

1. 2113 – Federal and State Requirements:

- a. **CONFIRM APPROVAL:** Per committee: Kept all parts under the same section number; created subsections instead. Combined “groups” of items together as requested so it didn’t read as several dangling sentences that are each their own requirement.

2. Definitions Section

- a. **CONFIRM APPROVAL:** General policy: If it is defined in law; it has been removed.
 - i. Reason: Eliminates Risk that SBE has exceeded authority in defining terms.
 - ii. Exception: Define Secretary (and Agency and Board, see below) because context requires distinguishing.
 - iii. Guidance: If word truly needs to be defined to assist reader, recommend using definition passed by legislature.
- b. **CONFIRM APPROVAL:** General Policy: If it is not used in the rules, it has been removed.
- c. **CONFIRM APPROVAL:** General Policy If it has been inserted directly in the rules, it has been removed.
- d. **CONFIRM APPROVAL:** ADD: Agency, State Board of Education, (see above), and Independent School.
 - i. Reason: Defining Independent Schools removes need to write “Approved Independent School to which these rules apply” in each instance.
- e. **CONFIRM APPROVAL:** Minor Alterations to the following terms:
 - i. Discrimination – comply with current state and federal law
 - ii. Anti-Discriminatory and Anti-Racist – Kim these are changes you and I worked on. This eliminates the previous problem that the definitions didn’t “fit” as actual definitions when the words were used in the rule.
 - iii. “Equity” “Equitable” and “Inclusive” “Inclusion” – Kim these are changes you and I also worked on. This eliminates the previous problem that the definitions didn’t “fit” as actual definitions when the words were used in the rule. Note, I swapped the order of inclusive and inclusion to make it make sense.
 - iv. Ethnicity and Race – *DECISION POINT: RECOMMEND REMOVING.* However, proposed changes to mitigate misuse against intended goal of protection in law.
 - v. Evidence-Based – added reference to federal legal definition.

3. Learning Content Section (2120.5)

- a. **CONFIRM APPROVAL:**
 - i. Removed addition of “the arts” from (d) per committee discussion and response to commenter.
 - ii. Added description of core arts disciplines in (f) per committee discussion and response to commenter. Based on the “national arts standards” language approved by the State Board.
 - iii. Integrated definition of “transferable skills” to this section where it is already partly defined.
- b. **DECISION POINT:** Remove language re: physical education class requirements?

4. Curriculum Coordination (2120.6)

- a. **CONFIRM APPROVAL:** simplified first sentence per committee request (last meeting) so that it is directed at (a) – (f).
 - i. Note: Pre-k is mentioned here, but standards and approval are by Rule 2600. Language doesn’t have relevance other than to underscore.
- b. **CONFIRM APPROVAL:** remove “consistent with charge of Act 1”
 - i. Reason: there was not a charge in Act 1 that applies here.

5. Graduation Requirements (2120.7 & .8)

- a. **CONFIRM APPROVAL:** Removed duplicative 2120.8 and collapsed into one section
- b. **DECISION POINT:** I scrubbed language as best I can to remove reference to local. However, further research reveals that it is the *CURRENT PRACTICE* in the state that local school districts can and do set requirements for graduation (beyond meeting the final grade proficiencies set by SU/SD). An example is the requirement to complete a capstone or community service project. To remove this sentence (first paragraph of 2120.7) would be a change. It's one that the Board has the power to do, but it is not insignificant. (Note: I have not queried Lyle or Jenna regarding their experience with how this works currently in practice.)

6. School Leadership 2121.1

- a. **CONFIRM APPROVAL:** Reworded third paragraph to make clear that boards and school leaders are required to make inclusive and accessible process for gathering feedback AND they are required to develop and implement procedures to receive and respond to complaints about compliance with the rules.
 - i. Reason: The complaint/response process is referenced twice more in the rules, but it wasn't quite clear that you intend for there to be a requirement to establish a complaint process (and respond).

7. Staff 2121.2

- a. **CONFIRM APPROVAL:** In paragraph 2, changed to directive that instructional and administrative staff members have requisite knowledge and skills, etc. (Not "school must employ").
- b. **DECISION POINT:** Made decisions on whether to remove size requirements re:
 - i. Full-time principal (e.g. 10+ FTE Teachers)
 - ii. General class size/ class role of a teacher
 - iii. Library media specialist
 - iv. School counselor student load (in 2121.5)
 - v. School nurse load size (in 2121.5)

8. Instructional Materials (2121.2)

- a. **CONFIRM APPROVAL:** Added language per committee in response to comment received re: instructional materials needing to be more inclusive.

9. Disaggregating Data (2124.2)

- a. **CONFIRM APPROVAL:** clarify that Sec is to make available data received from independent schools.

10. Filing the CIP (2126.1)

- a. **CONFIRM APPROVAL:** Per committee conversation, bullet out what is included with the plan (a) – (d)

11. DECISION POINT: Recommend putting SOP first, then definitions, then the rest of the rules.

- a. Reason: Aligns with standard order of rules; important for use and in legal interpretation/analysis.

12. DECISION POINT: Take out or leave in 2 times when the rule says "Implementation and support by the Agency will be determined by the Secretary."