



February 16, 2023

Dr. Christina Grant
State Superintendent of Education
Office of the State Superintendent of Education
1050 First Street NE
Washington, DC 20002

Dear Superintendent Grant,

The D.C. State Board of Education (State Board) appreciates the work that the Office of State Superintendent of Education (OSSE) has dedicated to fulfilling the requirements of [D.C. Law 24-92, *Expanding Student Access to Period Products Act of 2022*](#). Pursuant to [§ 38-2652\(a\)\(2\)](#), the State Board has approval authority over statewide academic standards recommended by OSSE. The State Board would like to take this opportunity to suggest revisions to the supplemental menstrual health standards that are needed prior to our approval. Although the knowledge behind the proposed standards aligns with the mandated content and the overall vision of the law, the language within some standards needs to be changed to comply with all requirements of the *Expanding Student Access to Period Products Act of 2022* and to be more functional for educators and school-based leaders.

Standards Should Explicitly Discuss Menopause

The *Expanding Student Access to Period Products Act of 2022* references specific concepts that must be included in the menstrual health education standards.¹ All concepts are mentioned explicitly in at least one standard except menopause. The State Board recognizes that menopause could be covered under Strand 1 of the 6–8 Grade Band, “*examine factors that contribute to changes in the menstrual cycle including, but not limited to, age, diet, physical activity, stress, birth control, alcohol and tobacco use;*” however, since it is a legal requirement that menopause be included, we advise that OSSE amend this standard to explicitly reference menopause and/or add an additional stand-alone standard about menopause.

Standards Should Apply to Both Menstruators and Non-Menstruators

During the January 17 Working Session, the State Board expressed concerns with language in the supplemental menstrual health education standards, such that several of them could only be met if a student menstruates. Since the *Expanding Student Access to Period Products Act of 2022* mandates these new standards be “designed for all students, regardless of gender, in DCPS [DC Public Schools] schools and District of Columbia public charter schools, beginning in grade 4,” the State Board recommends that the addendum be reviewed with an eye to ensuring all the standards are achievable for menstruators and non-menstruators alike. For example:²

¹ <https://code.dccouncil.gov/us/dc/council/code/sections/38-531.03>

² The recommendations in this comment letter apply to more standards than are given as examples. Please review all standards with attention to these issues. A more comprehensive list can be provided, if needed.





- Strand 5 in the 6–8 Grade Band which asks students to “*understand what menstrual products should be used depending on their own preferences and goals.*”
- Strand 6 in the 9–12 Grade Band which asks students to “*design a personal health goal for maintaining menstrual health independently, analyze how family, peers, and healthcare providers might support or hinder its achievement, and evaluate progress toward its achievement.*”

Standards Should Be Demonstrable Within the Classroom

Each standard should be written in such a way that students will demonstrate their mastery within a classroom setting. As written, some standards ask students to use skills in their everyday lives that would be beyond teachers’ ability to assess. Although, for example, it is important for students to use effective communication skills with parents, guardians, healthcare professionals, and other trusted adults, teachers would have no way of assessing whether students were actually doing so. How would a teacher know whether a student was using effective communication skills to discuss menstruation with their doctor? The standards, instead, should focus on the skills or knowledge students will need to acquire inside the classroom in order to enable and promote that healthy behavior outside of school. In this scenario, maybe the standard would have students explain different communication strategies, or maybe it would have students evaluate when menstruators should seek out the support of one of these trusted adults. By focusing on the underlying content students should learn, the standards become more usable for educators and curriculum writers. For example:

- Strand 7 in the 3–5 Grade Band which asks students to “*demonstrate healthy ways to cope with physical and emotional changes that occur in response to menarche and during menstruation.*”
- Strand 4 in the 6–8 Grade Band which asks students to “*use effective communication skills to communicate changes in menstruation cycle with parents, guardians, healthcare professional, or another trusted*”

Standards Should Be Measurable

The State Board also asks OSSE to ensure the knowledge and skills demanded by the supplemental menstrual health standards are measurable. The verbs used in some standards concern the action students will take during a lesson rather than the skills or content knowledge students will acquire. For teachers to plan, instruct, and assess their students, the standards need to be outcome-oriented. Consider, when assessing how students “explore” or “examine” a topic, what skill or level of knowledge should they be able to demonstrate? For example:

- Strand 5 in the 3–5 Grade Band which asks students to “*explore how to manage their period and period challenges while in class and/or participating in extracurricular activities.*”
- Strand 1 in the 6–8 Grade Band which asks students to “*examine the causes and symptoms of premenstrual syndrome (PMS) and explore remedies to manage and reduce discomfort.*”





Standards Should Build More Advanced Knowledge and Skills Over Time

The standards that address similar topics across grade bands should work together to support students in developing a deeper and more nuanced understanding over time. Currently, some of the connected standards between the 3–5 and 6–8 Grade Bands and between the 6–8 and 9–12 Grade Bands are nearly identical and do not add additional demands onto older students. If no new knowledge or skill is being required in an older grade, then including the standard a second time is unnecessary because that content was already taught. The State Board recommends OSSE refine the vertical alignment of the supplemental menstrual health standards to help students sharpen their knowledge and skills over time and to reduce redundancies for educators and school leaders. For example:

Strand 8 in the 3–5 Grade Band	Strand 8 in the 6–8 Grade Band
<ul style="list-style-type: none"> • <i>“Identify what to do if they or a peer are experiencing period discrimination and/or shaming by reaching out to a trusted adult.”</i> • <i>“Discuss strategies to interrupt or prevent period related teasing.”</i> 	<ul style="list-style-type: none"> • <i>“Explain how to report period related bullying or discrimination to a school staff or other trusted adult.”</i>

Strand 2 in the 6–8 Grade Band	Strand 2 in the 9–12 Grade Band
<ul style="list-style-type: none"> • <i>“Identify how period stigma appears in society, including how period stigma differs depending on considerations of race, class, and gender identity, and the impact on menstruators’ behavior.”</i> 	<ul style="list-style-type: none"> • <i>“Identify how period poverty/stigma disproportionately impacts different menstruators (depending on race, educational status, socioeconomic status, gender) and the consequences this has on menstruators’ health.”</i>

The State Board’s responsibilities around academic standards include approving those that “contain coherent and rigorous content”³ and “encourage the teaching of advanced skills.”⁴ We suggest OSSE consult Bloom’s Taxonomy of Teaching, Learning, and Assessment⁵ when reviewing the vertical alignment of grade bands and whether standards are measurable.⁶ The majority of action words in the draft menstrual health standards are from the first or second tier of Bloom’s Taxonomy (i.e., remember and understand). From grade band to grade band, standards with similar topics could use action words from progressively higher on the taxonomy to help students develop a more thorough understanding. While students from all three grade bands can

³ § 38–2652(a)(2)(B)

⁴ § 38–2652(a)(2)(C)

⁵ <https://bloomstaxonomy.net/>

⁶ A similar suggestion was included in one of the [Social Studies Standards Advisory Committee Guiding Principles](#) titled, “Use active voice and precise language in revised standards.” See page 4 for the text of that guiding principle.





and should engage in all levels of thinking, it is developmentally appropriate to include more higher-level action words for older students.

The State Board thanks OSSE again for its work in designing an informational sign on period product use and developing this first-of-its-kind set of menstrual education standards. We share OSSE's belief in the importance of providing all District students with an understanding of the biology, products, and social stigma around menstruation and equipping them with the skills to communicate, make effective decisions, and advocate around the rights and health of menstruators. We look forward to continued partnership with OSSE in ensuring that the District's students have access to academic standards of the highest caliber and welcome any questions about the above recommendations.

Sincerely,

The D.C. State Board of Education

