; and
9. A description of the manner in which local, state, and federal funds are used to support the implementation of the components of this plan.

As part of its approval of the school improvement plan, the board may grant a local school board a waiver from the requirements of any regulations promulgated by the board when such a waiver is available.

H. The school improvement plan and related annual reports submitted to the board shall provide documentation of the continuous efforts of the school to achieve the requirements to become rated Fully Accredited. The board shall adopt and approve all policies and formats for the submission of annual reports under this section. The reports shall be due no later than October 1 of the school year.

8 VAC 20-131-315. Action requirements for schools that are denied accreditation.

A. Any school rated Accreditation Denied in accordance with 8 VAC 20-131-300 shall be subject to actions prescribed by the Board of Education and shall provide parents of enrolled students and other interested parties with the following:

1. Written notice of the school's accreditation rating within 30 calendar days of the notification of the rating from the Department of Education;
2. A copy of the school division's proposed corrective action plan, including a timeline for implementation, to improve the school's accreditation rating; and
3. An opportunity to comment on the division's proposed corrective action plan. Such public comment shall be received and considered by the school division prior to finalizing the school's corrective action plan and a Board of Education memorandum of understanding with the local school board.

B. Any school rated Accreditation Denied in accordance with 8 VAC 20-131-300 shall be subject to actions prescribed by the Board of Education and affirmed through a memorandum of understanding between the Board of Education and the local school board. The local school board shall submit a corrective action plan to the Board of Education for its consideration in prescribing actions in the memorandum of understanding within 45 days of the notification of the rating. The memorandum of understanding shall be entered into no later than November 1 of the academic year in which the rating is awarded.

The local board shall submit status reports detailing implementation of actions prescribed by the memorandum of understanding to the Board of Education. The status reports shall be signed by the school principal, division superintendent, and the chair of the local school board. The school principal, division superintendent, and the chair of the local school board may be required to appear before the Board of Education to present status reports.

The memorandum of understanding may also include but not be limited to:

1. Undergoing an educational service delivery and management review. The Board of Education shall prescribe the content of such review and approve the reviewing authority retained by the school division.
2. Employing a turnaround specialist credentialed by the state to address those conditions at the school that may impede educational progress and effectiveness and academic success.

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C. As an alternative to the memorandum of understanding outlined in subsection B of this section, a local school board may choose to reconstitute a school rated Accreditation Denied and apply to the Board of Education for a rating of Conditionally Accredited. The application shall outline specific responses that address all areas of deficiency that resulted in the Accreditation Denied rating and may include any of the provisions of subsection B of this section.

If a local school board chooses to reconstitute a school, it may annually apply for an accreditation rating of Conditionally Accredited as provided for in 8 VAC 20-131-300 C 5. The Conditionally Accredited rating may be granted for a period not to exceed three years if the school is making progress toward a rating of Fully Accredited in accordance with the terms of the Board of Education's approval of the reconstitution application. The school will revert to a status of Accreditation Denied if it fails to meet the requirements to be rated Fully Accredited by the end of the three-year term or if it fails to have its annual application for such rating renewed.

D. The local school board may choose to close a school rated Accreditation Denied or to combine such school with a higher performing school in the division.

E. A local school board that has any school with the status of Accreditation Denied shall annually report each school's progress toward meeting the requirements to be rated Fully Accredited to the Board of Education. The local board shall submit such report in a manner prescribed by the Board of Education no later than October 1 of each year. Such reports on each school's progress shall be included in the Board of Education's annual report on the condition and needs of public education to the Governor, and the General Assembly submitted on November 15 of each year.

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8 VAC 20-131-320. Provisional accreditation benchmarks. (Repealed.)

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8 VAC 20-131-325. Recognitions and rewards for school and division accountability performance.

A. Schools and divisions may be recognized by the Board of Education in accordance with guidelines it shall establish [for the Virginia Index of Performance (VIP) incentive program]. Such recognition may include:

1. Public announcements recognizing individual schools and divisions;
2. Tangible rewards;
3. Waivers of certain board regulations;
4. Exemptions from certain reporting requirements; or
5. Other commendations deemed appropriate to recognize high achievement.

In addition to board recognition, local school boards shall adopt policies to recognize individual schools through public announcements, media releases, participation in community activities for input purposes when setting policy relating to schools and budget development, as well as other appropriate recognition.

B. A school that maintains a passing rate on Virginia assessment program tests or additional tests approved by the board as outlined in 8 VAC 20-131-110 of 95% or above in each of the four core academic areas for two consecutive years may, upon application to the Department of Education, receive a waiver from annual accreditation. A school receiving such a waiver shall be Fully Accredited for a three-year period. However, such school shall continue to annually submit documentation in compliance with the pre-accreditation eligibility requirements described in 8 VAC 20-131-280 F.

C. Schools may be eligible to receive the Governor's Award for Outstanding Achievement. This award will be given to schools rated Fully Accredited that significantly increase the achievement of students within student subgroups in accordance with guidelines prescribed by the Board of Education.

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8 VAC 20-131-330. Waivers. (Repealed.)

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8 VAC 20-131-340. Special provisions and sanctions.

A. Any school in violation of these regulations shall be subject to appropriate action by the Board of Education including, but not limited to, the withholding or denial of a school's accreditation.

B. A school's accreditation rating may be withheld by action of the Board of Education for any school found to be in violation of test security procedures pursuant to § 22.1-19.1 of the Code of Virginia. Withholding of a school's accreditation rating shall not be considered an interruption of the three-consecutive-year period for purposes of receiving an Accreditation Denied status pursuant to 8 VAC 20-131-300.

C. The Board of Education may exercise its authority to seek school division compliance with school laws pursuant to relevant provisions of the Code of Virginia when any school within a division is rated Accreditation Denied.

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8 VAC 20-131-350. Waivers.

Waivers of some of the requirements of these regulations may be granted by the Board of Education based on submission of a request from the division superintendent and chairman of the local school board. The request shall include documentation of the need for the waiver. In no event shall waivers be granted to the requirements of Part III (8 VAC 20-131-30 et seq.) of these regulations.

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8 VAC 20-131-360. Effective date.

[The provisions in 8 VAC 20-131-30 B. relating to double testing and the provisions in 8 VAC 20-131-60 C. relating to Virtual Virginia shall become effective upon final adoption in accordance with the Administrative Process Act.] Unless otherwise specified, [the remainder of] these regulations shall be effective for the ~~2006-2007~~ [2009-2010-2010-2011] academic year.