



February 10, 2025

Dr. Antoinette Mitchell
Interim State Superintendent of Education
Office of the State Superintendent of Education
1050 First Street NE
Washington, DC 20002

Dear Interim Superintendent Mitchell,

The D.C. State Board of Education (State Board) advises the Office of the State Superintendent of Education (OSSE) on state regulations and approves high school graduation requirements recommended by OSSE.¹ Because OSSE shared an early iteration of its vision for reimagining high school graduation requirements at the working session on November 6, 2024,² the State Board determined that it would be more productive at this time to share clarifying and probing questions with OSSE rather than providing specific feedback. Responses to these questions will help the State Board understand OSSE’s proposal more deeply, enabling us to engage the public better and collect relevant feedback. The State Board looks forward to continuing collaboration with OSSE to refine the District’s future high school graduation requirements, positioning local students for postsecondary success.

1. **Steering Committee:** OSSE has shared that they are working with a “steering committee” to guide the process of revising D.C.’s high school graduation requirements. Who sits on this committee, and how were they selected? What guiding questions has the steering committee been tasked with addressing? How have their discussions and recommendations influenced the initial vision for graduation requirements presented at the November working session?
2. **Determining Foundational Academic Knowledge:** The initial recommendations that OSSE shared included reductions in the number of credits required for math, science, and social studies. What factors contributed to this recommendation? One of the District-wide graduate profile competencies is Foundational Knowledge and Skills, which include the development of “competence across foundational academic content areas.”³ What conversations has OSSE had with District residents about defining “competence” and “foundational” in the context of the graduation requirements? How has OSSE considered the minimum admissions requirements of youth apprenticeships and nearby universities in these discussions? During the November working session, OSSE mentioned that many other states require three years in

¹ D.C. Code § 38–2652(a)

² OSSE. (November 2024). *SBOE Working Session Presentation on Graduate Profile & Graduation Requirements*. <https://www.dropbox.com/scl/fi/lp1nxu0wan6p95qtm765/SBOE-Working-Session-Slides-11.6.24-Updated.pptx?rlkey=86xoeqf6gug3uvoio49zoanax&st=w98j189q&dl=0>

³ OSSE. (2024). *DC-Wide Graduate Profile*. https://osse.dc.gov/sites/default/files/dc/sites/osse/page_content/attachments/DC-wide%20Graduate%20Profile.pdf





these subjects; however, D.C. has often been a leader, rather than a follower, in education policy (e.g., the nation’s first statewide menstrual health standards, the acknowledgment of the impact of racism and other forms of discrimination in our social studies standards when other states are banning such topics). While national policy trends can be instructive, they aren’t necessarily a sufficient basis for changing D.C. policies. In this instance, how would requiring 3.0 credits of math, science, and social studies—rather than 4.0—better serve District students specifically?

3. **Course Availability:** Presumably, one of OSSE’s intentions in reducing the required number of math, science, and social studies credits is to create more flexibility for students to pursue their interests; however, there is a possibility that this may limit certain students’ course options. Graduation requirements are a driver of school budgets, staffing, and scheduling. If students are required to take fewer credits in these subjects, what steps could OSSE take to ensure that students who want to continue more advanced study can do so? The State Board has received testimony that many students already have few options beyond the bare minimum in subjects like art, music, and foreign language, and teachers and community members are concerned this trend will continue and spread to other subjects:

“At HD Woodson we have seen some improvement in the NAF academy spending to provide programming to all our students but we still are seeing no foreign language above a 2nd year, limited to no elective art and music classes, and a few social studies courses beyond the minimum required to graduate. If the basic graduation requirements are made “flexible” or lowered or condensed in any way, it will give DCPS license to reduce the already limited number of staffing we receive.”⁴

“It [flexibility] should not come at the expense though of a strong academic foundation for all students. How can we prevent tracking by school – can all students have the option for 4 years of math or science? That is not what has happened with world language.”⁵

Does OSSE have information from the course collection initiative about schools’ offerings for extending students’ learning in arts or a foreign language past the number of credits required for graduation? Are opportunities for advanced study distributed equitably across the city? Some states require that schools offer certain classes even if students aren’t required to take them, like Connecticut has done with computer science coursework.⁶ Has OSSE considered similar policies to ensure student coursework options in D.C. are not limited further?

⁴ Fuchs, L. (November 2024). *Public Testimony*. <https://www.dropbox.com/scl/fi/8uk2ed1vlnvna2paezyw0/Laura-Fuchs-SBOE-Graduation-Requirements-Testimony-2.docx?rlkey=4uxm1dvna6cp8d19eflvfg97&st=hxdnfp6&dl=0>

⁵ Reilly, C. (December 2024). *Public Testimony*. <https://www.dropbox.com/scl/fi/91px6w86vy517ij5u7hhw/Cathy-Reilly-Testimony.pdf?rlkey=8jld5sdmmnory5fyitfq66m5&st=bapm7eb2&dl=0>

⁶ Connecticut State Department of Education (2018). *Computer Science Implementation Guidelines*. p.12. <https://portal.ct.gov/sde/computer-science/computer-science>





4. **Total Credit Trends:** District students must earn at least 24.0 credits to graduate from high school, but some schools allow or require more. What information, if any, does OSSE have on the number of credits that can be accommodated in students' schedules at different District high schools?
5. **Science:** Why did OSSE single out biology as the only required science course? The current graduation requirements also specify that students must take 3.0 lab science credits, but lab sciences were not mentioned during OSSE's presentation. Does OSSE intend to recommend requiring lab science credits or forgo that requirement in the future?
6. **World History:** OSSE has recommended reducing the number of social studies credits from 4.0 to 3.0. As part of this shift, the required credits in World History I and II would be consolidated to require only World History. Does OSSE envision students choosing between World History I or II? Since World History I is currently a prerequisite for World History II, would there need to be any changes to the social studies standards or curricula to ensure no critical background knowledge gaps for students taking World History II?
7. **Art and Music:** What was OSSE's motivation for suggesting keeping credit requirements for art and music separate? This is atypical among other states, which usually have a general arts requirement (if they require arts at all). Additionally, D.C.'s arts education standards currently comprise music, dance, theater, and visual arts standards. What guidance does OSSE provide LEAs for determining what courses students may count toward the art and music credit requirements?
8. **Health and Physical Education (P.E.):** At the November working session, the State Board and OSSE discussed some schools' apparent confusion about whether a stand-alone health course is required. Both in OSSE's November presentation and the current graduation requirements in the D.C. Municipal Regulations, the health and P.E. requirements are grouped together, totaling 1.5 credits.⁷ When reading the graduation requirements, students and administrators might assume that any combination of 1.5 health and P.E. credits is sufficient. However, the D.C. Code specifies that District schools must provide instruction in CPR to students in grades 9 through 12 by including it "in at least one health class necessary for graduation."⁸ How, if at all, does OSSE clarify for LEAs acceptable ways to divide the 1.5 health and P.E. credits? Has OSSE considered revising the graduation regulations to clarify how students must earn health and P.E. credits?
9. **Career Preparation:** One of the new graduation requirements that OSSE has recommended is 0.5 credits in "Career Preparation." Is this a course? If so, what does OSSE envision it will cover? How would this course suit the needs of students who intend to pursue college in addition to those who intend to transition directly into the workforce? Are any local high

⁷ 5-A DCMR § 2203.3

⁸ D.C. Code § 38-824.02(b-1)





schools currently teaching a career preparation course that OSSE would point to as exemplars? All other credit-bearing graduation requirements are linked to academic standards, so does OSSE plan to create career preparation standards?

10. ***Credit Flexibility Guidance:*** OSSE’s initial graduation requirements recommendations stated, “Where applicable, course substitutions and competency-based equivalencies may apply.” What guidance does OSSE currently give to LEAs about when course substitutions or competency-based equivalencies are applicable and appropriate? In other words, how does OSSE ensure that students engage in rigorous, standards-aligned learning regardless of the credit-earning method? What kind of experiences are offered in lieu of the traditional 120 hours of classroom instruction at the schools that currently have approved competency-based credit waivers? Are there any subject, grade level, or other relevant trends in current competency-based course offerings?
11. ***College Level or Career Preparatory (CLCP) Coursework:*** D.C.’s current graduation requirements state that students must complete at least 2.0 of the minimum 24.0 Carnegie Units in a CLCP course (e.g., AP, IB, dual enrollment, CTE). This was not mentioned during the November working session presentation. At this time, does OSSE anticipate it will recommend keeping or removing this requirement?
12. ***Community Engagement:*** Who determines what kinds of activities a student may count toward the community service graduation requirement? Does OSSE plan to include a definition of community engagement in the final updated graduation requirements and/or via informal guidance? OSSE explained some of the feedback that led to reconsidering the number of service hours, but what factors did OSSE consider when deciding to recommend reducing the number of hours required to 60?
13. ***Postsecondary Plan, Contents:*** Does OSSE envision requiring particular elements to be included in postsecondary plans? Are any local high schools currently working with students on postsecondary plans that OSSE would point to as exemplars?
14. ***Postsecondary Plan, Implementation:*** What kind of guidance, resources, and technical assistance might LEAs need to execute and regularly update postsecondary plans with students? Which staff member(s) does OSSE envision would lead the work on postsecondary plans at a school? Does every D.C. high school have a college counselor (or equivalent advisor)? What is the ratio of students to postsecondary/college/career counselors in D.C. high schools?
15. ***Postsecondary Plan, Responsibility:*** Who does OSSE imagine will be responsible for students’ postsecondary plans in the final graduation requirements regulations? Will OSSE require schools to create postsecondary plans with students or will creating and periodically updating a postsecondary plan be a graduation requirement for students in the same way that course credits or community service/engagement is? If the latter, how could we ensure that





students are not prevented from graduating due to the lack of an updated postsecondary plan if showing all other signs of postsecondary readiness?

16. **Capstone Project:** Does OSSE anticipate developing more specific criteria for what must be included in a capstone project? What kind of guidance and support does OSSE think LEAs may need to implement capstone projects for students and align them meaningfully with the graduate profile competencies?
17. **Diploma Seals:** Although certain LEAs have established specific diploma seals (e.g., DCPS offers a seal of biliteracy), D.C. has not defined any state-level seals or endorsements. What discussion, if any, has OSSE had around the possibility of creating state-level diploma seals?
18. **Diploma Pathways:** At the November working session, OSSE’s presentation stated that “students can pursue a Career and Technical (CTE), advanced studies, or individualized pathway to earn recognition on their diploma.” Does OSSE envision students being required to choose one of these pathways, or might students complete the graduation requirements without defining a specific pathway? What training, resources, or technical assistance might help mitigate the possibility of pathways becoming a form of tracking?
19. **Diploma Modification for Students with Disabilities:** OSSE’s presentation mentioned that “qualifying students with an IEP will have the opportunity to earn a state diploma with modifications aligned with their IEP.” Does this refer to creating a state-defined alternate diploma or modifying elements of a regular diploma based on students’ IEPs? If the latter, what type of modification to the graduation requirements is permitted within the ESSA definition of a regular high school diploma?⁹
20. **Public Perceptions About IEP Certificates and Diplomas:** While a state-defined alternate diploma has clear differences from a certificate of completion for students with disabilities, employers and other members of the public may not always perceive a meaningful distinction between the two. Does OSSE have any initial ideas about how to communicate with parents, community organizations, employers, and others about the merits of a state-defined alternate diploma, thereby expanding postsecondary opportunities for students with disabilities?
21. **Student Perceptions About Graduation:** What information, if any, does OSSE have about how D.C. students perceive the value of earning a high school diploma and whether they see it as a worthwhile endeavor? What work may need to be done to improve young people’s buy-in with high school graduation and postsecondary pursuits?
22. **Readiness and Success of Recent Graduates:** In 2012 and again in 2017, D.C. was criticized for reports that most District high school graduates enrolled at UDC needed remedial

⁹ ESEA Section 8101(43)





coursework to catch up with their peers.^{10, 11} What information, if any, does OSSE have about more recent rates of District graduates needing to take remedial coursework? What other metrics does OSSE consider particularly indicative of recent graduates' postsecondary readiness and success?

23. ***Responding to Postsecondary Unreadiness:*** The State Board and OSSE collaborate on the important work of setting priorities and benchmarks for the educational success of District students through regulations, standards, and other policies; however, refining and adopting these expectations does not always translate cleanly into an improved educational experience for students. Implementation and monitoring are key. When OSSE notices that a school or LEA is struggling to prepare students adequately for postsecondary success—for example, through poor or stagnant rates around graduation, postsecondary placement, remedial coursework, or other metrics—how does OSSE respond? Beyond qualifying under ESSA for comprehensive support and improvement through graduation rates, are there situations that would trigger OSSE to provide more intensive support to a high school to address postsecondary unreadiness among graduates? What resources, technical assistance, or other interventions does OSSE utilize to increase the likelihood that all District students exit high school with the knowledge and skills they need to succeed?

24. ***Anticipated Timeline for Implementation:*** With which graduating class does OSSE hope that new graduation requirements will go into effect? Which of the recommended changes, if any, does OSSE think may need to be rolled out over time?

The State Board thanks OSSE and the graduation steering committee again for the time and effort they have spent on reimagining the District's high school graduation requirements and developing a proposal that will prepare the District's future graduates for an everchanging postsecondary landscape. Although we must do more engagement and iteration before finalizing these regulations, the State Board is excited to fulfill our statutory duties and vote on finalized high school graduation requirements later this year.

Sincerely,

DC State Board of Education

¹⁰ Gartner, L. (2012). UDC officials: Fund us like DC Public Schools. *Washington Examiner*.

<https://www.washingtonexaminer.com/policy/education/160997/udc-officials-fund-us-like-dc-public-schools/>

¹¹ Baca, N. (2017). Faking the Grade: 98% of DCPS graduates need remedial courses. *ABC 7*. <https://wjla.com/features/faking-the-grade/faking-the-grade-98-of-dcps-graduates-need-remedial-courses>

