To: State Board of Education members and staff

From: ???

Date: ??

We strongly request reconsideration of the SBE proposed language regarding the career and technical education (CTE) graduation pathway. We believe the proposed rules do not reflect the intention of the statute, will weaken Washington’s investments in meaningful CTE programming, and will exacerbate inequalities in our education system. For far too long vocational education was seen as a less than for students, the current proposed rules will return CTE to those days. With all the work in our state to leverage CTE for all students to become successful contributing members of society, the economy and life, this will be a serious step back.

The proposed rules permit any two credits of CTE to qualify for this graduation pathway, allowing for a mix and match of CTE courses from across different CTE program areas (proposed rules WAC 180-51-230 (5)(h)). This means a student could combine a credit in cosmetology with a credit in welding and meet the requirement of this graduation pathway.

We believe this approach is in conflict with the intent of the legislation, which is to provide access to postsecondary training and education, careers, or apprenticeship through a “sequenced progression of multiple courses that are technically intensive and rigorous” (RCW 28A.700.030). Allowing unrelated and unaligned CTE courses does not meet the definition of “sequenced progression” currently in statute. Completing a credit of cosmetology and a credit of welding may “check the box” for graduation, but it undermines our state-side efforts in CTE and may not result in articulated access for students to employment and/or training after high school in a related field.

Washington State is a national leader in career and technical education. The changes anticipated in the proposed rules lowers the bar for CTE pathways, undermines the value of a strong CTE program and would make Washington state one of the least rigorous states when it comes to CTE education, particularly at a time when every state is engaged in federal Perkins accountability planning. Further, these rules will negatively impact the work being done through Career Connect Washington, the Work Integrated Learning Advisory Committee (WILAC) and public-private programming across the state.

Finally, we are significantly concerned that creating a low bar for CTE Graduation Pathways will exacerbate inequities for students of color, students with disabilities and students from low-income communities. We have seen time and again the least rigorous, least powerful pathways become the default for many of these students—and that must change. Our efforts in K-12 in our laws, rules, policies or practices should be geared toward maximizing postsecondary opportunities for ALL of Washington’s students.

We request you amend your draft rules to mirror the language in House Bill 1599 and the reference to RCW 28A.700.030. Specifically, we request you eliminate the language permitting mix and matching CTE courses and require the CTE courses to be a true sequenced progression. The amendatory language for this section of the proposed rules which would accomplish this goal is found on the following page(s) of this letter.
h) **Career and technical education course sequence.** Complete a sequence of career and technical education courses.

(i) For this subsection, "sequence" is defined as: Two or more high school credits of career and technical education courses in a **sequenced** progression tailored to the student's goals and relevant to the postsecondary pathway(s) outlined in the student's high school and beyond plan. A student's sequence of career and technical education courses to satisfy this pathway ((may))**must** be comprised of courses within the same career and technical education program area or courses within more than one career and technical education program area, as determined relevant by the student's high school and beyond plan in consultation with school personnel. A student's career and technical education course sequence ((may))**must** include courses leading to workforce entry, state or nationally approved apprenticeships, or postsecondary education.

(ii) Satisfying this pathway does not require a student to take any courses that are part of a career and technical education preparatory program as described in RCW 28A.700.030.

(iii) Each sequence of career and technical education courses must include at least one course that meets the requirements in (h)(i)(A) or (B) of this subsection:

(A) The minimum criteria identified in RCW 28A.700.030:

(I) Either:

• Lead to a certificate or credential that is state or nationally recognized by trades, industries, or other professional associations as necessary for employment or advancement in that field; or

• Allow students to earn dual credit for high school and college through tech prep, advanced placement, or other agreements or programs;
(II) Be comprised of a sequenced progression of multiple courses that are technically intensive and rigorous; and

(III) Lead to workforce entry, state or nationally approved apprenticeships, or postsecondary education in a related field.

(B) The curriculum requirements of core plus programs for aerospace, maritime, health care, information technology, or construction and manufacturing.

(iv) Satisfying this pathway does not require students to meet the separate English and mathematics graduation pathway requirements of pathway options (a) through (f) of this subsection.

(v) A course that is used to meet graduation pathway requirements may also be used to meet credit subject area requirements, including career and technical education course equivalencies per RCW 28A.700.070.