

# Virginia Board of Education Agenda Item



**Agenda Item:** A

**Date:** March 28, 2013

<b>Title</b>	Final Review of Proposed <i>Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities</i>		
<b>Presenter</b>	Mr. John Eisenberg, Assistant Superintendent for Special Education and Student Services		
<b>E-mail</b>	<a href="mailto:John.Eisenberg@doe.virginia.gov">John.Eisenberg@doe.virginia.gov</a>	<b>Phone</b>	(804) 225-2711

**Purpose of Presentation:**

Action required by state or federal law or regulation.

**Previous Review or Action:**

Previous review and action. Specify date and action taken below:

Date: February 28, 2013

Action: First Review of Proposed *Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities*

**Action Requested:**

Final review: Action requested at this meeting.

**Alignment with Board of Education Goals: Please indicate (X) all that apply:**

x	Goal 1: Accountability for Student Learning
x	Goal 2: Rigorous Standards to Promote College and Career Readiness
	Goal 3: Expanded Opportunities to Learn
	Goal 4: Nurturing Young Learners
	Goal 5: Highly Qualified and Effective Educators
	Goal 6: Sound Policies for Student Success
	Goal 7: Safe and Secure Schools
	Other Priority or Initiative. Specify:

**Background Information and Statutory Authority:**

Goal 1: The Board of Education must establish requirements for the Standard and Advanced Studies Diplomas.

Goal 2: The proposed guidelines support implementation of the 2012 General Assembly’s HB 1061 and SB 489, which amended § 22.1-253.13:4 of the *Code of Virginia* to strengthen postsecondary education and workplace readiness opportunities for all students and to consolidate the number of Board of Education approved diplomas.

As a result of the legislation, the Board of Education was required to adopt emergency regulations to establish the new diploma requirements, effective for students entering the ninth grade for the first time

in 2013-2014. Among other requirements, the legislation eliminated the Modified Standard Diploma and required the Board to “make provision in its regulations for students with disabilities to earn a standard diploma.”

In June 2012, the Board of Education adopted emergency amendments to the Standards of Accreditation (SOA) to permit students with disabilities to have “credit accommodations” to earn a Standard Diploma. The student’s Individual Education Program (IEP) or 504 Plan would specify whether credit accommodations permitted by the Board would be applicable for the student.

The emergency amendments to the Standards of Accreditation include the following:

8 VAC 20-131-5. Definitions.

*"Credit accommodations" means adjustments to meet the standard and verified credit requirements for earning a Standard Diploma for students with disabilities.*

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

2. Requirements for a Standard Diploma.

*3. The Board of Education shall establish, through guidelines, credit accommodations to the standard and verified credit requirements for a Standard Diploma. Such credit accommodations for students with disabilities may include:*

*a. Approval of alternative courses to meet the standard credit requirements;*

*b. Modifications to the requirements for local school divisions to award locally awarded verified credits;*

*c. Approval of additional tests to earn a verified credit;*

*d. Adjusted cut scores required to earn verified credit; and*

*e. Allowance of work-based learning experiences.*

*The student’s Individual Education Program (IEP) or 504 Plan would specify any credit accommodations that would be applicable for the student.*

### **Summary of Important Issues:**

The proposed guidelines outlined in Attachment A were developed to provide school divisions with a list of approved “credit accommodations” for use by students with disabilities to obtain a Standard Diploma under *Regulations Establishing Standards for Accrediting Public Schools in Virginia* (8 VAC 20-131). They build and expand upon existing Board of Education approved flexibility provisions to earn standard and verified credits.

The proposed “credit accommodations” fall under the following general categories:

- Standards of Learning (SOL) assessments,
- Modification to the requirements for local school divisions to award locally awarded verified credit, and
- Modification of course offerings to earn standard and verified credits.

A student who earns a Standard Diploma, with or without credit accommodations, will be prepared for successful transition to postsecondary training and a career. The expectations for earning a Standard Diploma, beginning with the ninth-grade class in 2013-2014, are rigorous. The requirements for the Standard Diploma are higher than the requirements for earning a Modified Standard Diploma, which is being eliminated. All students must earn standard and verified credits in high school mathematics, English, writing, and history courses. All students earning a Standard Diploma must earn a career and

technical credential and take a virtual course—either credit or non-credit bearing. Credit accommodations allow students with disabilities different pathways and approaches to demonstrating mastery of the required content.

The proposed guidelines were drafted with the assistance of multiple stakeholder groups including parents, special educators, local administrators, special education advocacy groups, superintendents and members of the State Special Education Advisory Committee.

At its February meeting, the Board authorized staff to post the proposed guidelines on the Department Web site for public comment. The proposed guidelines were posted through March 27, 2013.

Over 80 public comments were received and reviewed. Feedback came from a variety of stakeholders including; parents, institutes of higher education, community service boards, private advocacy organizations and local educational agencies (stakeholders included, but not limited to, superintendents, executive directors, special education directors, teachers, administrators, guidance counselors, related service professionals and members of local Special Education Advisory Committees).

Feedback was received from over 60 respondents who support the proposed credit accommodations guidelines. A summary of the public comments received from those supporting the guidelines are highlighted below. Respondents commented that:

- A large and diverse group of stakeholders was used in the development of the proposed guidelines,
- Flexibility options outlined in the proposed accommodations would assist local school divisions in providing the supports necessary for this unique population of students to obtain a Standard Diploma,
- The Individualized Education Program (IEP) team or 504 Committee team is the most appropriate group to make decisions on specific credit accommodations for these students,
- The proposed guidelines keep the rigor of the Standard Diploma intact and significantly increases expectations of those students who would have previously obtained a Modified Standard Diploma,
- The expanded use of locally awarded verified credit administrative procedures for Reading, Writing and Mathematics is strongly supported.

Feedback from less than 20 respondents expressed concerns that expectations for students with disabilities may be lowered. Respondents commented that:

- These proposed guidelines are holding students with disabilities to lowered expectations,
- They share concerns about the possible degree of local variability in awarding credit accommodations to students with disabilities,
- Inappropriate use of the Virginia Modified Achievement Standards Test (VMAST) might occur similar to those reported under the Virginia Grade Level Alternative (VGLA), and
- Credit accommodations may have a negative impact on the rigor and perceived value of the Standard Diploma.

A change in the form of a language substitution was made to the proposed guidelines from the version presented for first review at the February meeting. On page seven under item three (Locally Awarded Verified Credits) ‘divisions’ was substituted with ‘boards’ to reflect the appropriate terminology referenced in the Standards for Accrediting Public Schools in Virginia (8VAC20-131).

**Impact on Fiscal and Human Resources:**

The administrative impact required to develop these guidelines will be absorbed within existing resources. Local school divisions will have to use existing resources obtained through federal funds allocated by Individuals with Disabilities Education Act (IDEA). The increased flexibility outlined in these guidelines might cause local school divisions to have to realign staffing in order to implement these credit accommodations.

**Timetable for Further Review/Action:**

Upon approval of the final revisions to the *Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities*, the Department of Education will post the guidance on the Department Web site and inform constituents through a variety of channels including a Superintendent’s Memo.

**Superintendent's Recommendation:**

The Superintendent of Public Instruction recommends that the Board of Education approve the proposed *Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities*.

**Proposed Guidelines for Standard Diploma  
Credit Accommodations for Students with Disabilities  
March 28, 2013**

***Background***

The 2012 General Assembly passed, and Governor McDonnell signed into law, HB 1061 and SB 489, which amended § 22.1-253.13:4 of the *Code of Virginia* to strengthen postsecondary education and workplace readiness opportunities for all students, and to consolidate the number of Board of Education approved diplomas. The legislation requires the Board to adopt emergency regulations to establish the new diploma requirements, effective for students entering the ninth grade for the first time in 2013-2014. Among other requirements, the legislation eliminates the Modified Standard Diploma and requires the Board to “make provision in its regulations for students with disabilities to earn a standard diploma.” In June 2012, the Board of Education adopted emergency amendments to the Standards of Accreditation (SOA) to permit students with disabilities to have “credit accommodations” to earn a Standard Diploma. The student’s Individual Education Program (IEP) or 504 Plan would specify whether credit accommodations permitted by the Board would be applicable for the student.

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The emergency amendments to the Standards of Accreditation included the following:

8 VAC 20-131-5. Definitions.

*"Credit accommodations" means adjustments to meet the standard and verified credit requirements for earning a Standard Diploma for students with disabilities.*

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

2. Requirements for a Standard Diploma.

3. *The Board of Education shall establish, through guidelines, credit accommodations to the standard and verified credit requirements for a Standard Diploma. Such credit accommodations for students with disabilities may include:*

*a. Approval of alternative courses to meet the standard credit requirements;*

*b. Modifications to the requirements for local school divisions to award locally awarded verified credits;*

*c. Approval of additional tests to earn a verified credit;*

*d. Adjusted cut scores required to earn verified credit; and*

*e. Allowance of work-based learning experiences.*

*The student’s Individual Education Program (IEP) or 504 Plan would specify any credit accommodations that would be applicable for the student.*

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***Current Flexibility Options Available to Earn Standard and Verified Credits***

***Assessments Used to Verify Credits***

1. Accommodations for students with disabilities provided on all SOL assessments

2. Substitute tests for verified credit approved by the Board of Education
3. Virginia Modified Achievement Standards Test (VMAST) available in Algebra I and end-of-course reading for certain students with disabilities

*Locally Awarded Verified Credits*

4. Locally-awarded verified credit—up to four verified credits for Standard Diploma
  - a. Student may be eligible to earn locally-awarded verified credits in science or history/social science (8 VAC 20-131-110)
    - i. Student must pass the high school course,
    - ii. Score within 375-399 scale score range on any administration of the Standards of Learning test after taking the test at least twice, and
    - iii. Demonstrate achievement in the academic content through an appeal process administered at the local level.
  - b. Student may earn verified credits by passing a Board-approved industry credentialing exam—two credits may be earned for a single career and technical education (CTE) exam if at least two standard credits are associated with the credential

*Career and Technical (CTE) Industry Credentials*

5. Workplace Readiness Skills for the Commonwealth Assessment
  - a. Students are able to pre-test, receive remediation and retake assessment to earn CTE credential
6. Career Readiness Certificate (CRC) (battery of three tests)
  - a. Student can retake failed portions of assessment

Both of these CTE industry credentials will satisfy graduation requirements for the Standard Diploma (8 VAC 20-131-50).

*Course Content Integration*

7. Content courses may be split into two sections or integrated over a sequence of courses  
Examples: Algebra I part 1 for 1 elective credit, Algebra I part II for 1 mathematics credit; Algebra I/Geometry/Algebra II, 3-year sequence
8. Career and Technical Education (CTE) coursework combined with courses required for graduation over two blocks/periods  
Example: Biology and Biomedical Technician offered in two consecutive periods, with collaboration between the science and CTE teachers

## **Proposed Standard Diploma Credit Accommodations for Students with Disabilities**

### *Assessments Used to Verify Credits*

1. Identify and approve additional substitute tests to earn a verified credit. The Board of Education may from time to time approve additional tests that are recommended by the Superintendent of Public Instruction for the purpose of awarding verified credit. The Virginia Department of Education may partner with a local school division in the procedure to nominate an additional test. Such additional tests, which enable students to earn verified units of credit, must, at a minimum, meet the following criteria:
  - a. The test must be standardized and graded independently of the school or school divisions in which the test is given;
  - b. The test must be knowledge based;
  - c. The test must be administered on a multistate or international basis, or administered as part of another state's accountability assessment program; and
  - d. 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.
  
2. Permit the continued use of the Virginia Modified Achievement Standards Test (VMAST) for verified credit purposes for Algebra I and EOC reading. The student must meet all eligibility requirements in effect for the 2012-2013 school year and meet all of the following criteria to be eligible to take the VMAST for verified credit purposes:
  - a. Student must pass the high school course; and
  - b. Score 374 or below on the end-of-course Standards of Learning test after taking the test at least twice

Beginning in 2014-2015, scores of students who participate in VMAST will no longer be included in the participation rate or pass rate calculations for federal accountability, as required for approval of Virginia's *Elementary and Secondary Education Act (ESEA)* flexibility application.

### *Locally Awarded Verified Credits*

3. Permit local school boards to award locally awarded verified credits in reading, writing, and mathematics, in addition to science and history, to students with disabilities. Use the same criteria for awarding credits currently approved for science and history. Eligible students must:
  - a. Pass the high school course,
  - b. Score within 375-399 scale score range on any administration of the Standards of Learning test after taking the test at least twice, and
  - c. Demonstrate achievement in the academic content through an appeal process administered at the local level.

### *Course Offerings*

4. Approve additional course options available only to students with disabilities to meet the standard credit requirements for the Standard Diploma

- a. Augment the Personal Finance course (3120) to include the 21 Work Readiness Skills (WRS) for the Commonwealth. Allow this augmented course to meet the Economics and Personal Finance requirement *if* the student has earned at least 3 standard credits in history and social science. The economics strand in these courses would be deemed a credit accommodation. Upon completion of the augmented Personal Finance course, the student may take the WRS assessment to earn the Board-approved Work Readiness Skills credential. This approach would satisfy the graduation requirements for economics and personal finance, history and social sciences, and the workplace credential.
- b. Establish minimum content courses in the subject areas required for verified credits and provide flexibility in how the courses are delivered. Allow parts I and II of certain required courses to each earn a standard credit towards the total number required in the subject area. The student must successfully complete:
  - i. 4 standard credits in English and 1 verified credit each in Reading and Writing
  - ii. 3 standard credits in mathematics that include Algebra I and Geometry, and 1 verified credit in mathematics
  - iii. 3 standard credits in science that include Earth Science and Biology, and 1 verified credit in science
  - iv. 3 standard credits in history and social science that include Virginia and U.S. History and Virginia and U.S. Government, and 1 verified credit in history and social science

*Additional Credit Accommodations*

5. The Board may, from time to time approve additional credit accommodations.

**Public Comments Received Regarding Guidelines for Standard Diploma Credit  
Accommodations for Students with Disabilities**

**From:** Angelique Wynkoop [mailto:awynkoop@culpeperschools.org]  
**Sent:** Thursday, February 28, 2013 12:21 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Cc:** Angela Neely; Eisenberg, John (DOE)  
**Subject:** Proposed Credit Accommodations

I respectfully submit the attached letter in support of proposed guidelines as submitted with regard to credit accommodations for students with disabilities to obtain a standard diploma.

Thank you,  
Angelique Wynkoop  
Elementary Curriculum Specialist  
Special Education Dept.  
Culpeper County Schools  
540-825-3677, ext. 3140.  
Fax: 540-727-0985

TO: Board of Education, Virginia Department of Education (VDOE)

CC: Mr. John Eisenberg, VDOE Assistant Superintendent for Special  
Education & Student Services

FROM: Angelique Wynkoop, Elementary Curriculum Specialist, Office of Special Education, Culpeper  
County Public Schools

RE: Public Comment Regarding Guidelines for Standard Diploma Credit Accommodations for  
Students with Disabilities

I am writing in reference to proposed guidelines for Standard Diploma Credit Accommodations for Students with Disabilities. I fully understand and wholeheartedly agree with the premise of the proposed guidelines and am concerned with the misinformation that you may have received.

As an administrator of special education programs and as a professional advocate of students with disabilities, I ask that you adopt the proposed guidelines as submitted with regard to credit accommodations for students with disabilities to obtain a standard diploma. With the elimination of the Modified Standard Diploma option for students with disabilities, we are charged to develop a reasonable and fair pathway for students with disabilities to earn a Standard Diploma. The guidelines were developed with multiple input from a varied group of stakeholders to include parents of students with disabilities, school division educators, representatives from professional educational organizations and university education training programs as well as from citizens of the Commonwealth.

At the present time, school divisions offer students with disabilities either an Individualized Education Program (IEP) diploma, a Standard or Advanced Standard Diploma. Given the diversity of our students, this demands that we recognize the full range of ability levels within each educational disability and take into account for the vast array of unique learning needs of each and every student. In short, we must create a pathway for differentiated accountability that does not reduce or minimize expectations nor compromise the rigor of instruction. Anything short of this would not only compromise the integrity of the Standard Diploma for all students, but sell short the ability and opportunity of students with disabilities to attainable post-secondary goals. The proposed guidelines provide such a conduit.

The proposed guidelines afford each student's IEP team the ability to adjust the student's program requirements to meet their unique learning needs. Some may view this as a diminished approach to a Standard Diploma. It is not.

For those of us who continue to work with students with disabilities each day, we must make available differentiation to provide a reasonable and equitable path of success for them. The accommodations for verified credits as outlined in 8 VAC 20-131-50 provides such venue.

Finally, if public schools are to maintain the instructional rigor for students with disabilities with equity, then alternative accommodations must be provided. The Virginia Department of Education with input from a group of varied stakeholders has presented a balanced, fair and equitable means for students with disabilities to obtain a Standard Diploma. I urge you to adopt them

Thank you for your time and consideration.

Sincerely,

Angelique Wynkoop  
Curriculum Specialist  
Office of Special Education  
Culpeper County Public Schools

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February 27, 2013

TO: Board of Education, Virginia Department of Education (VDOE)

CC: Mr. John Eisenberg, VDOE Assistant Superintendent for Special Education & Student Services

FROM:

RE: Public Comment Regarding Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

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Thank you for your time and consideration.

Sincerely,

Joyce H. Baker, Ed.D.  
Director of Special Education  
Surry County Public Schools

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## *Culpeper County Public Schools*

Office of the Division Superintendent

[www.culpeperschools.org](http://www.culpeperschools.org)

450 Radio Lane

Culpeper, Virginia 22701

Tel./TTY. (540) 825-3677

Fax (540) 825-6160

February 28, 2013

TO: Board of Education, Virginia Department of Education (VDOE)

CC: Mr. John Eisenberg, VDOE Assistant Superintendent for Special Education & Student Services

FROM: Jennifer Burriss, Curriculum Specialist for Culpeper County Public Schools

RE: Public Comment Regarding Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

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that does not reduce or minimize expectations nor compromise the rigor of instruction. Anything short of this would not only compromise the integrity of the Standard Diploma for all students, but sell short the ability and opportunity of students with disabilities to attainable post-secondary goals. The proposed guidelines provide such a conduit.

The proposed guidelines afford each student's IEP team the ability to adjust the student's program requirements to meet their unique learning needs. Some may view this as a diminished approach to a Standard Diploma. It is not. For those of us who continue to work with students with disabilities each day, we must make available differentiation to provide a reasonable and equitable path of success for them. The accommodations for verified credits as outlined in 8 VAC 20-131-50 provides such venue.

Finally, if public schools are to maintain the instructional rigor for students with disabilities with equity, then alternative accommodations must be provided. The Virginia Department of Education with input from a group of varied stakeholders has presented a balanced, fair and equitable means for students with disabilities to obtain a Standard Diploma. I urge you to adopt them

Thank you for your time and consideration.

Sincerely,

Jennifer Burriss  
Secondary Curriculum Specialist  
Office of Special Education  
Culpeper County Schools  
phone (540) 825-3677 ext. 3137  
fax (540) 727-0985

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**From:** Marlene Boyd [mailto:mboyd@russell.k12.va.us]  
**Sent:** Thursday, February 28, 2013 2:14 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:**

To Whom It May Concern:

The parents are hopeful and glad for the possible changes. As a faculty member I feel that these changes would level the playing field for our special needs students.

J. Marlene Boyd  
LD Teacher  
Honaker High School

Honaker, Va 24260

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**From:** JoAnna Parker [mailto:JParker@hanover.k12.va.us]  
**Sent:** Thursday, February 28, 2013 3:28 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:**

To the members of the Board of Education:

I wanted to take this opportunity to express my interest in the *Proposed Guidelines for Standard Diploma Credit Accommodations for Students*. Students with disabilities face a lifetime of barriers to their education. Although we work diligently to level the playing field so to speak, we cannot completely remove all barriers. The increased rigor and expectations for these students has been needed and welcomed. They are no longer sitting in a classroom at the back of the school (not seen and not heard). We work hard to include them in every way possible. We acknowledge there is still work to do, but we are moving forward. However, the removal of the modified diploma option has the potential to take us backward. Please consider and accept the proposed guidelines as a starting point for improving graduation outcomes for all students. Without the credit accommodation, numerous students will be forced to obtain a special diploma. Instead of increasing the rigor, we are giving them permission to take a back seat and achieve minimal basic standards.

As a stakeholder in this decision, I am pleased with the proposed guidelines that were suggested and feel that these will positively support our students in the goal of achieving a standard diploma. Thank you to VDOE for the work that went into developing these ideas.

In addition, I would like to ask that these options be available to all current high school students with disabilities as well.

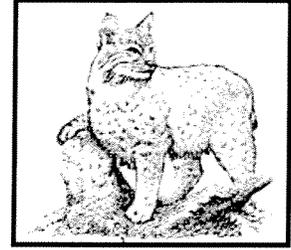
Thank you for your continued support.

JoAnna Parker  
Special Education Teacher  
Hanover High School  
*"Don't let the fear of striking out hold you back."* **Babe Ruth**

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## ***Boiling Spring Elementary***

5403 Boiling Spring Circle  
Covington, VA 24426  
(540) 965-1817  
(540) 965-1819 FAX



***Amy Rice Dew, Principal***

Honored Board Members:

It is my understanding that the 2012 General Assembly's HB 1061 and SB 489, which amended §22.1-253.13:4 of the *Code of Virginia* required the Board of Education to "make provision in its regulations for students with disabilities to earn a standard diploma." It is my humble opinion that the intention is to maintain the spirit of IDEIA and provide a free and appropriate public education and equal opportunity to obtain a standard diploma to students with special needs. I believe that the emergency amendments to the Standards of Accreditation being proposed by John Eisenberg, Assistant Superintendent for Special Education and Student Services, will do just that. I ask that you please support these amendments.

The law already provides for parents of students identified as being eligible for special education services an avenue to reject IEP proposals if the parents (or students at age of majority) do not wish to take advantage of the accommodations for which the IEP team has the legal authority to determine them eligible. In my opinion, this nullifies the concerns of advocates and parents opposing the proposed credit accommodations to obtaining a standard diploma. If a parent or student does not want the accommodations, they do not have to accept them. But, you, the Board are bound by law to uphold the right to a free and appropriate public education and equal opportunity to obtain a Standard Diploma for all students who are special education eligible. Please do not allow the voices of those protesting to nullify the statutory rights of all special education students. Please support the accommodations being proposed by the Virginia Department of Education to allow special education students to achieve a Standard Diploma.

Sincerely,  
Amy Rice Dew  
Principal  
Boiling Spring Elementary  
Alleghany County Public Schools

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Feedback on Proposed Standard Diploma Credit Accommodations  
For Students with Disabilities  
**Henrico County Public Schools**

Proposal	HCPS Support	Comments/Suggestions
Identify and approve additional substitute tests to earn a verified credit.	<b>YES</b>	Allow divisions to submit standardized assessments for consideration via an established vetting process with clearly delineated criteria.
Expand eligibility for the VMAST	<b>NO</b>	The history of alternative assessment for students with disabilities in Virginia has shown that the establishment of alternative assessment frequently results in negative and unintended changes in instructional programming to match assessment. The preference in both regulatory language and the avowed purpose of exceptional education is to maintain comparable high standards with additional supports to achieve. Creating and sustaining yet another alternative assessment continues to perpetuate the concept that the assessment drives the instructional programming and that there are students with disabilities who are not capable of being sufficiently supported to achieve proficiency using the instruments currently available. The preference would be to maintain the instrument and expand the accommodations.
Permit local school divisions to award locally awarded verified credits in reading, writing and mathematics, in addition to science and history, to students with disabilities.	<b>YES</b>	HCPS strongly supports this suggestion. It is in line with well-established practice in general education, there are current administrative structures in place that would support without extensive programmatic modification being required and it would allow students the opportunity to meet the same high standards as their peers. <i>Based on an analysis of 76 students who received a Modified Standard Diploma in HCPS in 2011-12, a full 89% of them would have benefited from this accommodation to varying degrees.</i>
Approve additional course offerings available only to students with disabilities.	<b>YES w/reservations</b>	The establishment of coursework for students with disabilities has the practical effect of segregating students. The best intentioned of parents and administrators will utilize alternatives driven by a fear of failure. The credentialing of the teachers would be a driving factor in HCPS support. Any proposed coursework should maintain the requirement that it be taught by an instructor who is endorsed in the content area NOT licensed as a special education teacher.
Augment the personal finance course to include the 21 Work Readiness Skills for the Commonwealth.	<b>YES</b>	
Establish minimum content courses	<b>YES</b>	In particular, the allowance of Part I and Part II

in the subject areas required for verified credit.		coursework that would allow the scaffolding often needed to support students with disabilities who may require additional time to solidify new information.
<p><b>Other Suggestions...</b></p> <p>HCPS was disappointed to note that the final VDOE proposal did not include two aspects of the initial bill presentations for consideration.</p> <p>First, the suggestion of adjusted cut scores required to earn verified credit. There has been precedence established in utilizing this tool as a means of accommodating students with disabilities. Rather than a unilateral adjustment, a comprehensive study of students with disabilities and the consideration of a cut score that correlates to a comparable percentage for general education students would have legitimacy. Every current SOL test has varying cut scores and those decisions are made frequently based on the establishment of parameters around what percentage of the material should be mastered and the performance of the general population on the assessment. Establishment of a cut score based on the material mastery average for students with disabilities comparable to their general education peers would at least be a starting point for discussion. In no case should the discrepancy exceed the range of the current achievement gap and incentives can be built in for increasing or annually reviewing the changes in the cut scores. This accommodation has the potential to establish a lower set of expectations and, thus, would require careful consideration, but we feel it should be explored as a matter of due diligence.</p> <p>Second, the allowance of work-based learning experiences is a positive development that correlates well to the established purpose of awarding a diploma. The diploma establishes a credential that the student has mastered competencies that allow them to contribute effectively to both societal and vocational efforts. The inclusion of work based experiences that have meaning and relevance for students with disabilities and allow them to demonstrate content based skills in a more concrete methodology is firmly aligned with both the regulatory and ethical constructs of exceptional education. We would be very supportive of partnering to establish clear and effective guidelines for this practice.</p>		

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**From:** Wanda Bibb [mailto:wbibb@hcps4.hanover.k12.va.us]  
**Sent:** Sunday, March 03, 2013 6:02 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Cc:** wbibb@hcps.us  
**Subject:** SPED Diplomas 2013-14 Forward



**Hanover County Public Schools**

PATRICK HENRY HIGH SCHOOL  
12449 W. PATRICK HENRY RD.  
ASHLAND, VA 23005

TELEPHONE (804) 365-8000  
FAX (804) 365-8001

Wanda Bibb  
Principal  
Patrick Henry High School

February 28, 2013

**TO:** Board of Education, Virginia Department of Education (VDOE)  
**CC:** Mr. John Eisenberg, VDOE Assistant Superintendent for Special Education & Student Services  
**FROM:** Wanda Bibb, Principal, Patrick Henry High School  
**RE:** Public Comment Regarding Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

I am writing in reference to proposed guidelines for Standard Diploma Credit Accommodations for Students with Disabilities. I fully understand and wholeheartedly agree with the premise of the proposed guidelines and am concerned with the misinformation that you may have received.

As an administrator of special education programs and as a professional advocate of students with disabilities, I ask that you adopt the proposed guidelines as submitted with regard to credit accommodations for students with disabilities to obtain a standard diploma. With the elimination of the Modified Standard Diploma option for students with disabilities, we are charged to develop a reasonable and fair pathway for students with disabilities to earn a Standard Diploma. The guidelines were developed with multiple input from a varied group of stakeholders to include parents of students with disabilities, school division educators, representatives from professional educational organizations and university education training programs as well as from citizens of the Commonwealth.

At the present time, school divisions offer students with disabilities either an Individualized Education Program (IEP) diploma, a Standard or Advanced Standard Diploma. Given the diversity of our students, this demands that we recognize the full range of ability levels within each educational disability and take into account for the vast array of unique learning needs of each and every student. In short, we must create a pathway for differentiated accountability that does not reduce or minimize expectations nor compromise the rigor of instruction. Anything short of this would

not only compromise the integrity of the Standard Diploma for all students, but sell short the ability and opportunity of students with disabilities to attainable post-secondary goals. The proposed guidelines provide such a conduit.

The proposed guidelines afford each student's IEP team the ability to adjust the student's program requirements to meet their unique learning needs. Some may view this as a diminished approach to a Standard Diploma. It is not. For those of us who continue to work with students with disabilities each day, we must make available differentiation to provide a reasonable and equitable path of success for them. The accommodations for verified credits as outlined in 8 VAC 20-131-50 provides such venue.

Finally, if public schools are to maintain the instructional rigor for students with disabilities with equity, then alternative accommodations must be provided. The Virginia Department of Education with input from a group of varied stakeholders has presented a balanced, fair and equitable means for students with disabilities to obtain a Standard Diploma. I urge you to adopt them

Thank you for your time and consideration.

Sincerely,

Wanda Bibb

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**From:** LAURA GOAD [mailto:lhgoad@ccpsd.k12.va.us]  
**Sent:** Tuesday, March 05, 2013 4:40 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Cc:** Eisenberg, John (DOE)  
**Subject:** SEAC public comment on credit accommodations

Hello Board Members - attached is a letter from our local special education advisory committee and a second page with additional signatures.

--

Laura C. Goad, Ed.D.  
Director of Special Education  
Carroll County Public Schools  
605-9 Pine Street  
Hillsville, VA 24343  
(276) 730-3211  
[lhgoad@ccpsd.k12.va.us](mailto:lhgoad@ccpsd.k12.va.us)

March 5, 2013

**TO:** Board of Education, Virginia Department of Education (VDOE)

**CC:** Mr. John Eisenberg, VDOE Assistant Superintendent for Special Education & Student Services

**FROM:** Special Education Advisory Committee, Carroll County Public Schools

**RE:** Public Comment Regarding Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

The Special Education Advisory Committee of Carroll County Public Schools met yesterday evening. At that time, the committee members present reviewed the proposed guidelines for Standard Diploma Credit Accommodations for Students with Disabilities. The committee members agree with the premise of the proposed guidelines.

The members present at the meeting of the Carroll County Special Education Advisory Committee ask that you adopt the proposed guidelines as submitted with regard to credit accommodations for students with disabilities to obtain a standard diploma. With the elimination of the Modified Standard Diploma option for students with disabilities, we are charged to develop a reasonable and fair pathway for students with disabilities to earn a Standard Diploma. The guidelines were developed with multiple input from a varied group of stakeholders to include parents of students with disabilities, school division educators, representatives from professional educational organizations and university education training programs as well as from citizens of the Commonwealth.

At the present time, school divisions offer students with disabilities either an Individualized Education Program (IEP) diploma, a Standard or Advanced Standard Diploma. Given the diversity of our students, this demands that we recognize the full range of ability levels within each educational disability and take into count for the vast array of unique learning needs of each and every student. In short, we must create a pathway for differentiated accountability that does not reduce or minimize expectations nor compromise the rigor of instruction. Anything short of this would not only compromise the integrity of the Standard Diploma for all students, but sell short the ability and opportunity of students with disabilities to attainable post-secondary goals. The proposed guidelines provide such a conduit.

The proposed guidelines afford each student's IEP team the ability to adjust the student's program requirements to meet their unique learning needs. If public schools are to maintain the instructional rigor for students with disabilities with equity, then alternative accommodations must be provided. The Virginia Department of Education with input from a group of varied stakeholders has presented a balanced, fair and equitable means for students with disabilities to obtain a Standard Diploma. We urge you to adopt them

Thank you for your time and consideration. Signatures of all members present on attached page.

Sincerely,

A handwritten signature in black ink that reads "Max Dean". The signature is written in a cursive, flowing style.

Max Dean, Chair

Carroll County Public Schools, Special Education Advisory Committee

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**From:** Kristin McLaughlin [mailto:kristin.mclaughlin@powhatan.k12.va.us]  
**Sent:** Friday, March 01, 2013 9:21 AM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Public Comment Regarding Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

Thank you for considering the attached.

*Kristin McLaughlin*

Assistant Superintendent for Special Education and Pupil Personnel Services  
Powhatan County Public Schools  
2320 Skaggs Road  
Powhatan, VA 23139  
804-598-5700  
804-598-5705(f)

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March 1, 2013

TO: Board of Education, Virginia Department of Education (VDOE)

CC: Mr. John Eisenberg, VDOE Assistant Superintendent for Special Education & Student Services

FROM: Kristin McLaughlin, Assistant Superintendent for Special Education and Pupil Personnel Services

RE: Public Comment Regarding Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

I am writing in reference to proposed guidelines for Standard Diploma Credit Accommodations for Students with Disabilities. I fully understand and wholeheartedly agree with the premise of the proposed guidelines and am concerned with the misinformation that you may have received.

As an administrator of special education programs and as a professional advocate of students with disabilities, I ask that you adopt the proposed guidelines as submitted with regard to credit accommodations for students with disabilities to obtain a standard diploma. With the elimination of the Modified Standard Diploma option for students with disabilities, we are charged to develop a reasonable and fair pathway for students with disabilities to earn a Standard Diploma. The guidelines were developed with multiple input from a varied group of stakeholders to include parents of students with disabilities, school division educators, representatives from professional educational organizations and university education training programs as well as from citizens of the Commonwealth.

At the present time, school divisions offer students with disabilities either an Individualized Education Program (IEP) diploma, a Standard or Advanced Standard Diploma. Given the diversity of our students, this demands that we recognize the full range of ability levels within each educational disability and take into count for the vast array of unique learning needs of each and every student. In short, we must create a pathway for differentiated accountability that does not reduce or minimize expectations nor compromise the rigor of instruction. Anything short of this would not only compromise the integrity of the Standard Diploma for all students, but sell short the ability and opportunity of students with disabilities to attainable post-secondary goals. The proposed guidelines provide such a conduit.

The proposed guidelines afford each student's IEP team the ability to adjust the student's program requirements to meet their unique learning needs. Some may view this as a diminished approach to a Standard Diploma. It is not. For those of us who continue to work with students with disabilities each day, we must make available differentiation to provide a reasonable and equitable path of success for them. The accommodations for verified credits as outlined in 8 VAC 20-131-50 provides such venue.

Finally, if public schools are to maintain the instructional rigor for students with disabilities with equity, then alternative accommodations must be provided. The Virginia Department of Education with input from a group of varied stakeholders has presented a balanced, fair and equitable means for students with disabilities to obtain a Standard Diploma. I urge you to adopt them.

Thank you for your time and consideration.

Sincerely,

*Kristin McLaughlin*

**From:** Martha Thompson [mailto:MThompson@hcps4.hanover.k12.va.us]  
**Sent:** Friday, March 01, 2013 10:30 AM  
**To:** DOE - Board of Education, rr (DOE)  
**Cc:** DOE - Assistant Superintendent of Special Education  
**Subject:** Diploma Credit Accommodations for Students with Disabilities

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I am writing in reference to proposed guidelines for Standard Diploma Credit Accommodations for Students with Disabilities. I fully understand and wholeheartedly agree with the premise of the proposed guidelines and am concerned with the misinformation that you may have received.

As an administrator of special education programs and as a professional advocate of students with disabilities, I ask that you adopt the proposed guidelines as submitted with regard to credit accommodations for students with disabilities to obtain a standard diploma. With the elimination of the Modified Standard Diploma option for students with disabilities, we are charged to develop a reasonable and fair pathway for students with disabilities to earn a Standard Diploma. The guidelines were developed with input from a varied group of stakeholders to include parents of students with disabilities, school division educators, representatives from professional educational organizations and university education training programs as well as from citizens of the Commonwealth.

At the present time, school divisions offer students with disabilities either an Individualized Education Program (IEP) diploma, a Standard or Advanced Standard Diploma. Given the diversity of our students, this demands that we recognize the full range of ability levels within each educational disability and take into count for the vast array of unique learning needs of each and every student. In short, we must create a pathway for differentiated accountability that does not reduce or minimize expectations nor compromise the rigor of instruction. Anything short of this would not only compromise the integrity of the Standard Diploma for all students, but sell short the ability and opportunity of students with disabilities to attainable post-secondary goals. The proposed guidelines provide such a conduit.

The proposed guidelines afford each student's IEP team the ability to adjust the student's program requirements to meet their unique learning needs. Some may view this as a diminished approach to a Standard Diploma. It is not. For those of us who continue to work with students with disabilities each day, we must make available differentiation to provide a reasonable and equitable path of success for them. The accommodations for verified credits as outlined in 8 VAC 20-131-50 provides such venue.

Finally, if public schools are to maintain the instructional rigor for students with disabilities with equity, then alternative accommodations must be provided. The Virginia Department of Education with input from a group of varied stakeholders has presented a balanced, fair and equitable means for students with disabilities to obtain a Standard Diploma. I urge you to adopt them

Thank you for your time and consideration.

Sincerely,

*Martha P. Thompson*

*Lead Teacher Specialist  
Special Education  
Hanover County Public Schools*

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**From:** Mary Anna Dunn [mailto:montiviola@embarqmail.com]  
**Sent:** Tuesday, February 26, 2013 2:50 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Standard Diploma

I applaud the efforts of the State Board of Education to create flexibility in the Standard Diploma, however any changes that have the potential to reduce the value of the diploma concern me. I have a teen-aged son with Asperger's Syndrome who is an honor role student. We were distressed to have to remove him from the advanced diploma track because the severity of his neurological condition makes him unable to learn foreign languages and understand complex mathematics. He is in advanced classes in all other subject areas, and it already breaks our hearts to have had to put him on this lower track because of his disability. I am extremely concerned about any changes to the standard diploma that could lower the value of that diploma. My bright son with autism ought to have more support, more flexibility, more accommodations in order to achieve at his true potential, not lower standards. I commend the staff at his school for doing all they can for our son, and they do, but they must work within guidelines that you have set for them and sometimes these guidelines do not support his achievement at the level he is capable of reaching. Please do all you can to make this situation better not worse. Students with autism have extraordinary challenges AND extraordinary potential.

Mary Anna Dunn  
Albemarle County

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**From:** Snell, Martha (mes5l) [mailto:mes5l@eservices.virginia.edu]  
**Sent:** Wednesday, February 27, 2013 11:03 AM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Revised comments on proposed guidelines for standard diploma credit accommodations

February 27, 2013

Dear Members of the Virginia Board of Education:

I take full responsibility for my hastily written note yesterday urging the Board of Education not to pass the proposed guidelines (8 VAC 20-131). My excuses for sending this brief, uninformed email are very flimsy (i.e., too little time and unquestioning trust in another's view without reading the proposed legislation for myself).

Upon reading the proposed legislation I am reversing my position and have the following comments about the proposed guideline:

- ? I certainly agree with (a) the elimination of the modified standard diploma, as it was too flexible and not regarded seriously, and (b) the need for guidelines to replace the emergency amendments of June, 2012.

- ? The characteristic (stated at the top of page 3 of the VBOE Agenda Item 1 summary, 2/28/13) is the *heart of the guidelines*; this characteristic is strength (“Credit accommodations allow students with disabilities different pathways and approaches to demonstrate mastery of the required content”). However the mechanics behind that statement constitute the solution to the problem of having diploma standards that are both meaningful and that incorporate accommodations for students with disabilities. It is this solution that school divisions, principals, teachers, parents, and students will need to understand and activate for individual students.
- ? The statement at the bottom of page 2 (attached document) is a laudable goal, but can this be promised simply with the creation of the Standard Diploma? (“A student who earns a Standard Diploma, with or without credit accommodations, will be prepared for successful transition to postsecondary education/training and a career.”) I don’t think so. Successful transition to adulthood must not simply be promised; we know that its preparation requires extensive planning, effort, and oversight.

Suggested revisions:

1. Make this latter statement be the **goal** of these proposed guidelines and identify it as the goal, rather than to imply it simply happens. (“A student who earns a Standard Diploma, with or without credit accommodations, will be prepared for successful transition to postsecondary education/training and a career.”)
2. Make available to school divisions and parents a **glossary of illustrations** (that is added to annually) for accomplishing the five credit accommodations listed in item 3 under #2: Requirements for a Standard Diploma. Additional methods for accomplishing credit accommodations are likely to be added to the glossary.
3. Establish a **team of qualified people** (parents and professionals) to communicate with school divisions and parents and to watch over the development and revision of this glossary so as to promote consistency in the application of these guidelines. This also might be done at the school division level, but having a central team will help unify geographic interpretations. The list of five credit accommodations in the guidelines provides IEP and 504 teams a starting place, but they will benefit greatly from having some criteria for sorting acceptable from unacceptable credit accommodations. Certainly these are not two rigid categories, and this concept will evolve as the guidelines are applied. However, all guidelines are simply words. Those trying daily to apply these guidelines to a huge variety of students will benefit from having more specific illustrations and a means for sharing real examples with an oversight team who will struggle to keep the guidelines on track to accomplishing their stated goal.

I apologize for sending confusing position statements and thereby reducing the time you have reserved for the work you have to do.

Martha E. Snell, Ph.D.  
Professor Emeritus  
University of Virginia  
Curry School of Education

**From:** Snell, Martha (mes5l) [mailto:mes5l@eservices.virginia.edu]  
**Sent:** Tuesday, February 26, 2013 3:58 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Proposed guidelines for standard diploma credit accommodations

**Dear Board of Education Members**

**I write to urge that you not approve the proposed Guidelines for Standard Diploma Credit Accommodations. It is important to provide both high expectations and a strong education for all students, including those with disabilities. Passage of these guidelines would be a step backwards in the progress we have made toward strengthening the public education provided to students with disabilities.**

**Martha E. Snell, Ph.D.  
Professor Emeritus  
Charlottesville Virginia**

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**From:** Steinkoenig, Pamela [mailto:psteinkoenig@cityschools.com]  
**Sent:** Friday, March 01, 2013 3:35 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Cc:** Melton, David G.  
**Subject:** Support for credit accommodations for SWD

Pls see the attached letter of support for the proposed credit accommodations for students with disabilities. Thank you.

Pamela Steinkoenig  
Director of Pupil Personnel Services  
Fredericksburg City Public Schools  
200 Gunnery Road  
Fredericksburg, VA 22401  
540 372-1127  
psteinkoenig@cityschools.com

**TO:** Board of Education, Virginia Department of Education (VDOE)  
**FROM:** Ms. Pamela Steinkoenig, Director of Pupil Personnel Services  
**RE:** Proposed credit accommodations for Students with Disabilities to obtain a Standard Diploma

As an administrator of special education programs and as a professional advocate of students with disabilities, I ask that you consider the proposed requests as submitted with regard to credit accommodations for students with disabilities to obtain a standard diploma. As you know, with the recent elimination of the Modified Standard Diploma option for students with disabilities, we have been charged to develop a reasonable and fair pathway for students with disabilities to earn a

Standard Diploma. The proposals made were developed with input by a varied group of stakeholders to include parents, educators, and representatives from higher education agencies, to name a few.

Given that we are left to offer only an IEP diploma versus a Standard or Advanced Standard Diploma, this has been a daunting task. It demands that we recognize the full range of ability levels of ALL types of educational disabilities coupled with the huge array of unique learning needs of each and every student with a disability. In short, we must create a pathway for differentiated accountability that does not reduce or minimize expectations nor compromise the rigor of instruction. Anything short of this would not only compromise the integrity of the Standard Diploma for *all* students, but has the potential to sell students with disabilities short of attainable post-secondary goals.

The proposed plan does just that by affording each student's Individualized Education Plan (IEP) team the ability to adjust the student's program requirements to meet their unique learning needs. Some may view this as a *watered down* approach to a Standard Diploma. For those of us who have been and continue to work with students with disabilities in the field each and every day, we must be afforded such latitude to pave a reasonable and equitable path of success for all of our students. This will need to include the accommodations for verified credits as outlined in 8 VAC 20-131-50.

Finally, if public schools are to maintain the instructional rigor and evaluate students with disabilities with equity, then alternative test formats and evaluations must be made available to all students with disabilities that meet the eligibility criteria (i.e., no participation percentage cap on participation).

Thank you for your time and consideration.

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**From:** Connie Lorentzen [mailto:connie.lorentzen@gmail.com]

**Sent:** Friday, March 01, 2013 3:38 PM

**To:** DOE - Board of Education, rr (DOE)

**Subject:** Re: Ask for your NO VOTE on Guidelines for Standard Diploma Credit Accommodations

Honorable members of the Board,

I urge you to vote NO, on the Guidelines for Standard Diploma Credit Accommodations.

A standard diploma must mean something... high expectations and a rigorous education should be provided for all students, including those who have disabilities. Students who learn differently... can learn and it is important to maintain high expectations so that districts will provide struggling students with the necessary interventions and support services to help all students reach their potential.

Connie Lorentzen  
3900 Adrienne Drive  
Alexandria, VA.

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**From:** Christy Evanko [<mailto:cdevanko@yahoo.com>]  
**Sent:** Tuesday, February 12, 2013 2:17 PM  
**To:** Eisenberg, John (DOE)  
**Subject:** Re: Draft Credit Accommodations for Standard Diploma - Please do not disseminate

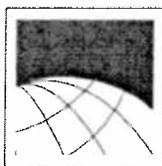
Thanks for your department's hard work on this! This looks great! One other item that we talked about at the SSEAC was to allow for the SOL to be taken on computer over multiple days (right now I guess that is just limited to the pencil version). That is the only thing I can think of that is missing. Perhaps take it in sections? I can't wait until we can share this information!

Best regards,  
Christy

Christy Evanko, BCBA  
Snowflakes ABA, LLC  
804-310-1128  
[christy@snowflakesaba.com](mailto:christy@snowflakesaba.com)

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# Prince William County

PUBLIC SCHOOLS

*Providing A World-Class Education*

**DATE:** February 22, 2013

**TO:** John Eisenberg, Assistant Superintendent, Division of Special Education and Student Services, Virginia Department of Education

**FROM:** Jane M. Lawson, Ed.D., Director of the Office of Special Education

**SUBJECT:** Preliminary Credit Accommodations Feedback from Prince William County Public Schools

The following are the concerns with the proposed accommodations:

1. The suggested locally awarded verified credits/flexibility could result in a situation very similar to that created when LEA could determine the age at which a child could be considered as Developmentally Delayed (DD).
    - For example, the student could be considered DD in Stafford County prior to the 2008 Regulations, but not in Prince William County Public Schools (PWCS).
    - With the extent of flexibility suggested, will a PWCS diploma be 'measured' against the diploma awarded by another LEA?
  2. How will additional substitute tests be approved and will this be at the VDOE level to ensure equal rigor between LEAs?
    - Would additional course options available only to students with disabilities (SWD) be perceived by non-disabled students and their parents as less rigorous and therefore devalued?
    - The same question would apply to colleges.
    - Would the courses be taught by a general educator in a core subject area? If so, would a special educator co-teach the class as the course is only for SWD?
    - Another suggestion, however, may be to consider developing multiple measures of performance as the basis for graduation. This could include not only state exit examinations, but also performance assessments and other indicators of student learning such as tying course grades to the state standards, or having performance based assessments.
  3. The expansion of eligibility for the Virginia Modified Achievement Standards Test (VMAST) could result in the same overuse as the VGLA. Would there be a cap on the number of students eligible?
  4. Will the above concerns depreciate the value of the Standard Diploma in Virginia? Or in order to avoid this will the 'Standard Diploma' become de facto, a two tier system? If this is the case then will IEP teams determine that the SWD will follow the 'standard' courses or the optional courses? In other words a Modified Standard Diploma much complicated by the extent of flexibility options to be added to those that already exist.
- c: Steven L. Walts, Superintendent of Schools  
Timothy L. Healey, Associate Superintendent for Student Learning and Accountability

Jane M. Lawson, Ed.D. Director  
*Office of Special Education*

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-----Original Message-----

From: Laura Lewis [mailto:chataldl@cox.net]  
Sent: Tuesday, February 26, 2013 4:52 PM  
To: DOE - Board of Education, rr (DOE)  
Subject: diploma options

Hi there!

I wanted to provide input on the diploma options for students with disabilities. I think there needs to be a system of universal accountability throughout the state. I do not think we should leave it up to individual counties to determine the standards. My son is on the autism spectrum and I think the sky is the limit for him. The higher we set the bar, the higher he achieves. Therefore, I want to make sure the standards are kept high for all students with disabilities and determined by a few individuals. Thank you.

Laura Lewis

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**From:** Mark Jones [mailto:mjones@kwcps.k12.va.us]  
**Sent:** Friday, February 15, 2013 3:52 PM  
**To:** McHale, Juanita (DOE)  
**Cc:** Stacy Johnson; Sheila Carr; Stanley Waskiewicz  
**Subject:** Ideas for Standard Diploma Credit Accommodations for SWDs Input for Dr. Wright

Mrs. McHale: Dr. Wright requested input regarding the ideas for Standard Diploma credit accommodations for students with disabilities. King William County suggests the following:

- 1) Expanding the eligibility for the VMAST,
- 2) Permitting divisions to award locally awarded verified credits in reading, writing and math for SWDs, and
- 3) Lowering the range of passing scores to 350 to 399 on any administration of the SOL test after taking the test at least twice.

There is great concern about graduation options for SWDs. We greatly appreciate the opportunity to provide input. Thank you. Mark Jones

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Mark R. Jones, Ed. D.  
Division Superintendent  
King William County Public Schools  
P.O. Box 185  
King William, VA 23086  
(804) 769-3434 x 510

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**From:** Kristin Morgan [mailto:kristinm1111@gmail.com]  
**Sent:** Tuesday, February 26, 2013 4:22 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** do not approve Guidelines for Standard Diploma

Board of Education:

As a resident of the City of Charlottesville, and a parent of three children in the local public school system, I ask that you do not approve the Guidelines for Standard Diploma Credit Accommodations. All students, including those who have disabilities, deserve high expectations and a rigorous education. It is in all of our interest to ensure that all students receive a high quality education.

Respectfully,

Kristin L. Morgan

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**From:** Diane Brown [mailto:dbrown@hcps4.hanover.k12.va.us]  
**Sent:** Wednesday, February 27, 2013 2:26 PM  
**To:** Hollins, Samantha (DOE)  
**Cc:** Diane Brown  
**Subject:** Credit Accommodations - Feedback from Region One

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Thank you for the information regarding the ideas for proposed credit accommodations for students with disabilities. Last Friday the Region One Special Education directors met and we had a good discussion on the topic. Overall, we are pleased with the credit accommodations that were suggested and feel that these will positively support our students in the goal of achieving a standard diploma. Thank you to VDOE for the work that went into developing these ideas. However, we want to provide you with some questions/comments from our group discussion:

- As it is not clear when these accommodations will be allowed for students; the special education directors from Region One strongly suggest the accommodations be allowed for students with disabilities who are currently in high school. The proposed accommodations may be the defining difference for positive effect for current students to achieve a standard diploma instead of the modified standard diploma. We feel these will not only be beneficial to the individual student but to the district and state as a whole to improve our standings with the federal graduation indicator. If not allowed, the special education directors have concerns that there will be complaints from families/parents as it will appear "unfair," especially to those families who may have students with disabilities in both 9<sup>th</sup> and 11<sup>th</sup> grades next year.

- The special education directors from Region One strongly encourage that the timeline for defining the credit accommodations be expedited to allow current students to benefit. If credit accommodations are decided upon before April AND allowed for current high school students, there may be some 12<sup>th</sup> grade students who may be able to achieve a standard diploma (instead of a modified) this school year.
- Will the Board of Education or VDOE be able to provide a list of the additional substitute tests to earn verified credit?
- Will the VSEP continue to be considered as non-0participation?

Thanks again for your communication with us. Please let us know if you should require any assistance that we might provide.

Diane K. Brown  
Hanover County Public Schools  
Director, Special Education  
[dbrown@hcps.us](mailto:dbrown@hcps.us)  
804-365-4535

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**From:** Cheryl Ward [mailto:[cward@endependence.org](mailto:cward@endependence.org)]  
**Sent:** Tuesday, February 26, 2013 5:06 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Public Comment for 2/28/13 BOE Meeting

Please accept this public comment on behalf of the Endependence Center regarding the proposed changes to Standard Diploma Credit Accommodations for Students with Disabilities.

The Endependence Center is concerned that the proposed changes to the diploma standards for students with disabilities can create the unintended effect of not only lowering expectations for these students but also lowering the fundamental standards a diploma represents.

This proposal creates a shift in standards that has the potential for local school systems to award diplomas to students that fail to meet proficiency standards. This “flexibility” can allow school systems an avenue to bypass the essential standards of diplomas. The Virginia Department of Education should maintain high levels of competence and integrity by upholding the same academic standards for all students when awarding diplomas. The Virginia Department of Education can do this by maintaining a continuum of oversight rather than allow variables and inconsistent standards to become the genesis for diplomas.

Students with disabilities are obligated to reach the same level of proficiency as other students in order to achieve the academic success represented by the standard or advanced diploma. And schools are obligated to provide a high quality academic program to assist students to achieve academic success.

Cheryl Ward

Educational Advocacy Coordinator  
Independence Center, Inc.  
6300 E. Virginia Beach Blvd.  
Norfolk, VA 23502-2827  
[cward@independence.org](mailto:cward@independence.org)  
757-351-1585  
757-461-5375 Fax

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-----Original Message-----

From: Joseph Patrick Anthony [mailto:[joseph@moonstar.com](mailto:joseph@moonstar.com)]  
Sent: Tuesday, February 26, 2013 6:13 PM  
To: DOE - Board of Education, rr (DOE)  
Subject: Guidelines for Standard Diploma Credit Accommodations

Dear BOE,

As a father of a high school graduate with Down syndrome, I have high expectations of my daughter, Alina. Schools must have high expectations, too. A great education should be provided for all students, including those with developmental disabilities. I urge you not to approve the Guidelines for Standard Diploma Credit Accommodations, as they could create lower, rather than higher, expectations of many students.

Sincerely,

Joseph Anthony

Joseph Patrick Anthony  
3977 Oak Hill Road  
Buckingham, VA 23921  
[www.JosephPatrickAnthony.com](http://www.JosephPatrickAnthony.com)  
[joseph@moonstar.com](mailto:joseph@moonstar.com)  
434-969-2014

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**From:** Carol Fleenor [mailto:[cfeenor@alleghany.k12.va.us](mailto:cfeenor@alleghany.k12.va.us)]  
**Sent:** Wednesday, February 27, 2013 4:04 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

Honored Board Members:

It is my understanding that the 2012 General Assembly's HB 1061 and SB 489, which amended §22.1-253.13:4 of the *Code of Virginia* required the Board of Education to "make provision in its regulations for students with disabilities to earn a standard diploma." It is my humble opinion that the intention is to maintain the spirit of IDEIA and provide a free and appropriate public education and equal opportunity to obtain a standard diploma to students with special needs. I believe that the emergency amendments to the Standards of Accreditation being proposed by John Eisenberg, Assistant Superintendent for Special Education and Student Services, will do just that. I ask that you please support these amendments.

The law already provides for parents of students identified as being eligible for special education services an avenue to reject IEP proposals if the parents (or students at age of majority) do not wish to take advantage of the accommodations for which the IEP team has the legal authority to determine them eligible. In my opinion, this nullifies the concerns of advocates and parents opposing the proposed credit accommodations to obtaining a standard diploma. If a parent or student does not want the accommodations, they do not have to accept them. But, you, the Board are bound by law to uphold the right to a free and appropriate public education and equal opportunity to obtain a Standard Diploma for all students who are special education eligible. Please do not allow the voices of those protesting to nullify the statutory rights of all special education students. Please support the accommodations being proposed by the Virginia Department of Education to allow special education students to achieve a Standard Diploma.

Sincerely,

**Carol F. Fleenor**

School Counselor

Clifton Middle School

Covington, VA 24426

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-----Original Message-----

**From:** Lindsay Gerber [mailto:lgerber@alleghany.k12.va.us]

**Sent:** Wednesday, February 27, 2013 4:06 PM

**To:** DOE - Board of Education, rr (DOE)

**Subject:** Please support the emergency amendments to the Standards of Accreditation

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**From:** Vaughn [mailto:vlauer1@verizon.net]

**Sent:** Tuesday, February 26, 2013 7:55 PM

**To:** DOE - Board of Education, rr (DOE)

**Subject:** Guidelines for Standard Diploma Credit Accommodations

To Members of the Board of Education

I have read the Guidelines for Standard Diploma Credit Accommodations and was dismayed. As I read this document, it allows LEAs to determine what constitutes a local diploma and standard diploma. This voids consistency of diploma meaning and value and will return students with disabilities to receipt of lower levels of programming due to lowering of expectations and standards. We have come too far to undervalue students with disabilities by stating that they will receive a substandard diploma based on substandard standards and a substandard education only so as to state that the special

education population is improving in achievement based on the number of students obtaining a diploma.

I already know that there are districts in the state that look at students with disabilities as a burden and who will welcome the opportunity to “look good” while providing a program that is far below the general education’s expectations. Once again, diplomas across the state will not be equal in value and more meaningless when these students attempt to enter a post high school educational program and then wonder what their diploma really means. Once again, parents will complain that their children’s diploma is useless because the skills their children have upon graduation will be insufficient to be successful in the general community on many levels.

Please do not allow this to happen. Please do not allow the leadership of the VADOE in the field of special education erode because the state has relinquished its responsibilities to the LEAs with respect to what a high school diploma means and to allow substandard programming to become the standard for students with disabilities. We have been there for decades and approval of this document will undo the progress made over the past 19 years.

Finally, the document indicates that the IEP team will be making the ultimate decisions. This is not fair to staff or parents who have over the course of but a few years, had to understand and apply NCLB and then changes by the current USDOE and now additional changes within this document. Asking IEP teams to develop IEPs under yet another set of standards is unfair. And, imagine, if you will, having a child with a disability and finding a need to move to a different district only to find that your child no longer qualifies for the promised diploma of the previous school district. Imagine how you would feel to have to explain to your child that “I’m sorry to have to tell you that this new school district will not allow you to obtain a diploma, because we moved, so that I could have a job.”

I encourage you not to approve these guidelines, but to maintain the responsibility with the VADOE to promote fairness and consistency and meaningfulness of our children’s school programs with the ultimate attainment of a meaningful diploma when it is legitimately earned.

Thank you for your time in reading this.

Sincerely,

Vaughn K. Lauer Ph.D.

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-----Original Message-----

From: Elizabeth Irvin [mailto:irvincita@gmail.com]  
Sent: Tuesday, February 26, 2013 7:59 PM  
To: DOE - Board of Education, rr (DOE)  
Subject: Please do not lower standards

... For children with IEPs

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**From:** Jessica McClung  
**Sent:** 2/15/13 01:19 PM  
**To:** [John.Eisenberg@doe.virginia.gov](mailto:John.Eisenberg@doe.virginia.gov)  
**Cc:** Lorraine Lange, Ben Williams  
**Subject:** Ideas for Standard Diploma Credit Accommodations for SWD

John,

Dr. Lange, Ben Williams/Asst. Director of testing, and I have discussed the possible options you presented to assist with credit accommodations for SWD. We are all in agreement that permitting local school divisions to award locally awarded verified credits in reading, writing, and math would be most helpful. In addition, we would like to be allowed to use parts I and II of certain required courses to earn a standard credit as well.

Thanks so much for seeking our input. Please feel free to contact me if I can be of further assistance.

*Jessica M. McClung*

Jessica M. McClung  
Director of Special Education & Pupil Personnel Services  
5937 Cove Rd. NW  
Roanoke, VA 24019  
(540) 562-3900 x10181  
(540) 562-3957 (fax)

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**From:** Laura Kaloi [mailto:LKaloi@ncld.org]  
**Sent:** Tuesday, February 26, 2013 11:40 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** maintain high standards for all students

Dear VA Board of Education:

I'm writing as a parent of three children attending VA public schools. One of my children, Ethan, age 12, has dyslexia and dysgraphia. I'm writing for Ethan and the thousands of students like him in our schools that deserve to be held to the same standards for teaching, learning and graduation with a regular diploma as all other students.

Please don't provide the level of flexibility for diploma options that is currently under consideration for local districts. Our commonwealth has developed rigorous standards for core curriculum and should ensure that every student is taught to achieve those standards. Also, studies conducted by the National Center on Educational Outcomes (NCEO) show that when too many diploma options are offered [by states], students who struggle, particularly those with disabilities will be disproportionately impacted and the result is too few receiving regular diplomas. And, the diploma they do receive is not worth the paper on which it is printed. These diplomas do not lead to meaningful career training or college.

Please consider the implications of the flexibility you are considering. If you truly wish to support the learning, outcomes and future education and employment of Virginia's children, please do not support flexibility in diploma options.

Sincerely,

*Laura W. Kaloi*  
*Oak Hill, VA 20171*

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**From:** DeDreama Harrod [mailto:धारrod@nkcp.s.k12.va.us]  
**Sent:** Wednesday, February 27, 2013 2:57 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Standard Diploma for all Students

To the members of the Board of Education:

I wanted to take this opportunity to express my interest in the *Proposed Guidelines for Standard Diploma Credit Accommodations for Students*. Students with disabilities face a lifetime of barriers to their education. Although we work diligently to level the playing field so to speak, we cannot completely remove all barriers. The increased rigor and expectations for these students has been needed and welcomed. They are no longer sitting in a classroom at the back of the school (not seen and not heard). We work hard to include them in every way possible. We acknowledge there is still work to do, but we are moving forward. However, the removal of the modified diploma option has the potential to take us backward. Please consider and accept the proposed guidelines as a starting point for improving graduation outcomes for all students. Without the credit accommodation, numerous students will be forced to obtain a special diploma. Instead of increasing the rigor, we are giving them permission to take a back seat and achieve minimal basic standards.

As a stakeholder in this decision, I am pleased with the proposed guidelines that were suggested and feel that these will positively support our students in the goal of

achieving a standard diploma. Thank you to VDOE for the work that went into developing these ideas.

In addition, I would like to ask that these options be available to all current high school students with disabilities as well.

Thank you for your continued support.

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DeDreama Harrod, Ed.S  
Director of Special Education  
New Kent County Public Schools

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**From:** asoroko@msn.com [mailto:asoroko@msn.com] **On Behalf Of** Alexander Soroko  
**Sent:** Wednesday, February 27, 2013 5:31 AM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Flexible Standard Diploma by School District

Dear BoE:

Objection:

Really? Each Commonwealth School District will be granted authority to set its own criteria for a standard diploma.  
Then, why would we need a BoE and Department of Education in Richmond.

Respectfully,  
Alex Soroko

Law Office of Alexander P. Soroko, Esq.  
1100 North Glebe Road, Suite 1010  
Arlington, Virginia 22201  
703.224.8044 703.625.2250  
703.224.8001 Fax  
ASoroko@SorokoLaw.com // [www.SorokoLaw.com](http://www.SorokoLaw.com)

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**From:** KEVIN DEHAVEN [mailto:krdehave@ccpsd.k12.va.us]  
**Sent:** Friday, March 01, 2013 9:16 AM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Credit Accommodations support

To whom it may concern:

I have attached a letter in support of the credit accommodations for students with disabilities starting in the 2013-2014 school year.

Thank you for your time in reading this letter.

Thank you,

--

Kevin DeHaven  
Special Education Teacher/Coordinator  
Carroll Co. High School  
100 CAVS LANE  
Hillsville, VA 24343  
Phone (276) 728-2125

Fax (276) 730-9932

March 1, 2013

TO: Board of Education, Virginia Department of Education (VDOE)

CC: Mr. John Eisenberg, VDOE Assistant Superintendent for Special  
Education & Student Services

FROM: Mr. Kevin DeHaven

RE: Public Comment Regarding Guidelines for Standard Diploma Credit  
Accommodations for Students with Disabilities

I am writing in reference to proposed guidelines for Standard Diploma Credit Accommodations for Students with Disabilities. I fully understand and wholeheartedly agree with the premise of the proposed guidelines and am concerned with the misinformation that you may have received.

As Special Education Department Chairperson and teacher of students with disabilities, I ask that you adopt the proposed guidelines as submitted with regard to credit accommodations for students with disabilities to obtain a standard diploma. With the elimination of the Modified Standard Diploma option for students with disabilities, we are charged to develop a reasonable and fair pathway for students with disabilities to earn a Standard Diploma. The guidelines were developed with multiple input from a varied group of stakeholders to include parents of students with disabilities, school division educators, representatives from professional educational organizations and university education training programs as well as from citizens of the Commonwealth.

At the present time, school divisions offer students with disabilities either an Individualized Education Program (IEP) diploma, a Standard or Advanced Standard Diploma. Given the diversity of our students, this demands that we recognize the full range of ability levels within each educational disability and take into count for the vast array of unique learning needs of each and every student. In short, we must create a pathway for differentiated accountability that does not reduce or minimize expectations nor compromise the rigor of instruction. Anything short of this would not only compromise the integrity of the Standard Diploma for all students, but sell

short the ability and opportunity of students with disabilities to attainable post-secondary goals. The proposed guidelines provide such a conduit.

The proposed guidelines afford each student's IEP team the ability to adjust the student's program requirements to meet their unique learning needs. Some may view this as a diminished approach to a Standard Diploma. It is not. For those of us who continue to work with students with disabilities each day, we must make available differentiation to provide a reasonable and equitable path of success for them. The accommodations for verified credits as outlined in 8 VAC 20-131-50 provides such venue.

Finally, if public schools are to maintain the instructional rigor for students with disabilities with equity, then alternative accommodations must be provided. The Virginia Department of Education with input from a group of varied stakeholders has presented a balanced, fair and equitable means for students with disabilities to obtain a Standard Diploma. I urge you to adopt them

Thank you for your time and consideration.

Sincerely,

Kevin DeHaven

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-----Original Message-----

From: McCormick, Patricia M CIV NSSA, C900 [mailto:patricia.mccormick@navy.mil]  
Sent: Wednesday, February 27, 2013 9:01 AM  
To: DOE - Board of Education, rr (DOE)  
Subject: success of students with disabilities

Alcon,

I am writing because I am interested in the success of my daughter and fellow students with disabilities. It is my understanding that this Thursday, the Virginia Board of Education will consider a new flexibility proposal that includes lowering expectations for students with IEPs.

The "Guidelines for Standard Diploma Credit Accommodations" attempt to make Standard Diplomas more achievable - a goal which we support - but the recommendations would result in local School Boards setting standards with NO consistency across the Commonwealth.

This lee-way given to local school systems could easily create a set of much lower expectations in some communities. My husband and I do not oppose flexibility, but it must have balance and accountability with state guidance.

The potential of thousands of students with disabilities has been overlooked for too long, and our children cannot afford to go backwards when they are meeting incredible achievements. They deserve the same opportunities as all children, a high quality education.

Overcoming daily challenges brings confidence, success and independence for the children.

Let's move with a challenge to continue with consistency, standards and goals setting high expectations of a high quality education for our children.

Lowering the bar for the requirements will only leave room for folks to accept lower achievement goals/success.

We are building our children's future for when we are no longer with them.

I want Danielle to have an opportunity to have an independent, quality adult life. Lowering my expectations would only add to her HANDICAP. I Building her Future with Strength. Establishing our children for their future.

No matter whether the students you care about are on track for a Standard Diploma, it's in all of our interest to ensure that all students receive a high quality education.

Patricia McCormick  
Parent  
757-609-1072

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**From:** SHARON SNOW [mailto:smsnow@ccpsd.k12.va.us]  
**Sent:** Friday, March 01, 2013 8:53 AM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

## CARROLL COUNTY PUBLIC SCHOOLS

605-9 Pine Street

Hillsville, Virginia 24343

TELEPHONE: (276) 728-3191

(276) 236-8145

FAX: (276) 728-3195

March 1, 2013

TO: Board of Education, Virginia Department of Education (VDOE)

CC: Mr. John Eisenberg, VDOE Assistant Superintendent for Special Education & Student Services

FROM: Sharon M. Snow  
Special Education Teacher, Woodlawn Middle School

RE: Public Comment Regarding Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

I am writing in reference to proposed guidelines for Standard Diploma Credit Accommodations for Students with Disabilities. I fully understand and wholeheartedly agree with the premise of the proposed guidelines and am concerned with the misinformation that you may have received.

As a teacher of students with disabilities, I ask that you adopt the proposed guidelines as submitted with regard to credit accommodations for students with disabilities to obtain a standard diploma. With the elimination of the Modified Standard Diploma option for students with disabilities, we are charged to develop a reasonable and fair pathway for students with disabilities to earn a Standard Diploma. The guidelines were developed with multiple input from a varied group of stakeholders to include parents of students with disabilities, school division educators, representatives from professional educational organizations and university education training programs as well as from citizens of the Commonwealth.

At the present time, school divisions offer students with disabilities either an Individualized Education Program (IEP) diploma, a Standard or Advanced Standard Diploma. Given the diversity of our students, this demands that we recognize the full range of ability levels within each educational disability and take into account for the vast array of unique learning needs of each and every student. In short, we must create a pathway for differentiated accountability that does not reduce or minimize expectations nor compromise the rigor of instruction. Anything short of this would not only compromise the integrity of the Standard Diploma for all students, but sell short the ability and opportunity of students with disabilities to attainable post-secondary goals. The proposed guidelines provide such a conduit.

The proposed guidelines afford each student's IEP team the ability to adjust the student's program requirements to meet their unique learning needs. Some may view this as a diminished approach to a Standard Diploma. It is not. For those of us who continue to work with students with disabilities each day, we must make available differentiation to provide a reasonable and equitable path of success for them. The

accommodations for verified credits as outlined in 8 VAC 20-131-50 provides such venue.

Finally, if public schools are to maintain the instructional rigor for students with disabilities with equity, then alternative accommodations must be provided. The Virginia Department of Education with input from a group of varied stakeholders has presented a balanced, fair and equitable means for students with disabilities to obtain a Standard Diploma. I urge you to adopt them.

Thank you for your time and consideration.

Sincerely,

Sharon M. Snow

--

Mrs. Sharon M. Snow  
Special Education Teacher, Language Arts  
Woodlawn Middle School  
745 Woodlawn Rd.  
Woodlawn, VA 24381  
(276) 728-3981

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**From:** Lucy Beadnell [mailto:lucy.beadnell@thearcofnova.org]  
**Sent:** Wednesday, February 27, 2013 9:27 AM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Guidelines for Standard Diploma Credit Accommodations

Board of Education,

I have worked with people with disabilities for many years as a group home manager, residential director, case manager, public guardian, and self-advocacy supporter. I've spent a great deal of time working with families who have school aged children and have seen first hand how rewarding it is for a student with a disability to earn a standard diploma. I urge you NOT to approve the Guidelines for Standard Diploma Credit Accommodations. I'm very concerned that the standards, as proposed, allow so much flexibility that there won't be consistency across the state on guidelines and expectations. Having working with families going through IEP battles, I know how often schools (even with the best of intentions) set the bar too low for students with disabilities and I fear the proposed changes would further this problem. I think flexibility is good to allow students to work towards a standard diploma despite challenges resulting in their disabilities, but all students deserve clear and consistent standards and supports.

Sincerely,  
Lucy Beadnell  
Director of Advocacy  
(703) 532-3214 x116  
(571) 641-3222 (Fax)

The "ARC" went out with the "R" word! We are The Arc of Northern Virginia and we invite you to join us today!

<http://new.thearcofnova.org/membership/>

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-----Original Message-----

From: Lisa Harrell [mailto:[lisa.harrell@nhrec.org](mailto:lisa.harrell@nhrec.org)]  
Sent: Wednesday, February 27, 2013 2:22 PM  
To: DOE - Board of Education, rr (DOE)  
Subject: proposed credit accommodations to obtain a standard diploma.

After reviewing the proposed credit accommodations to obtain a standard diploma I would like to express my support of this proposal. I work with students with emotional disabilities who struggle to meet all the requirements for a standard diploma, particularly the SOL requirements. Many of my students are highly motivated to graduate, but continue to struggle with passing SOL tests despite intervention and effort. I fear they may become more frustrated and at risk of dropping out as the new requirements take effect. Flexibility through the IEP process will allow my students to have a fair chance at graduating.

--

Lisa Harrell, School Psychologist  
Newport Academy  
New Horizons Regional Education Centers  
13400 Woodside Lane  
Newport News, Virginia 23608  
Phone: 757-874-4444 ext.5532  
FAX: 757-872-8951  
Email: [lisa.harrell@nhrec.org](mailto:lisa.harrell@nhrec.org)

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## CARROLL COUNTY PUBLIC SCHOOLS

605-9 Pine Street TELEPHONE: (276) 728-3191  
Hillsville, Virginia 24343 (276) 236-8145  
FAX: (276) 728-3195

March 1, 2013

TO: Board of Education, Virginia Department of Education (VDOE)  
CC: Mr. John Eisenberg, VDOE Assistant Superintendent for Special  
Education & Student Services  
FROM: Nancy Wilmoth

RE: Public Comment Regarding Guidelines for Standard Diploma Credit  
Accommodations for Students with Disabilities

I am writing in reference to proposed guidelines for Standard Diploma Credit Accommodations for  
Students

with Disabilities. I fully understand and wholeheartedly agree with the premise of the proposed guidelines

and am concerned with the misinformation that you may have received. As principal of a PreK-7th grade school who participates in meetings of students with disabilities, I ask that you adopt the proposed guidelines as submitted with regard to credit accommodations for students with disabilities to obtain a standard diploma. With the elimination of the Modified Standard Diploma option for students with disabilities, we are charged to develop a reasonable and fair pathway for students with disabilities to earn a Standard Diploma. The guidelines were developed with multiple input from a varied group of stakeholders to include parents of students with disabilities, school division educators, representatives from professional educational organizations and university education training programs as well as from citizens of the Commonwealth.

At the present time, school divisions offer students with disabilities either an Individualized Education Program (IEP) diploma, a Standard or Advanced Standard Diploma. Given the diversity of our students, this demands that we recognize the full range of ability levels within each educational disability and take into account for the vast array of unique learning needs of each and every student. In short, we must create a pathway for differentiated accountability that does not reduce or minimize expectations nor compromise the rigor of instruction. Anything short of this would not only compromise the integrity of the Standard Diploma for all students, but sell short the ability and opportunity of students with disabilities to attainable postsecondary goals. The proposed guidelines provide such a conduit.

The proposed guidelines afford each student's IEP team the ability to adjust the student's program requirements to meet their unique learning needs. Some may view this as a diminished approach to a Standard Diploma. It is not. For those of us who continue to work with students with disabilities each day, we must make available differentiation to provide a reasonable and equitable path of success for them. The

accommodations for verified credits as outlined in 8 VAC 20-131-50 provides such venue. Finally, if public schools are to maintain the instructional rigor for students with disabilities with equity, then alternative accommodations must be provided. The Virginia Department of Education with input from a group of varied stakeholders has presented a balanced, fair and equitable means for students with disabilities to obtain a Standard Diploma. I urge you to adopt them  
Sincerely,

Nancy F. Wilmoth

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**From:** Candace Cortiella [mailto:Candace@advocacyinstitute.org]  
**Sent:** Wednesday, February 27, 2013 10:39 AM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Comments on Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

Dear Virginia Board of Education Members:

I write to urge you to reject the proposed Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities coming before you at your February 28, 2013 meeting.

Efforts to improve the graduation rate of students with disabilities in Virginia are desperately needed. In fact, according to the 4-year adjusted cohort graduation rate (now required to calculate graduation rates in all states) 82 percent of Virginia students earn a regular diploma in

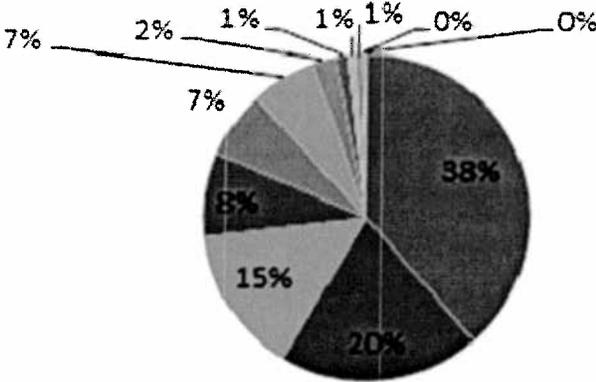
4 years, but only 47 percent of students with disabilities achieve that goal. This gap of 35 points is one of the highest in the country.

However, these guidelines will lower expectations for Virginia’s students with disabilities. Virginia has already taken steps to lower expectations for students with disabilities by formulating new Annual Measurable Objectives that require lower rates of proficiency in reading and math for these students than for other students in the Commonwealth. These guidelines would provide additional cover for schools, allowing credit requirements to be lowered in addition to the lower expectations for proficiency already in place.

As you can see from the chart below, more than 80 percent of Virginia’s students with disabilities do not have cognitive disabilities that might prevent them from achieving to the same standards expected of their non-disabled peers. Making this achievement possible is the role of special education.

## Virginia's Students with Disabilities

- Specific Learning Disabilities
- Autism
- Multiple Disabilities
- Orthopedic Impairments
- Other Health Impairments
- Intellectual Disabilities
- Developmental Delay
- Visual Impairments
- Speech/Language Impairr
- Emotional Disturbance
- Hearing Impairments
- Tramatic Brain Injury



These guidelines, which will encourage schools to lower expectations for students, will result in students with disabilities receiving standard diplomas who are NOT ready for a successful transition to postsecondary education/training and a career. **Clearly students with disabilities are not included in Virginia’s “College and Career Ready Initiative,” despite lots of rhetoric to the contrary.**

The Board of Education should direct the VDOE to reformulate these guidelines. Specifically, a revised proposal must:

- Not allow the use of any Virginia Modified Achievement Standards Test. Virginia’s ESEA waiver requires that the state discontinue use of these tests for accountability purposes. The US Dept. of Education has taken this step because it has determined that these alternate assessments do not provide a true picture of student performance. Therefore, to use this alternate assessment as a vehicle to earn a standard diploma is inappropriate. The VBOE should direct VDOE to discontinue ALL uses of the VMAST.
- Not allow local school divisions to award locally verified credits. This flexibility is sure to result in lowering of requirements to receive verified credits, beyond what the guidelines already provide!
- Not discriminate against poor students. Virginia’s students with disabilities are disproportionately low-income. According to information presented in Virginia’s ESEA Flexibility request (below), 48 percent of students with disabilities are economically disadvantaged versus 37 percent of all students. These students are also disproportionately minority.

**Percent of Students\* Who Are Economically Disadvantaged, By Subgroup**

All Students	Asian	Black	Hispanic	White	LEP	Students with Disabilities
37%	23%	61%	59%	23%	62%	48%

\*Some student may be counted in more than one subgroup.

- Provide equal opportunity to benefit. Section 504 and its implementing regulations prohibit discrimination and the denial of comparable aids, benefits, and services (34 C.F.R. § 104.4(b)(1)(i)-(iii)). In order for aids, benefits, and services to be “equally effective,” they must provide “an equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement” (34 C.F.R. § 104.4(b)(2)). All students who are served under IDEA are automatically protected under Section 504 (C.F.R. § 104.3(i)(2)(iii)). Thus, any guidelines designed to permit students with disabilities to have “credit accommodations” to earn a Standard Diploma must not incentivize discrimination.
- Allow only those accommodations that do not lower the standards. According to Virginia’s ESEA Flexibility application, “Students with disabilities in Virginia are expected to achieve the same standards as their non-disabled peers, through the Virginia *Standards of Learning*.”

Candace Cortiella  
 Director  
 The Advocacy Institute  
 Marshall, VA 20115  
 PH: 540.364.0051

**From:** Bright, Sara M. [mailto:brightsm@lcps.k12.va.us]  
**Sent:** Wednesday, February 27, 2013 11:46 AM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Credit accommodations

Dear Board members,

I strongly encourage adoption/approval of the proposal to allow credit accommodations as written. We in the local divisions are required by federal law and state code to provide the accommodations necessary for students with disabilities to obtain an appropriate education. Because each student 's individual learning style is different and because of the affect of the disability upon the learning of each student is different, it is impossible to hold these students to the same standards as students without disabilities. If the credit accommodations is not passed, I predict that Virginia will see a dramatic increase in the number of dropouts due to the inability to earn a standard diploma.

---

**From:** Elizabeth Germer [mailto:egermer@fccps.org]  
**Sent:** Wednesday, February 27, 2013 12:01 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Standard Diploma proposal

Dear Sir/Madame,

I am writing to voice my support of the Proposed Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities which is on the agenda for the board meeting tomorrow. As a Director of Special Education in a small city school system, we pride ourselves on the individual attention and support provided to students with disabilities to ensure 100% graduation rate. We have high expectations for all students. Our parents, staff, and administrators work together to develop IEPs and transition plans to help each student be college and/or career ready. Each year we have a few students who graduate with the modified diploma. The reduced credit requirements allow us to provide more career experiences and transition support. Without the ability to individually accommodate students for the standard diploma, these students would fail. They have often struggled in school and are our drop out risks. If we do not have the flexibility to develop individualized plans to build on success, we will lose these students. They will drop out either physically or mentally. Please support this plan so that we may support our students and the governor's goal that all students will be college and career ready.

Thank you for your attention to this important matter.

Sincerely,

Liz Germer

Director, Special Education and Student Services

Falls Church City Public Schools

703-248-5630

[egermer@fccps.org](mailto:egermer@fccps.org)

**From:** Armstrong, Nancy (VSDB)  
**Sent:** Wednesday, February 27, 2013 12:48 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Standard Diploma

For our deaf students the reading and writing SOLs are huge barriers. We do not see that these credit accommodations will solve this. We will follow the guidelines, of course.  
Nancy Armstrong, VSDB

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**From:** Serenity Smile [mailto:ssmile@amherst.k12.va.us]  
**Sent:** Wednesday, February 27, 2013 1:02 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Please support credit accomodations for students with disabilities to get a high school diploma

To whom it may concern,

I am writing to express my support for the proposed credit accommodations for students with disabilities in attaining a standard high school diploma. If these credit accommodations are not implemented, we could potential deny many of our students the ability to gain a standard diploma. This may affect their ability to go to college and the world of work.

Thank you,  
Serenity Smile  
Amherst, VA

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**From:** Linda Wise [mailto:lwise@amherst.k12.va.us]  
**Sent:** Wednesday, February 27, 2013 1:03 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

Please implement the credit accommodations to those students with disabilities! Without this many of my students could be denied the ability to earn a standard diploma!

Thank you for your consideration,

Linda Wise  
Monelison Middle School  
6th grade Math Teacher

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**From:** Sheila Carr [mailto:scarr@kwcps.k12.va.us]  
**Sent:** Wednesday, February 27, 2013 1:41 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Cc:** Eisenberg, John (DOE)  
**Subject:** Public Comment 2 28 13

Members of the Virginia Board of Education,

Please take the attached public comment into consideration when deliberating the topic of the proposed credit accommodations for students with disabilities to obtain a standard diploma.

Thank you for your time and consideration.

Sheila Carr

--  
Sheila R. Carr, Ed.D.  
Director of Special Programs  
King William County Public Schools  
Office: 804-769-3434 ext. 505  
Fax: 804-769-3312

Attached comments pasted below -

King William County Public Schools  
P.O. Box 185  
18548 King William Road  
King William, Virginia 23086

February 28, 2013

TO: Board of Education, Virginia Department of Education (VDOE)  
CC: Mr. John Eisenberg, VDOE Assistant Superintendent for Special Education & Student Services  
FROM: Dr. Sheila R. Carr, Director of Special Programs for King William County Public Schools  
RE: Proposed credit accommodations for Students with Disabilities to obtain a Standard Diploma

As an administrator of special education programs and as a professional advocate of students with disabilities, I ask that you consider the proposed requests as submitted with regard to credit accommodations for students with disabilities to obtain a standard diploma. As you know, with the recent elimination of the Modified Standard Diploma option for students with disabilities, we have been charged to develop a reasonable and fair pathway for students with disabilities to earn a Standard Diploma. The proposals made were developed with input by a varied group of stakeholders to include parents, educators, and representatives from higher education agencies, to name a few.

Given that we are left to offer only an IEP diploma versus a Standard or Advanced Standard Diploma, this has been a daunting task. It demands that we recognize the full range of ability levels of ALL types of educational disabilities coupled with the huge array of unique learning needs of each and every student with a disability. In short, we must create a pathway for differentiated accountability that does not reduce or minimize expectations nor compromise the rigor of instruction. Anything short of this would not only compromise the integrity of the Standard Diploma for *all* students, but sell students with disabilities short of attainable post-secondary goals.

The proposed plan does just that by affording each student's Individualized Education Plan (IEP) team the ability to adjust the student's program requirements to meet their unique learning needs. Some may view this as a *watered down* approach to a Standard Diploma. For those of us who have been and continue to work with students with disabilities in the field each and every day, we must be afforded such latitude to pave a reasonable and equitable path of success for all of our students. This will need to include the accommodations for verified credits as outlined in 8 VAC 20-131-50.

Finally, if public schools are to maintain the instructional rigor and evaluate students with disabilities with equity, then alternative test formats such as the VMAST must be made available to ALL students with disabilities that meet the eligibility criteria (i.e., no participation percentage cap on participation).

Thank you for your time and consideration.

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**From:** Elizabeth Heath [mailto:eh Heath@alleghany.k12.va.us]  
**Sent:** Wednesday, February 27, 2013 2:18 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

Honored Board Members:

It is my understanding that the 2012 General Assembly's HB 1061 and SB 489, which amended §22.1-253.13:4 of the *Code of Virginia* required the Board of Education to "make provision in its regulations for students with disabilities to earn a standard diploma." It is my humble opinion that the intention is to maintain the spirit of IDEIA and provide a free and appropriate public education and equal opportunity to obtain a standard diploma to students with special needs. I believe that the emergency amendments to the Standards of Accreditation being proposed by John Eisenberg, Assistant Superintendent for Special Education and Student Services, will do just that. I ask that you please support these amendments.

The law already provides for parents of students identified as being eligible for special education services an avenue to reject IEP proposals if the parents (or students at age of majority) do not wish to take advantage of the accommodations for which the IEP team has the legal authority to determine them eligible. In my opinion, this nullifies the concerns of advocates and parents opposing the proposed credit accommodations to obtaining a standard diploma. If a parent or student does not want the accommodations, they do not have to accept them. But, you, the Board are bound by law to uphold the right to a free and appropriate public education and equal opportunity to obtain a Standard Diploma for all students who are special education eligible. Please do not allow the voices of those protesting to nullify the statutory rights of all special education students. Please support the accommodations being proposed by the Virginia Department of Education to allow special education students to achieve a Standard Diploma.

Sincerely,

Elizabeth V. Heath, Ph. D.  
Director of Special Education  
Alleghany County Public Schools

PO Drawer 140  
100 Central Circle  
Low Moor, VA 24457  
Phone (540) 863-1809  
FAX (540) 863-1822

“The foundation of greatness is honoring the things of the present moment.” Eckhart Tolle

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**From:** Stinson, Anne [mailto:stinson.anne@nottowayschools.org]  
**Sent:** Wednesday, February 27, 2013 2:25 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Accommodations for Standard Diploma

Special needs students definitely need special consideration and accommodation in many cases to complete standard diploma requirements. Not allowing these considerations will result in many students being forced to accept a special diploma or even worse no diploma at all.

--  
Anne Stinson  
NHS Principal

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**From:** Carol Johnson [mailto:CJohnson@rappahannockschools.us]  
**Sent:** Wednesday, February 27, 2013 2:36 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Standard Diploma Credit Accommodations

Please accept the Superintendent of Public Instruction's recommendation the the Board of Education accept for first review the proposed Guidelines for Standard Diploma Credit Accommodation for Students with Disabilities.  
Thank You,

**Carol Johnson, Director of Instruction**  
**6 Schoolhouse Road**  
**Washington, VA 22747**  
**540-227-0259**

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**From:** Brenda Wallace [mailto:bwallace@alleghany.k12.va.us]  
**Sent:** Wednesday, February 27, 2013 2:32 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Standard Diploma

Honored Board Members:

It is my understanding that the 2012 General Assembly's HB 1061 and SB 489, which amended §22.1-253.13:4 of the *Code of Virginia* required the Board of Education to "make provision in its regulations for students with disabilities to earn a standard diploma." It is my humble opinion that the intention is to

maintain the spirit of IDEIA and provide a free and appropriate public education and equal opportunity to obtain a standard diploma to students with special needs. I believe that the emergency amendments to the Standards of Accreditation being proposed by John Eisenberg, Assistant Superintendent for Special Education and Student Services, will do just that. I ask that you please support these amendments.

The law already provides for parents of students identified as being eligible for special education services an avenue to reject IEP proposals if the parents (or students at age of majority) do not wish to take advantage of the accommodations for which the IEP team has the legal authority to determine them eligible. In my opinion, this nullifies the concerns of advocates and parents opposing the proposed credit accommodations to obtaining a standard diploma. If a parent or student does not want the accommodations, they do not have to accept them. But, you, the Board are bound by law to uphold the right to a free and appropriate public education and equal opportunity to obtain a Standard Diploma for all students who are special education eligible. Please do not allow the voices of those protesting to nullify the statutory rights of all special education students. Please support the accommodations being proposed by the Virginia Department of Education to allow special education students to achieve a Standard Diploma.

Sincerely,  
Brenda Wallace, MA CCC/SLP  
Speech Language Pathologist  
Alleghany County Public Schools

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**From:** Michele Harris [mailto:mharris@sussex.k12.va.us]  
**Sent:** Wednesday, February 27, 2013 2:41 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Item I - Proposed Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

To the members of the Board of Education:

I wanted to take this opportunity to express my interest in the *Proposed Guidelines for Standard Diploma Credit Accommodations for Students*. Students with disabilities face a lifetime of barriers to their education. Although we work diligently to level the playing field so to speak, we cannot completely remove all barriers. The increased rigor and expectations for these students has been needed and welcomed. They are no longer sitting in a classroom at the back of the school (not seen and not heard). We work hard to include them in every way possible. We acknowledge there is still work to do, but we are moving forward. However, the removal of the modified diploma option has the potential to take us backward. Please consider and accept the proposed guidelines as a starting point for improving graduation outcomes for all students. Without the credit accommodation, numerous students will be forced to obtain a special diploma. Instead of increasing the rigor, we are giving them permission to take a back seat and achieve minimal basic standards.

As a stakeholder in this decision, I am pleased with the proposed guidelines that were suggested and feel that these will positively support our students in the goal of achieving a standard diploma. Thank you to VDOE for the work that went into developing these ideas. In addition, I would like to ask that these options be available to all current high school students with disabilities as well. Thank you for your continued support.

**Michele Harris, Ed.S.**

Sussex County Public Schools  
Director of Special Education  
Post Office Box 1368  
21302 Sussex Drive  
Sussex, Virginia 23884  
434-246-6456

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-----Original Message-----

From: Wayne Crawford [mailto:wccrawford@alleghany.k12.va.us]  
Sent: Wednesday, February 27, 2013 2:53 PM  
To: DOE - Board of Education, rr (DOE)  
Subject:

Honored Board Members:

It is my understanding that the 2012 General Assembly's HB 1061 and SB 489, which amended §22.1-253.13:4 of the Code of Virginia required the Board of Education to "make provision in its regulations for students with disabilities to earn a standard diploma." It is my humble opinion that the intention is to maintain the spirit of IDEIA and provide a free and appropriate public education and equal opportunity to obtain a standard diploma to students with special needs. I believe that the emergency amendments to the Standards of Accreditation being proposed by John Eisenberg, Assistant Superintendent for Special Education and Student Services, will do just that. I ask that you please support these amendments.

The law already provides for parents of students identified as being eligible for special education services an avenue to reject IEP proposals if the parents (or students at age of majority) do not wish to take advantage of the accommodations for which the IEP team has the legal authority to determine them eligible. In my opinion, this nullifies the concerns of advocates and parents opposing the proposed credit accommodations to obtaining a standard diploma. If a parent or student does not want the accommodations, they do not have to accept them. But, you, the Board are bound by law to uphold the right to a free and appropriate public education and equal opportunity to obtain a Standard Diploma for all students who are special education eligible. Please do not allow the voices of those protesting to nullify the statutory rights of all special education students. Please support the accommodations being proposed by the Virginia Department of Education to allow special education students to achieve a Standard Diploma.

Sincerely,

Wayne A. Crawford  
Alleghany High School  
Covington, VA 24426

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-----Original Message-----

From: Edward Wheeler [mailto:ewheeler@alleghany.k12.va.us]  
Sent: Wednesday, February 27, 2013 3:14 PM  
To: DOE - Board of Education, rr (DOE)  
Cc: CMS -All  
Subject: Please support the emergency amendments to the Standards of Accreditation

Honored Board Members:

It is my understanding that the 2012 General Assembly's HB 1061 and SB 489, which amended §22.1-253.13:4 of the Code of Virginia required the Board of Education to "make provision in its regulations for students with disabilities to earn a standard diploma." It is my humble opinion that the intention is to maintain the spirit of IDEIA and provide a free and appropriate public education and equal opportunity to obtain a standard diploma to students with special needs. I believe that the emergency amendments to the Standards of Accreditation being proposed by John Eisenberg, Assistant Superintendent for Special Education and Student Services, will do just that. I ask that you please support these amendments.

The law already provides for parents of students identified as being eligible for special education services an avenue to reject IEP proposals if the parents (or students at age of majority) do not wish to take advantage of the accommodations for which the IEP team has the legal authority to determine them eligible. In my opinion, this nullifies the concerns of advocates and parents opposing the proposed credit accommodations to obtaining a standard diploma. If a parent or student does not want the accommodations, they do not have to accept them. But, you, the Board are bound by law to uphold the right to a free and appropriate public education and equal opportunity to obtain a Standard Diploma for all students who are special education eligible. Please do not allow the voices of those protesting to nullify the statutory rights of all special education students. Please support the accommodations being proposed by the Virginia Department of Education to allow special education students to achieve a Standard Diploma.

Sincerely,

Edward Wheeler

Special Education Teacher  
Clifton Middle School  
Alleghany County Public Schools

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**From:** Diane Brown [mailto:dbrown@hcps4.hanover.k12.va.us]  
**Sent:** Wednesday, February 27, 2013 3:28 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Credit Accommodations for Students with Disabilities

Dear Board Members,

I would like to take a moment of your time to inform you of a special educator's perspective on the *Proposed Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities* that you will be reviewing at this month's meeting. I have been in the special education field supporting students with disabilities for over 20 years. As a special educator, I appreciate the increased expectations for students with disabilities and the rigor of increased standards. The removal of the modified standard diploma & setting the expectation that all students should strive for a standard or advanced studies diploma is one way in which increased expectations can be realized. Students with disabilities can meet these increased expectations; however without accommodations for their identified disabilities, many of our students will not be able to graduate with a diploma status at all. Our students with disabilities who have dreams of career and post-secondary education goals will be forced to obtain a special diploma. The proposed credit accommodations submitted to the Board for consideration outline & retain high expectations for students with disabilities. I respectfully request that they be approved not only for the rising ninth grade class but for our students who are currently in high school. This will be a starting point for improving graduation outcomes for our students with disabilities.

I appreciate the work from the Virginia Department of Education to establish these proposed guidelines. I know that the team of educators solicited & encouraged input from a wide variety of stakeholders.

Thank you for your consideration of this item.

Sincerely,

Diane K. Brown  
Hanover County Public Schools  
Director, Special Education  
[dbrown@hcps.us](mailto:dbrown@hcps.us)  
804-365-4535

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From: Edward Wheeler  
Sent: Wed 2/27/2013 3:13 PM  
To: BOE@doe.virginia.gov  
Cc: CMS -All  
Subject: Please support the emergency amendments to the Standards of Accreditation

Honored Board Members:

It is my understanding that the 2012 General Assembly's HB 1061 and SB 489, which amended §22.1-253.13:4 of the Code of Virginia required the Board of Education to "make provision in its regulations for students with disabilities to earn a

standard diploma." It is my humble opinion that the intention is to maintain the spirit of IDEIA and provide a free and appropriate public education and equal opportunity to obtain a standard diploma to students with special needs. I believe that the emergency amendments to the Standards of Accreditation being proposed by John Eisenberg, Assistant Superintendent for Special Education and Student Services, will do just that. I ask that you please support these amendments.

The law already provides for parents of students identified as being eligible for special education services an avenue to reject IEP proposals if the parents (or students at age of majority) do not wish to take advantage of the accommodations for which the IEP team has the legal authority to determine them eligible. In my opinion, this nullifies the concerns of advocates and parents opposing the proposed credit accommodations to obtaining a standard diploma. If a parent or student does not want the accommodations, they do not have to accept them. But, you, the Board are bound by law to uphold the right to a free and appropriate public education and equal opportunity to obtain a Standard Diploma for all students who are special education eligible. Please do not allow the voices of those protesting to nullify the statutory rights of all special education students. Please support the accommodations being proposed by the Virginia Department of Education to allow special education students to achieve a Standard Diploma.

Sincerely,

Edward Wheeler

Special Education Teacher  
Clifton Middle School  
Alleghany County Public Schools

Lindsay A. Gerber

Special Education Teacher  
Clifton Middle School  
Alleghany County Public Schools

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**From:** courtney pugh [mailto:courtneypugh5439@gmail.com]  
**Sent:** Wednesday, February 27, 2013 4:10 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Standard Diplomas for Special Needs Children

To the Board of the Department of Education,

At the mother of two special needs children in the state of Virginia, it is discerning to me that our great state would consider their educational values less than their peers. The proposal you are considering on Thursday lowers the expectations of children like mine who have disabilities and are served under IEPs. While I support efforts to make Standard Diplomas more achievable by everyone, allowing the various districts to create their own standards would allow them to lower

the expectations of our children compared to their peers. Many districts already give substandard IEPs and services to our children, in effect watering down their educational experience and having lower expectations of them.

I urge you to consider putting in measures that make it a standard across the state so students in every district are treated in the same manner and are held to the same standards for their diplomas. IEPs and services are to help support our students to reach the same standards as their peers, not to treat them lower than their peers. Please use reasonable judgement on this matter as you prepare to discuss and vote on the proposal for Standard Diplomas.

Sincerely,

Courtney E. Pugh  
540-309-4009  
[courtneypugh5439@gmail.com](mailto:courtneypugh5439@gmail.com)

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**From:** Mary Stephenson [mailto:mstephenson@highland.k12.va.us]  
**Sent:** Wednesday, February 27, 2013 4:11 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Proposed Credit Accommodations

Members of the Board of Education:

You will be reviewing a proposal for credit accommodations that Students with Disabilities could access to help them earn a Standard Diploma. While most students with disabilities can earn a Standard Diploma without any accommodations there are many students with disabilities who are not able to do so. Since the General Assembly has eliminated the Modified Standard Diploma option for these students it is your job to see that these students are not relegated to be second class citizens with no recognized high school diploma. There are thousands of students who with some slight accommodations are very capable of earning a Standard Diploma but without accommodations might only be eligible for an IEP diploma. An IEP diploma option should only be for the smallest number of students.

As a school administrator I do not want to see graduation standards watered down, but I do want to see the playing field leveled so that all students are given an opportunity to participate. The proposed accommodations do not make it easier for students to earn a Standard Diploma only allow it to be a more reachable goal. These accommodations would not be used for all students with disabilities and guidelines should be developed for Individual Education Program (IEP) Teams to follow to ensure that students qualify to access these accommodations. IEP Teams are responsible groups of educators and parents who regularly develop rigorous goals for students with disabilities to meet, they want their students to reach higher expectations, but some students may need a step ladder to help them.

Most students with disabilities are only disabled in the school setting, they can function well in a job setting because they choose jobs where their disability is not a hindrance. However if those students don't get the opportunity to earn a Standard Diploma they might not be eligible for some jobs even though they have the ability to perform the job. We all need accommodations

for different tasks. Please give our students the opportunity to they deserve to be successful contributing members of our communities.

Thank you for your time and attention. The welfare of our students is in your hands.

Mary G. Stephenson  
Executive Director  
Highland County Schools  
PO Box 250  
Monterey, VA 24465  
540-468-6304  
FAX 540-468-6306

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**From:** Jim Gallagher [mailto:jgallagher@amherst.k12.va.us]  
**Sent:** Wednesday, February 27, 2013 4:11 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Cc:** Eisenberg, John (DOE); Jim Gallagher  
**Subject:** Support for Proposed Credit Accommodations for SWD related to attaining a Standard Diploma

February 27, 2013

TO: Board of Education, Virginia Department of Education (VDOE)

CC: Mr. John Eisenberg, VDOE Assistant Superintendent for Special

Education & Student Services

FROM: Jim Gallagher, Supervisor of Student Services  
Amherst County Public Schools

RE: Public Comment Regarding Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

I am writing in reference to proposed guidelines for Standard Diploma Credit Accommodations for Students with Disabilities. I fully understand and wholeheartedly agree with the premise of the proposed guidelines and am concerned with the misinformation that you may have received.

As an administrator of special education programs and as a professional advocate of students with disabilities, I ask that you adopt the proposed guidelines as submitted with regard to credit accommodations for students with disabilities to obtain a standard diploma. With the elimination of the Modified Standard Diploma option for students with disabilities, we are charged to develop a reasonable and fair pathway for students with disabilities to earn a Standard Diploma. The guidelines were developed with multiple input from a varied group of stakeholders to include parents of students with disabilities, school division educators, representatives from professional educational organizations and university education training programs as well as from citizens of the Commonwealth.

At the present time, school divisions offer students with disabilities either an Individualized Education Program (IEP) diploma, a Standard or Advanced Standard Diploma. Given the diversity of our students, this demands that we recognize the full range of ability levels within each educational disability and take into account for the vast array of unique learning needs of each and every student. In short, we must create a pathway for differentiated accountability that does not reduce or minimize expectations nor compromise the rigor of instruction. Anything short of this would not only compromise the integrity of the Standard Diploma for all students, but sell short the ability and opportunity of students with disabilities to attainable post-secondary goals. The proposed guidelines provide such a conduit.

The proposed guidelines afford each student's IEP team the ability to adjust the student's program requirements to meet their unique learning needs. Some may view this as a diminished approach to a Standard Diploma. It is not. For those of us who continue to work with students with disabilities each day, we must make available differentiation to provide a reasonable and equitable path of success for them. The accommodations for verified credits as outlined in 8 VAC 20-131-50 provides such venue.

Finally, if public schools are to maintain the instructional rigor for students with disabilities with equity, then alternative accommodations must be provided. The Virginia Department of Education with input from a group of varied stakeholders has presented a balanced, fair and equitable means for students with disabilities to obtain a Standard Diploma. I urge you to adopt them

Thank you for your time and consideration.

Sincerely,

Jim Gallagher  
Supervisor of Student Services  
Amherst County Public Schools  
President Elect, VCASE  
Ph: 434-946-9341  
Fax: 434-946-9346  
[jgallagher@amherst.k12.va.us](mailto:jgallagher@amherst.k12.va.us)

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**From:** Ryan, Kathy [mailto:kryan@cityschools.com]  
**Sent:** Wednesday, February 27, 2013 4:35 PM  
**To:** Eisenberg, John (DOE)  
**Subject:** diploma status

Mr. Eisenberg,  
Please ask the Board to reconsider how students with disabilities who normally we would consider for a modified may get verified credits as well as meet the more rigorous courses up to the individual localities. We know our students best; therefore, who best to make the appropriate decisions of how a student will obtain a standard diploma.

I am also hoping that the Board would consider the Math requirements for a Standard diploma. I believe in high expectations for all students; however, some students may never meet those requirements even with hard work. Please consider allowing students to get credit for Algebra and Geometry in parts and allowing Personal Finance to count for those students who may not be able to take Algebra II or III and pass to graduate.

Lastly, I would like to see the Board reconsider how special diplomas count toward graduation rates. We have ID students who graduate when they are 21 which is allowable by federal law. These students will graduate with a special diploma. We also have some students who do not meet the verified credit requirement for a standard diploma due to their disability and will graduate with a special diploma. Is it fair to not count these students as a high school graduate in our graduation rate? Currently, these students count against the schools even though these students are working to their potential.

---

**From:** Michael P Asip [mailto:Mike\_Asip@ccpsnet.net]  
**Sent:** Wednesday, February 27, 2013 5:00 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Cc:** Michael P Asip; Eisenberg, John (DOE)  
**Subject:** Public Comment Regarding Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities



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## CHESTERFIELD COUNTY PUBLIC SCHOOLS

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Marcus J. Newsome, Ed.D., Superintendent

February 27, 2013

Virginia Board of Education

RE: Public Comment Regarding Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

Dear Members of the Virginia Board of Education,

I am writing in reference to proposed guidelines for Standard Diploma Credit Accommodations for Students with Disabilities. I regret that I am not able to provide public comment directly at the Board meeting tomorrow. I fully understand and wholeheartedly agree with the premise of the proposed guidelines and am concerned with the misinformation that you may have received that challenges these guidelines.

As an administrator of special education programs and as a professional advocate of students with disabilities, I ask that you adopt the proposed guidelines as submitted with regard to credit accommodations for students with disabilities to obtain a standard diploma. With the elimination of the Modified Standard Diploma option for students with disabilities, we are charged to develop a reasonable and fair pathway for students with disabilities to earn a Standard Diploma. The guidelines were developed with multiple inputs from a varied group of stakeholders to include parents of students with disabilities, school division educators, representatives from professional educational organizations and university education training programs as well as from citizens of the Commonwealth.

At the present time, school divisions offer students with disabilities either an Individualized Education Program (IEP) diploma, a Standard or Advanced Standard Diploma. Given the diversity of our students, this demands that we recognize the full range of ability levels within each educational disability and take into count for the vast array of unique learning needs of each and every student. In short, we must create a pathway for differentiated accountability that does not reduce or minimize expectations nor compromise the rigor of instruction. Anything short of this would not only compromise the integrity of the Standard Diploma for all students, but sell short the ability and opportunity of students with disabilities to attainable post-secondary goals. The proposed guidelines provide such a conduit.

The proposed guidelines afford each student's IEP team the ability to adjust the student's program requirements to meet their unique learning needs. Some may view this as a diminished approach to a Standard Diploma. It is not. For those of us who continue to work with students with disabilities each day, we must make available differentiation to provide a reasonable and equitable path of success for them. The accommodations for verified credits as outlined in 8 VAC 20-131-50 provides such venue.

Finally, if public schools are to maintain the instructional rigor for students with disabilities with equity, then alternative accommodations must be provided. The Virginia Department of Education, with input from a group of varied stakeholders has presented a balanced, fair and equitable means for students with disabilities to obtain a Standard Diploma. I urge

you to adopt them and help provide a fair, yet rigorous path for our students to achieve a Standard Diploma!

Thank you for your time and consideration.

Sincerely,

Michael P. Asip, Ed.,D.  
Director, Exceptional Education, Chesterfield County Public Schools

CC: Mr. John Eisenberg, VDOE Assistant Superintendent for Special Education & Student Services

*Dr. Michael P. Asip*  
*Director of Exceptional Education*  
*Chesterfield County Public Schools*  
*Instruction Division Center*  
*600 Southlake Boulevard*  
*North Chesterfield, Virginia 23236*  
*804 594-1732*

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-----Original Message-----

From: Marlene Duke [mailto:mduke@southampton.k12.va.us]  
Sent: Wednesday, February 27, 2013 5:00 PM  
To: DOE - Board of Education, rr (DOE)  
Subject: Credit Accommodations

Please approve the credit accommodations for the standard diploma for students with disabilities.

Thank you.

Marlene Duke  
Director of Special Education

---

**From:** Kelley Calhoun [mailto:kelly.s.calhoun@gmail.com]  
**Sent:** Wednesday, February 27, 2013 5:07 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Standard Diploma

Dear Board Members,

I am a teacher and a parent of a special needs child. I was dismayed to learn you are considering not granting standard diplomas to children who have special needs and require the accommodations you have approved. Some children, like my daughter, have the ability to learn and accomplish great things. If she were to require additional assistance, does that negate her learning? Isn't that the purpose of a diploma? To show one has learned information and can use that information? Why limit her ability to attend college, should she have the ability and choose to go, by giving her a less than standard diploma?

There are many times, in my life, I have needed the assistance of others to truly learn a concept. In fact, in college, I required the assistance of a tutor for my Statistics class. After weekly tutoring, I managed to pass the class, but with a low 'C' for a grade. If the college followed your logic, they would have given me a lesser diploma because I required assistance to pass a class. It seems ludicrous I know, but what has been proposed is just as ludicrous. Our special needs kids already have a harder life, don't make their diplomas less meaningful. For many, it will be the only "standard" thing they ever receive.

Respectfully,  
Kelley Calhoun

---

-----Original Message-----

From: Tangelia Dressler [mailto:tdressler@alleghany.k12.va.us]  
Sent: Wednesday, February 27, 2013 5:39 PM  
To: DOE - Board of Education, rr (DOE)  
Subject: FW: Please support the emergency amendments to the Standards of Accreditation

-----Original Message-----

From: Edward Wheeler  
Sent: Wednesday, February 27, 2013 3:14 PM  
To: BOE@doe.virginia.gov  
Cc: CMS -All  
Subject: Please support the emergency amendments to the Standards of Accreditation

Honored Board Members:

It is my understanding that the 2012 General Assembly's HB 1061 and SB 489, which amended §22.1-253.13:4 of the Code of Virginia required the Board of Education to "make provision in its regulations for students with disabilities to earn a standard diploma." It is my humble opinion that the intention is to maintain the spirit of IDEIA and provide a free and appropriate public education and equal opportunity to obtain a standard diploma to students with special needs. I believe that the emergency amendments to the Standards of Accreditation being proposed by John Eisenberg, Assistant Superintendent for Special Education and

Student Services, will do just that. I ask that you please support these amendments.

The law already provides for parents of students identified as being eligible for special education services an avenue to reject IEP proposals if the parents (or students at age of majority) do not wish to take advantage of the accommodations for which the IEP team has the legal authority to determine them eligible. In my opinion, this nullifies the concerns of advocates and parents opposing the proposed credit accommodations to obtaining a standard diploma. If a parent or student does not want the accommodations, they do not have to accept them. But, you, the Board are bound by law to uphold the right to a free and appropriate public education and equal opportunity to obtain a Standard Diploma for all students who are special education eligible. Please do not allow the voices of those protesting to nullify the statutory rights of all special education students. Please support the accommodations being proposed by the Virginia Department of Education to allow special education students to achieve a Standard Diploma.

Sincerely,

Tangelia Dressler

Civics Teacher  
Clifton Middle School  
Alleghany County Public Schools

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**From:** Kathy Pierce [mailto:kpierce@amherst.k12.va.us]  
**Sent:** Wednesday, February 27, 2013 6:22 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

Good Evening,

The purpose of this message is to encourage the Board of Education to adopt the proposed guidelines for standard diploma credit accommodations for students with disabilities. Given the rigor and appropriate expectations within the Virginia Standards of Learning and the expectations for all students to achieve at high levels, and given the history of excellent, appropriate supports provided to Virginia's students with disabilities, I trust that the Board recognizes the need to balance high expectations with rigor by adopting the guidelines, as proposed.

Crucial elements in the guidelines that I would emphasize include the following.

Credit accommodations allow students with disabilities different pathways and approaches to demonstrating mastery of the required content.

The proposed guidelines were drafted with the assistance of multiple stakeholder groups including

parents, special educators, local administrators, special education advocacy groups, superintendents and members of the State Special Education Advisory Committee.

Impact on Fiscal and Human Resources:

The administrative impact required to develop these guidelines will be absorbed within existing resources.

Please weigh carefully the guidelines and adopt them as proposed.

Respectfully,  
Kathy Pierce

*Kathy Pierce*

Principal  
Central Elementary School  
Amherst, VA 24521  
(434) 946-9700

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**From:** Tina Smith [mailto:TJSMITH@co.charles-city.va.us]  
**Sent:** Wednesday, February 27, 2013 6:56 PM  
**To:** DOE - Board of Education, rr (DOE); Eisenberg, John (DOE)  
**Subject:** FW: Message from 50C-1

To Whom It May Concern:

Please find attached a letter that shows my support for the proposed guidelines for Standard Diploma Credit Accommodations for Students with Disabilities. I ask that you strongly consider the proposed guidelines as those that will greatly enhance the future educational opportunities for students with disabilities. Thank you for your consideration of my request.

Thank you,  
*Tina J. Smith*  
Director of Special Education  
Charles City County Public Schools  
(804) 652-4612

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-----Original Message-----

**From:** Lynn Martin [mailto:lmartin@amherst.k12.va.us]  
**Sent:** Wednesday, February 27, 2013 7:30 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Standard Diploma Credit Accommodations

To the VDOE,

As a special education teacher and an advocate for students with disabilities, I wholeheartedly agree with the proposed guidelines for the Standard Diploma Credit Accommodations for Students with Disabilities. These guidelines were developed by a varied group of citizen stakeholders including parents and educators. Students with disabilities have every right to a standard diploma. I urge you to adopt the proposed guidelines.

Lynn Martin/Madison Heights Elementary School

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**From:** Jane Quenneville [mailto:jane.quenneville@acps.k12.va.us]  
**Sent:** Wednesday, February 27, 2013 8:16 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Cc:** Eisenberg, John (DOE)  
**Subject:** Standard Diploma Credit Accommodations

Dear Virginia Board of Education,

As you consider the proposed guidelines for the Standard Diploma Credit Accommodations please read my letter of support.

Respectfully,

Jane M. Quenneville, Ed.D.  
Director of Special Education  
Alexandria City Public Schools  
2000 N. Beauregard Street, Suite 203  
Alexandria, Virginia 22311  
703-824-6650 (Phone)  
703-824-6741 (Fax)

February 27, 2013

TO: Board of Education, Virginia Department of Education (VDOE)

CC: Mr. John Eisenberg, VDOE Assistant Superintendent for Special Education & Student Services

FROM: Dr. Jane M. Quenneville, Director of Special Education

RE: Public Comment Regarding Guidelines for Standard Diploma  
Credit Accommodations for Students with Disabilities

As a member of the original stakeholder group who provided input to the proposed guidelines for the Standard Diploma Credit Accommodations I am writing to express my full support and agreement with the premise of the proposed guidelines and am concerned with the misinformation that you may have received.

As an administrator of special education programs and as a professional advocate of students with disabilities, I ask that you adopt the proposed guidelines as submitted with regard to credit accommodations for students with disabilities to obtain a standard diploma. With the elimination of the Modified Standard Diploma option for students with disabilities, we are charged to develop a reasonable and fair pathway for students with disabilities to earn a Standard Diploma. The guidelines were developed with input from a varied group of stakeholders to include parents of students with disabilities, school division educators, representatives from professional educational organizations and university education training programs as well as from citizens of the Commonwealth.

At the present time, school divisions offer students with disabilities either an Individualized Education Program (IEP) diploma, a Standard or Advanced Standard Diploma. Given the diversity of our students, this demands that we recognize the full range of ability levels within each educational disability and take into account for the vast array of unique learning needs of each and every student. In short, we must create a pathway for differentiated accountability that does not reduce or minimize expectations nor compromise the rigor of instruction. Anything short of this would not only compromise the integrity of the Standard Diploma for all students, but sell short the ability and opportunity of students with disabilities to attainable post-secondary goals. The proposed guidelines provide such a conduit.

The proposed guidelines afford each student's IEP team the ability to adjust the student's program requirements to meet their unique learning needs. Some may view this as a diminished approach to a Standard Diploma. It is not. For those of us who continue to work with students with disabilities each day, we must make available differentiation to provide a reasonable and equitable path of success for them. The accommodations for verified credits as outlined in 8 VAC 20-131-50 provides such venue.

Finally, if public schools are to maintain the instructional rigor for students with disabilities with equity, then alternative accommodations must be provided. The Virginia Department of Education with input from a group of varied stakeholders has presented a balanced, fair and equitable means for students with disabilities to obtain a Standard Diploma. I urge you to adopt them

Thank you for your time and consideration.

Sincerely,

Jane Quenneville, Ed.D.  
Director of Special Education  
Alexandria City Public Schools

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-----Original Message-----

From: Mike Ketron [mailto:mketron@bcps.k12.va.us]  
Sent: Wednesday, February 27, 2013 11:17 PM

To: DOE - Board of Education, rr (DOE)  
Cc: jbaker@bcps.k12.va.us  
Subject: Credit Accommodations for Students With Disabilities

Dear Sir or Madame,

As an educator for seventeen years I have seen quite a number of students walking across the stage during graduation ceremonies. Students of varying talents and abilities with even more dreams and aspirations. Many of those students desire to further their education in colleges and universities, others want to attend trade and technical schools while still some want to enter the workforce. These students have prepared themselves for their various futures by working and obtaining a high school diploma. Due to differences in individual abilities some had done so through the Modified Diploma which will no longer be available for the 2013-2014 rising freshman. I understand the reasoning behind removing the Modified Diploma but I fear that some students will fail to meet all requirements for a Standard Diploma, as they have in the past, without accommodations for their disabilities. I support credit accommodations for students with disabilities in order for them to achieve a Standard Diploma and to allow them to pursue their dreams and aspirations. I fear that without these accommodations we are closing doors of opportunity to students and restricting their ability to achieve full potential because of individual issues they may. For example, I see it as a disservice to students that due to an issue with writing skills they will not be able to achieve a Standard Diploma and receive an IEP Diploma, which would effect their employability as a welder, even if they were highly skilled and passed a Career and Technical Education credential test. As a conscientious educator I strive for all students to achieve their best. I also realize that some individuals, due to disabilities, struggle in certain areas and thrive in others. Requiring all students to meet all requirements without any accommodations will hurt students, not just on graduation day but throughout their lives.

Thank you,  
Mike Ketron  
Assistant Principal  
James River High School

Sent from my iPad

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**From:** Jamie Liban [mailto:jliban@thearcofva.org]  
**Sent:** Wednesday, February 27, 2013 11:35 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Cc:** hncullum@verizon.net  
**Subject:** Guidelines for Standard Diploma Credit Accommodations

DATE: February 27, 2013

TO: Virginia Board of Education (VBOE)

FROM: Jamie Liban, Executive Director, The Arc of Virginia

RE: Proposed "Guidelines for Standard Diploma Credit Accommodations"

To Whom It May Concern:

The Arc of Virginia is writing in regards to the proposed "Guidelines for Standard Diploma Credit Accommodations" that will be presented at the Virginia Board of Education meeting tomorrow. While we support the attempt to make Standard Diplomas more achievable, we do have some concerns about the proposal in its current form and its potential unintended consequences.

The Arc of Virginia is concerned that the proposed policy may result in lower educational standards for students with disabilities, which would be a major step back from Virginia's current public policy. We are also troubled by the policy that allows local School Boards to make accommodation decisions. We feel this would result in inconsistent application of educational standards across the Commonwealth, another issue that has the potential of being detrimental to students with disabilities.

Once again, we are supportive of the DOE's goal of making Standard Diplomas more achievable. We are not opposed to increasing flexibility, but it must be balanced with accountability and state guidance.

Thank you for your consideration of this matter.

Sincerely,

Jamie Liban  
Executive Director, The Arc of Virginia

CC: Howard Cullum, President, The Arc of Virginia

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**From:** VanDerwerker, Wyllys D. [mailto:vanderwerkerwd@lcsedu.net]  
**Sent:** Thursday, February 28, 2013 6:00 AM  
**To:** DOE - Board of Education, rr (DOE)  
**Cc:** Eisenberg, John (DOE)  
**Subject:** Public Comment Regarding Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

\*\*\*\*\* Lynchburg City Schools  
\*\*\*\*\* 915 Court Street - Lynchburg, VA 24505  
\*\*\*\*\* Mail Administrator - mail@lcsedu.net

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February 27, 2013

TO: Board of Education, Virginia Department of Education (VDOE)  
CC: Mr. John Eisenberg, VDOE Assistant Superintendent for Special Education & Student Services

FROM: Wyllys VanDerwerker, Director of Special Education, Lynchburg City Schools

RE: Public Comment Regarding Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

I am writing in reference to proposed guidelines for Standard Diploma Credit Accommodations for Students with Disabilities. I fully understand and wholeheartedly agree with the premise of the proposed guidelines.

As an administrator of special education programs, I ask that you adopt the proposed guidelines as submitted with regard to credit accommodations for students with disabilities to obtain a standard diploma. With the elimination of the Modified Standard Diploma option for students with disabilities, we are charged to develop a reasonable and fair pathway for students with disabilities to earn a Standard Diploma. The guidelines were developed with multiple input from a varied group of stakeholders to include parents of students with disabilities, school division educators, representatives from professional educational organizations and university education training programs as well as from citizens of the Commonwealth.

At the present time, school divisions offer students with disabilities either an Individualized Education Program (IEP) diploma, a Standard or Advanced Standard Diploma. Given the diversity of our students, this demands that we recognize the full range of ability levels within each educational disability and take into count for the vast array of unique learning needs of each and every student. In short, we must create a pathway for differentiated accountability that does not reduce or minimize expectations nor compromise the rigor of instruction. Anything short of this would not only compromise the integrity of the Standard Diploma for all students, but sell short the ability and opportunity of students with disabilities to attainable post-secondary goals. The proposed guidelines provide such a conduit.

The proposed guidelines afford each student's IEP team the ability to adjust the student's program requirements to meet their unique learning needs. This focus on the individual student should not be interpreted as a diminished approach to a Standard Diploma. For those of us who continue to work with students with disabilities each day, we must make available differentiation to provide a reasonable and equitable path of success for them. The accommodations for verified credits as outlined in 8 VAC 20-131-50 provides such venue.

Finally, if public schools are to maintain the instructional rigor for students with disabilities with equity, then alternative accommodations must be provided. The Virginia Department of Education with input from a group of varied stakeholders has presented a balanced, fair and equitable means for students with disabilities to obtain a Standard Diploma. I urge you to adopt them

Thank you for your time and consideration.

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**From:** Julie Baker [mailto:jbaker@bcps.k12.va.us]  
**Sent:** Thursday, February 28, 2013 6:55 AM  
**To:** DOE - Board of Education, rr (DOE)  
**Cc:** Eisenberg, John (DOE)  
**Subject:** Comments - Credit Accommodations

February 28, 2013

TO: Board of Education, Virginia Department of Education (VDOE)

CC: Mr. John Eisenberg, VDOE Assistant Superintendent for Special Education & Student Services

FROM: Julie A. Baker, Supervisor of Special Education Botetourt County Public Schools

RE: Public Comment Regarding Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

As an administrator of special education programs and as a professional advocate of students with disabilities, I ask that you adopt the proposed guidelines as submitted with regard to credit accommodations for students with disabilities to obtain a standard diploma. With the elimination of the Modified Standard Diploma option for students with disabilities, we are charged to develop a reasonable and fair pathway for students with disabilities to earn a Standard Diploma.

In short, we must create a system for differentiated accountability that does not reduce or minimize expectations nor compromise the rigor of instruction. The proposed credit accommodations provide students with disabilities an opportunity to participate in rigorous instructional opportunities while capitalizing on their strengths to work toward attainable post-secondary goals. The proposed guidelines afford each student's IEP team the ability to adjust each student's program requirements to meet his/her unique learning needs.

The Virginia Department of Education with input from a group of varied stakeholders has presented a balanced, fair and equitable means for students with disabilities to obtain a Standard Diploma. The guidelines were developed with multiple input from a varied group of stakeholders to include parents of students with disabilities, school division educators, representatives from professional educational organizations and university education training programs as well as from other citizens of the Commonwealth. I urge you to adopt them as written.

Thank you for your time and consideration.

Sincerely,

Julie A. Baker

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Julie A. Baker  
Supervisor of Special Education  
Botetourt County Public Schools  
143 Poor Farm Road  
Fincastle, VA 24090  
[jbaker@bcps.k12.va.us](mailto:jbaker@bcps.k12.va.us)  
(540) 473-8263-phone  
(540) 473-8298 -fax

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-----Original Message-----

From: Melody &quot;Mel&quot; C. [mailto:meowmel@yahoo.com]  
Sent: Thursday, February 28, 2013 4:33 PM  
To: DOE - Board of Education, rr (DOE)  
Subject: RE: Standard Diploma Changes for the Worse... 2.28.13 reply

Ms. Luchau,

I'm all for more children rewarded for hard work. However, please keep in mind that we want each and every student well prepared for life after high school. This includes possible college, trade school, military, and even directly to work. When we leave standards up to each local school system, it could well lead to more kids woefully unprepared for their future endeavors. We do not want to go backwards. What may feel good today, may back fire on ill prepared children tomorrow.

Thank you for the confirmation reply.

Sincerely,  
Melody Cartwright

-----Original Message-----

From: Melody &quot;Mel&quot; C. [mailto:meowmel@yahoo.com]  
Sent: Thursday, February 28, 2013 7:25 AM  
To: DOE - Board of Education, rr (DOE)  
Cc: meowmelly@gmail.com  
Subject: Standard Diploma Changes for the Worse... 2.28.13

The "Guidelines for Standard Diploma Credit Accommodations" attempt to make Standard Diplomas more achievable - a goal which we support - but the recommendations would result in local School Boards setting standards with no consistency across the Commonwealth. The lee-way given to local school systems could easily create a set of much lower expectations in some communities. We do not oppose flexibility, but it must be balanced with accountability and state guidance.

Please keep it even and fair.

Mother of Special Education Student at Martinsville High School

Melody Cartwright  
713 Jefferson Street  
Martinsville, VA 24112

276-732-8910 cell

meowmel@yahoo.com  
meowmel@comcast.net

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-----Original Message-----

From: James Ray [mailto:jray@russell.k12.va.us]  
Sent: Thursday, February 28, 2013 7:38 AM  
To: DOE - Board of Education, rr (DOE)  
Subject: Agenda item I

I have reviewed the proposed accommodations for obtaining a standard diploma to be reviewed today. In total I believe these are good accommodations and will help students with special needs in acquiring the needed credits for a standard diploma. As a teacher in Russell County Virginia, this item has my support.

Sent from my iPad

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Disclaimer: Electronic Mail regarding matters associated with a student enrolled in the Russell County Public Schools may be considered part of a child's educational record and subject to disclosure and retention as part of the child's educational record.

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**From:** LAURA GOAD [mailto:lhgoad@ccpsd.k12.va.us]  
**Sent:** Thursday, February 28, 2013 8:03 AM  
**To:** DOE - Board of Education, rr (DOE); Braunlich, Christian (DOE)  
**Cc:** Eisenberg, John (DOE)  
**Subject:** Public Comment Regarding Standard Diploma Credit Accommodations

Public Comment Attached - Scanned copy with signature and clearer original

--

Laura C. Goad, Ed.D.  
Director of Special Education  
Carroll County Public Schools  
605-9 Pine Street  
Hillsville, VA 24343  
(276) 730-3211  
[lhgoad@ccpsd.k12.va.us](mailto:lhgoad@ccpsd.k12.va.us)

## CARROLL COUNTY PUBLIC SCHOOLS

605-9 Pine Street  
Hillsville, Virginia 24343

TELEPHONE: (276) 728-3191  
(276)

236-8145

FAX: (276) 728-3195

February 28, 2013

TO: Board of Education, Virginia Department of Education (VDOE)

CC: Mr. John Eisenberg, VDOE Assistant Superintendent for Special Education & Student Services

FROM: Laura C. Goad, Director of Special Education, Carroll County Public Schools

RE: Public Comment Regarding Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

I am writing in reference to proposed guidelines for Standard Diploma Credit Accommodations for Students with Disabilities. I fully understand and wholeheartedly agree with the premise of the proposed guidelines and am concerned with the misinformation that you may have received.

As an administrator of special education programs and as a professional advocate of students with disabilities, I ask that you adopt the proposed guidelines as submitted with regard to credit accommodations for students with disabilities to obtain a standard diploma. With the elimination of the Modified Standard Diploma option for students with disabilities, we are charged to develop a reasonable and fair pathway for students with disabilities to earn a Standard Diploma. The guidelines were developed with multiple input from a varied group of stakeholders to include parents of students with disabilities, school division educators, representatives from professional educational organizations and university education training programs as well as from citizens of the Commonwealth.

At the present time, school divisions offer students with disabilities either an Individualized Education Program (IEP) diploma, a Standard or Advanced Standard Diploma. Given the diversity of our students, this demands that we recognize the full range of ability levels within each educational disability and take into count for the vast array of unique learning needs of each and every student. In short, we must create a pathway for differentiated accountability that does not reduce or minimize expectations nor compromise the rigor of instruction. Anything short of this would not only compromise the integrity of the Standard Diploma for all students, but sell short the ability and opportunity of students with disabilities to attainable post-secondary goals. The proposed guidelines provide such a conduit.

The proposed guidelines afford each student's IEP team the ability to adjust the student's program requirements to meet their unique learning needs. Some may view this as a diminished approach to a Standard Diploma. It is not. For those of us who continue to work with students with disabilities each day, we must make available differentiation to provide a reasonable and equitable path of success for them. The accommodations for verified credits as outlined in 8 VAC 20-131-50 provides such venue.

Finally, if public schools are to maintain the instructional rigor for students with disabilities with equity, then alternative accommodations must be provided. The Virginia Department of Education with input from a group of varied stakeholders has presented a balanced, fair and equitable means for students with disabilities to obtain a Standard Diploma. I urge you to adopt them

Thank you for your time and consideration.

Sincerely,

Laura C. Goad, Ed. D.

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## *Russell County Public Schools*

*Dr. Brenda F. Hess  
Division Superintendent  
Post Office Box 8  
84 Lorraine C. Turner Drive  
Lebanon, Virginia 24266*

Office # (276) 889-6500

FAX # (276) 889-6508

**School Board Members**

Chairman, Charlie Collins Vice-Chairman, Carl Jackson Linda Cross Linda Garrett Thomas Griffith Bob Hillman Fayrene Plaster

February 27, 2013

TO: Board of Education, Virginia Department of Education (VDOE)

CC: Mr. John Eisenberg, VDOE Assistant Superintendent for Special Education & Student Services

FROM:

RE: Public Comment Regarding Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

I am writing in reference to proposed guidelines for Standard Diploma Credit Accommodations for Students with Disabilities. I fully understand and wholeheartedly agree with the premise of the proposed guidelines and am concerned with the misinformation that you may have received.

As an administrator of secondary education programs and as a professional advocate of students with disabilities, I ask that you adopt the proposed guidelines as submitted with regard to credit accommodations for students with disabilities to obtain a standard diploma. With the elimination of the Modified Standard Diploma option for students with disabilities, we are charged to develop a reasonable and fair pathway for students with disabilities to earn a Standard Diploma. The guidelines were developed with multiple input from a varied group of stakeholders to include parents of students with disabilities, school division educators, representatives from professional educational organizations and university education training programs as well as from citizens of the Commonwealth.

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to provide a reasonable and equitable path of success for them. The accommodations for verified credits as outlined in 8 VAC 20-131-50 provides such venue.

Finally, if public schools are to maintain the instructional rigor for students with disabilities with equity, then alternative accommodations must be provided. The Virginia Department of Education with input from a group of varied stakeholders has presented a balanced, fair and equitable means for students with disabilities to obtain a Standard Diploma. I urge you to adopt them

Thank you for your time and consideration.

Sincerely,

Scotty Fletcher, Secondary Supervisor

Russell County Public Schools

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TO: Board of Education, Virginia Department of Education (VDOE)

CC: Mr. John Eisenberg, VDOE Assistant Superintendent for Special Education & Student Services

FROM: Steve Blevins, Director of Special Education, Smyth County Public Schools

RE: Public Comment Regarding Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

I am writing in reference to proposed guidelines for Standard Diploma Credit Accommodations for Students with Disabilities. I fully understand and wholeheartedly agree with the premise of the proposed guidelines and am concerned with the misinformation that you may have received.

As an administrator of special education programs and as a professional advocate of students with disabilities, I ask that you adopt the proposed guidelines as submitted with regard to credit accommodations for students with disabilities to obtain a standard diploma. With the elimination of the Modified Standard Diploma option for students with disabilities, we are charged to develop a reasonable and fair pathway for students with disabilities to earn a Standard Diploma. The guidelines were developed with multiple input from a varied group of stakeholders to include parents of students with disabilities, school division educators, representatives from professional educational organizations and university education training programs as well as from citizens of the Commonwealth.

At the present time, school divisions offer students with disabilities either an Individualized Education Program (IEP) diploma, a Standard or Advanced Standard Diploma. Given the diversity of our students, this demands that we recognize the full range of ability levels within each educational disability and take into account for the vast array of unique learning needs of each and every student. In short, we must create a pathway for differentiated accountability that does not reduce or minimize expectations nor compromise the rigor of instruction. Anything short of this would not only compromise the integrity of the Standard Diploma for all students, but sell short the ability and opportunity of students with disabilities to attainable post-secondary goals. The proposed guidelines provide such a conduit.

The proposed guidelines afford each student's IEP team the ability to adjust the student's program requirements to meet their unique learning needs. Some may view this as a diminished approach to a Standard Diploma. It is not.

For those of us who continue to work with students with disabilities each day, we must make available differentiation to provide a reasonable and equitable path of success for them. The accommodations for verified credits as outlined in 8 VAC 20-131-50 provides such venue.

Finally, if public schools are to maintain the instructional rigor for students with disabilities with equity, then alternative accommodations must be provided. The Virginia Department of Education with input from a group of varied stakeholders has presented a balanced, fair and equitable means for students with disabilities to obtain a Standard Diploma. I urge you to adopt them

Thank you for your time and consideration.

Sincerely,

Steve Blevins

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**From:** KAYLA GIBSON [mailto:kaylagib@gmail.com]  
**Sent:** Thursday, February 28, 2013 8:27 AM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Diploma

Dear Board Members,

I am mother to child with "Special Needs". I have seen the proposed changes which would make it difficult for children with special needs to obtain a standard diploma. I understand as a parent that we do not want to make our children reliant on special services always, but my problem with this proposal is that it is one size fits all. I don't see anything stated that separates the disabilities. Even a greater concern to me than that is the fact that even disabilities are not one size fits all. My son has Autism, my brother has Autism. They are on totally different ends of the Autism Spectrum , therefore their needs may be very different even though they have the same disability. I may choose to deny certain services for my son, but does that really make if fair that my mother may not be able to choose the services for my brother just because I don't feel like my son needs them? In my opinion it is not. Special needs services may already be denied, so why must we impose to remove services for those who may need them, because of the voices who already have that option. This would be like removing lettuce from a salad bar for someone who doesn't even eat salad! Logically this makes no sense. As a mother, I would encourage parents to read all of their children's right under the IDEA, which states that children are entitled to a free and appropriate education that is equal to that of peers, even with accommodations. Our children do have rights and parents as well as advocates alike need to uphold those rights whether or not they feel the need to utilize them. Thanks for your time, and I hope you make the right choice as a Board of Educators.

Kayla Gibson

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# Russell County Public Schools

Dr. Brenda F. Hess  
Division Superintendent  
Post Office Box 8  
84 Lorraine C. Turner Drive  
Lebanon, Virginia 24266

Office # (276) 889-6500

FAX # (276) 889-6508

## School Board Members

Chairman, Charlie Collins Vice-Chairman, Carl Jackson Linda Cross Linda Garrett Thomas Griffith Bob Hillman Fayrene Plaster

To: Board of Education, Virginia Department of Education (VDOE)

CC: Mr. John Eisenberg, VDOE Assistant Superintendent for Special Education & Student Services

FROM: Rita Street, Russell County Schools Elementary Supervisor

RE: Public Comment Regarding Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

I am writing in reference to proposed guidelines for Standard Diploma Credit Accommodations for Students with Disabilities. I fully understand and wholeheartedly agree with the premise of the proposed guidelines and am concerned with the misinformation that you may have received.

As an administrator of special education programs and as a professional advocate of students with disabilities, I ask that you adopt the proposed guidelines as submitted with regard to credit accommodations for students with disabilities to obtain a standard diploma. With the elimination of the Modified Standard Diploma option for students with disabilities, we are charged to develop a reasonable and fair pathway for students with disabilities to earn a Standard Diploma. The guidelines were developed with multiple input from a varied group of stakeholders to include parents of students with disabilities, school division educators, representatives from professional educational organizations and university education training programs as well as from citizens of the Commonwealth.

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The proposed guidelines afford each student's IEP team the ability to adjust the student's program requirements to meet their unique learning needs. Some may view this as a diminished approach to a Standard Diploma. It is not. For those of us who continue to work with students with disabilities each day, we must make available differentiation to provide a reasonable and equitable path of success for them. The accommodations for verified credits as outlined in 8 VAC 20-131-50 provides such venue.

Finally, if public schools are to maintain the instructional rigor for students with disabilities with equity, then alternative accommodations must be provided. The Virginia Department of Education with input from a group of varied stakeholders has presented a balanced, fair and equitable means for students with disabilities to obtain a Standard Diploma. I urge you to adopt them. Thank you for your time and consideration.

Sincerely,

Rita Street

TO: Board of Education, Virginia Department of Education (VDOE)

CC: Mr. John Eisenberg, VDOE Assistant Superintendent for Special Education & Student Services

FROM: Dr. Robert E. Widener, Jr.

RE: Public Comment Regarding Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

I am writing in reference to proposed guidelines for Standard Diploma Credit Accommodations for Students with Disabilities. I fully understand and wholeheartedly agree with the premise of the proposed guidelines and am concerned with the misinformation that you may have received.

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The proposed guidelines afford each student's IEP team the ability to adjust the student's program requirements to meet their unique learning needs. Some may view this as a diminished approach to a Standard Diploma. It is not. For those of us who continue to work with students with disabilities each day, we must make available differentiation to provide a reasonable and equitable path of success for them. The accommodations for verified credits as outlined in 8 VAC 20-131-50 provides such venue.

Finally, if public schools are to maintain the instructional rigor for students with disabilities with equity, then alternative accommodations must be provided. The Virginia Department of Education with input from a group of varied stakeholders has presented a balanced, fair and equitable means for students with disabilities to obtain a Standard Diploma. I urge you to adopt them

Thank you for your time and consideration.

Sincerely,

Robert E. Widener, Jr. Ed.D

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# Russell County Public Schools

Dr. Brenda F. Hess  
Division Superintendent  
Post Office Box 8  
84 Lorraine C. Turner Drive  
Lebanon, Virginia 24266

Office # (276) 889-6500

FAX # (276) 889-6508

## School Board Members

Chairman, Charlie Collins Vice-Chairman, Carl Jackson Linda Cross Linda Garrett Thomas Griffith Bob Hillman Fayrene Plaster

TO: Board of Education, Virginia Department of Education (VDOE)

CC: Mr. John Eisenberg, VDOE Assistant Superintendent for Special Education & Student Services

FROM: Angela Farmer  
Director of Special Education

DATE: February 27, 2013

RE: Public Comment Regarding Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

I am writing in reference to proposed guidelines for Standard Diploma Credit Accommodations for Students with Disabilities. I fully understand and wholeheartedly agree with the premise of the proposed guidelines and am concerned with the misinformation that you may have received.

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Thank you for your time and consideration.

Sincerely,

Angela Farmer

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**From:** Debbie Mooty [mailto:dmooty@bcps.k12.va.us]  
**Sent:** Thursday, February 28, 2013 9:14 AM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Support of Spec Ed Students

We identify students with disabilities. We test them. We give them services and special accommodations (according to the law -IDEA) and we help them achieve in class and ultimately, in life. What we can't do is always make them exactly like their peers; hence, the testing and the identifying! If they didn't have a disability we wouldn't need the testing and identifying but the bottom line is - they do. They struggle with testing and sometimes with classwork. They struggle because their perception of the world is different than the "normal" and they struggle DAILY to overcome their problems.

We are serving no one that I know of who would take away their right to be successful - to the best of their ability - and to graduate from high school with the necessary skills for vocational training, community college, college in general or work - only to be denied these opportunities because of a political decision regarding their diploma.

I wish politicians in general would consider that these are little human beings. These are kids that work daily to overcome what many of us take for granted - the ability to interpret our world and deal with it consistently. Our teachers and especially our special education teachers are often blamed for any failure of a student with disabilities, but the bottom line is most of them don't fail if they are not put to tasks that they simply cannot do often because they were born with the inability to do so!

We should never deny a student with a disability the same opportunities as everyone else - or is that just what we want everyone to believe is behind the spirit of IDEA?

I have always believed in this law. I think we need to support this law - fully!

DEBBIE MOOTY  
LORD BOTETOURT HIGH SCHOOL  
SPECIAL EDUCATION DEPARTMENT CHAIR

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Craig County Public Schools  
PO Box 245  
6 Alleghany Circle  
New Castle, VA 24127

February 27, 2013

TO: Board of Education, Virginia Department of Education (VDOE)

CC: Mr. John Eisenberg, VDOE Assistant Superintendent for Special Education & Student Services

FROM: Jen Martell, Director of Special Education

RE: Public Comment Regarding Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

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Thank you for your time and consideration.

Sincerely, Jen Martell

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**From:** Kathy Rhea [mailto:krhea@russell.k12.va.us]  
**Sent:** Thursday, February 28, 2013 9:51 AM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Standard Diploma for SPED

To whom it may concern:

I am in support of the SPED students being able to obtain a Standard Diploma. The proposal for Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities would benefit our students.

Thank you,

Kathy Rhea

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**From:** Joyce McElwaine [mailto:jmcelwaine@bcps.k12.va.us]  
**Sent:** Thursday, February 28, 2013 10:46 AM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** RE: Public Comment Regarding Guidelines for Standard Diploma Credit Accommodations for Students with Disabilities

Dear Board

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Thank you for your time and consideration.

Sincerely,

Joyce McElwaine

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Joyce McElwaine  
Special Education Teacher  
James River High School

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Culpeper County Public Schools

February 28, 2013

TO: Board of Education, Virginia Department of Education (VDOE)  
CC: Mr. John Eisenberg, VDOE Assistant Superintendent for Special  
Education & Student Services  
FROM: Angela Neely, Executive Director of Special Education  
RE: Public Comment Regarding Guidelines for Standard Diploma Credit Accommodations for  
Students with Disabilities

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Thank you for your time and consideration.

Sincerely,

Angela Neely

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**From:** Carol Marvin [mailto:cmarvin@staunton.k12.va.us]  
**Sent:** Thursday, February 28, 2013 11:48 AM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** Students with Disabilities Graduation Requirements

To whom it may concern:

I am a parent of a students with disabilities. I have also worked in secondary education for the past eleven years. I completely support the proposed credit accommodations for students to receive a standard diploma. Without these additional accommodations in place, it will have a huge negative impact in helping our students (and my son) to obtain the necessary tools to be successful in their post-secondary plans. Please consider these accommodations. The future of many Virginia kids needs this. Thank you.

Carol Marvin

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Carol Marvin, Ed.S., CTS  
School Counselor  
Genesis Alternative School  
Staunton, VA

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**From:** Tiffany Eimers [mailto:teimers@staunton.k12.va.us]  
**Sent:** Thursday, February 28, 2013 12:06 PM  
**To:** DOE - Board of Education, rr (DOE)  
**Subject:** credit accommodations

Please implement the credit accommodations so that high school students with disabilities will have a fair chance at entering college and the workplace.

Thank you for your time,  
Tiffany Eimers  
Special Education Teacher  
Staunton City Schools

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