



STUDY • INFORM • ENGAGE

MEMORANDUM

TO: Deanna Durrett, General Counsel, Kentucky Department of Education
FROM: Brigitte Blom Ramsey, Executive Director
DATE: November 27th, 2018
RE: Proposed Amendments to 704 KAR 3:305 – Kentucky's Minimum High School Graduation Requirements

We have reviewed and are providing comments on the Kentucky Board of Education's [proposed amendments](#) to 704 KAR 3:305 establishing the minimum requirements necessary for a student to receive a high school diploma.

As longstanding advocates of improving the quality of education and advancing the educational attainment of Kentucky's citizens, the Prichard Committee agrees that Kentucky is graduating too many young people without adequate skills necessary for their future success. With only 65% of Kentucky's 2017 high school graduates college and/or career ready, it is clear the Commonwealth must do more to ensure students have what they need to be successful in both work and postsecondary education. The Committee recognized as much in our 2005 report [High Achieving High Schools](#) noting that *too many students are getting out of high school without getting what they need out of high school.*

It is with this recognition that we commend the Board for bringing attention to the need for solutions that will indeed make high school more meaningful for all students and ensure that they are adequately prepared to transition to both work and postsecondary education.

However, based on a review of available research and because of the significant impact the proposed changes would have on Kentucky's students and schools, *we ask that the Board table all the amendments as proposed.* Further study of this issue is warranted, including hearing from the experience in other states, to ensure policymakers and stakeholders fully understand the costs and benefits of various approaches. More time is necessary to craft – collaboratively – a policy solution that is evidence-based, stands to improve the success of all students, and ensures:

- High expectations through rigorous course work and adequate supports.
- Greater access to early postsecondary opportunities, including relevant career pathways.
- A highly-qualified teacher in every classroom, every year.

The following summarize our key points of concern with the proposed amendments to 704 KAR 3:305.

Brigitte Blom Ramsey, *Executive Director* OFFICERS: William H. Wilson, *Chair* • Wynn L. Radford, III, *Vice Chair* • Carol Lamm, *Secretary/Treasurer*

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Minimum Competency Exit Exam Requirement

Section 4. of the [proposed regulation](#) details the phase-in of new graduation requirements including that, beginning with the class of 2024, students will have to meet minimum criteria on reading and mathematics assessments. The goal behind this element of the proposal seems simple enough: a high school diploma that is evidence of basic competence.

However, notwithstanding the fact that the proposal does not affirmatively state what this minimum standard would be, research indicates – as do shifts in other states' policies – that Kentucky should more carefully consider adopting such a change in requirements for high school graduation. The [proposed regulation](#) indicates 8th grade proficiency as the default standard by setting an appeal alternative at this standard level. Kentucky certainly does not want such a “floor” to become a new “ceiling” of student achievement.

[A meta-analysis](#) conducted by the University of Texas in 2010 summarized the findings of 46 studies on the effects of exit exams on student achievement, graduation, postsecondary outcomes and school response. The research found little to suggest that either minimum-competency exams or more rigorous standards-based exit exams positively impacted any of the studied outcomes. Summarizing the main takeaway, the researchers noted: *The evidence reviewed indicates that exit tests have produced few of the expected benefits and have been associated with costs for the most disadvantaged students.*

More specifically, the study found that exit exams were associated with higher dropout rates for lower-performing students, black males, minority students and students in high poverty areas while having unclear impacts on student achievement, employment, and earnings.

Similarly, [findings](#) from the Committee on Incentives and Test-Based Accountability in Public Education of the National Research Council in 2011 concluded that high school exit exams decrease the rate of high school graduation without improvements in student achievement as measured by low-stakes tests such as National Assessment of Education Progress (NAEP).

According to [a 2016 report](#) from the Education Commission of the States – for the graduating class of 2017 – only 15 states required students to pass exit exams to graduate from high school. Moreover, since 2011, 11 states have dropped exit exam requirements – including Tennessee.

Kentucky already knows which students are behind entering high school as evidenced by our 8th grade KPREP exam. Thus, the problem is not diagnostic, we know which students need more support. Schools need strategies that increase learning and minimum competency exams have not been proven to do that.

Based on these findings, we ask that the Board table the amendments as proposed. Further study of this issue is warranted, including hearing from the experience in other states, to ensure policymakers and stakeholders fully understand the costs and benefits of various approaches.

Transition Readiness Exit Requirement

Section 4. of the [proposed regulation](#) details the phase-in of new graduation requirements including that, beginning with the class of 2023, students will have to meet transition requirements of either academic or career readiness. The goal behind this element of the

proposal again seems simple enough: to align graduation requirements with the transition readiness indicators established in [703 KAR 5:270](#) – Kentucky's new accountability model developed pursuant to the federal Every Student Succeeds Act (ESSA) and state Senate Bill 1 of 2017.

The new accountability model establishes multiple measures by which a student can achieve either academic or career readiness. It is important to note, however, that the accountability model places the responsibility on the school to provide access to the necessary opportunities to achieve transition readiness. Placing this same responsibility on students is duplicative, but also raises potential equity and quality questions. It is unclear whether all students across the state have the same access to high-quality transition readiness opportunities and if some school districts may need additional support to ensure they have offerings necessary. Based on these equity and quality concerns, *we ask that the Board table the amendments as proposed. Implementing the accountability model as adopted should be a primary focus, including addressing any equity issues related to access to transition readiness opportunities.*

Removal of Algebra II as a Course Requirement

Section 4. of the [proposed regulation](#) details the phase-in of new graduation requirements including that, beginning with the class of 2023, students will have to meet revised course requirements. Course requirements under the proposal would be divided into ten (10) “foundational” credits and twelve (12) “personalized” credits.

Providing more opportunities for personalized pathways and flexibility in the curriculum may be an effective learning strategy, especially if rigorous standards are maintained. However, we have concerns with the removal of Algebra II as a foundational requirement in the absence of more discussion and guidance as to curricular alternatives that would meet Kentucky's academic standards in mathematics and ensure all students have access to high-level math opportunities.

Research indicates a strong relationship between mathematics achievement and student success. For example, a 2018 [transcript study](#) by the National Center for Education Statistics mapping patterns in high school math and science curricula found correlations between students taking high-level math and high-level science courses.

This same [study](#) reiterates previous findings by the National Center on Education Statistics, the National Bureau of Economic Research and the National Research Council that concluded students who take advanced mathematics courses in high school are more likely to enroll in college, are more likely to complete a bachelor's degree, have greater labor market returns and higher job satisfaction.

In 2006, when current requirements were adopted, the Kentucky Board of Education [discussed](#) the Algebra II requirement at length and included it based on the fact that there is a solid foundation of academic knowledge and skills in English/language arts and in mathematics that all students need, whether they choose to attend college or pursue training toward a career after high school. The decision of the Board then was influenced by an extensive study of higher education and employer entry-level expectations called the [American Diploma Project](#) – for which Kentucky was a founding state partner - led by Achieve, the Education Trust, and the Fordham Institute.

In the effort to ensure course requirements maintain alignment with state academic standards and to ensure all students have exposure to all state standards prior to graduation, we ask that the Board table the amendments as proposed. Removing Algebra II as a requirement is premature without a greater understanding by the Board of the math standards and what curricular alternatives are available to districts to meet the academic standards.

Authority of the Board of Education and Appropriateness of Proposed Changes

The Board of Education is clearly authorized to establish minimum high school graduation requirements in [KRS 156.160](#) as part of its administrative responsibilities. However, the magnitude of the changes being proposed to 703 KAR 3:305 substantially impact the philosophy of accountability established by the General Assembly in [KRS 158.6455](#) in which schools are held to consequence for failing to deliver to students, not individual students bearing the burden of inequities or lack of quality. In this sense, we ask that the Board table the amendments as proposed. More feedback on this issue is warranted, including from the General Assembly, to ensure policymakers and stakeholders fully understand the costs and benefits of various approaches. More time is necessary to craft – collaboratively – a policy solution that includes the necessary supports, professional development and investment necessary to ensure students meet expectations, are challenged with rigorous curricula, and afforded opportunities for excellence.

Conclusion

Kentucky vests significant responsibility in the Kentucky Board of Education and the Commissioner of Education to guide Kentucky's public education system. The weight of this responsibility requires the Board and the Commissioner to thoroughly research and analyze proposals for assurance that they will serve to move our state system of public education and Kentucky's students forward.

We agree that far too many of Kentucky's students are not getting what they need out of high school. We also commend the Board and the Commissioner for bringing attention to the need for solutions that will indeed make high school more meaningful for all students and ensure that they are adequately prepared to transition to both work and postsecondary education. However, substantial evidence indicates there may be significant unintended consequences with the proposed changes to 703 KAR 3:305 and we urge the Board to table the amendments and take additional time to learn from the research and other states, consider possible alternatives, and further engage with stakeholders. Effort and resources of our schools, at this time, must be focused on implementing the new accountability model established in Senate Bill 1 of 2017, closing achievement gaps, and ensuring all Kentucky students have:

- High expectations through rigorous course work and adequate supports.
- Greater access to early postsecondary opportunities, including relevant career pathways.
- A highly-qualified teacher in every classroom, every year.

Thank you for your consideration of our comments and feedback. Please let us know if you have any questions or need for additional information.