

Ed 306 Written Testimony_redacted

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From: [Seth Andrews](#)
To: [Shea, Julie](#); [Adams, Angela](#)
Cc: [REDACTED]; [Lane, Ann](#); Philip.J.Nazzaro@affiliate.doe.nh.gov; [Cline, Andrew](#); Ryan.A.Terrell@affiliate.doe.nh.gov; James.M.Fricchione@affiliate.doe.nh.gov
Subject: Don't gut NH's 306 Standards
Date: Sunday, April 7, 2024 9:20:40 PM

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To whom it may concern,

NH students deserve higher educational standards not lower educational standards. This attempt to drive down our schools' standards is a race to the bottom. It's pretty hard to overcome educational impoverishment and this is what the proposed 306 changes would do. I believe in local school control but I also believe that some school districts are too short sighted to think long term about student welfare over the course of that student's educational journey. And it is usually in the poorer districts that local boards want to gut our student's educational offerings in order to save money. Please add my comments to the record, noting that the NH Educational Board should be focused on lifting all students up to the same level playing field rather than racing to gut standards.

Respectfully,

Seth Andrews
Keene NH Teacher and
Resident of Walpole NH

From: [Edelblut, Louis \(Frank\)](#)
To: [Shea, Julie](#)
Subject: FW: Please Reverse Course on your Overhaul of the NH 306 Rules
Date: Thursday, April 11, 2024 11:55:49 AM

Frank Edelblut | Commissioner
New Hampshire Department of Education

The contents of this message are confidential. Any unauthorized disclosure, reproduction, use or dissemination (either whole or in part) is prohibited. If you are not the intended recipient of this message, please notify the sender immediately and delete the message and any attachments from your system.

From: Rachel Bendroth <noreply@adv.actionnetwork.org>
Sent: Thursday, April 11, 2024 9:13 AM
To: Edelblut, Louis (Frank) <frank.edelblut@doe.nh.gov>
Subject: Please Reverse Course on your Overhaul of the NH 306 Rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Commissioner Frank Edelblut,

306 Rules are the requirements that dictate what makes a public school by addressing a long list of specifications, from what students will eat in the cafeteria, to how many kiddos are allowed in each classroom. The 306s are what define the foundation of public education in our state.

The current 306 draft is poorly organized, confusing, and contains some concerning edits.

The proposed rules as currently written remove certification requirements for educators. They also fail to include feedback from representatives who can speak to the needs of different school districts, as they were not asked to participate in the draft process. These proposed rules also fail to include feedback from parents and parent groups (like PTA/PTOs), as they were also prevented from participating in the draft process. Furthermore, the proposed rules disregard the concerns brought up by educators, parents, and experts, who have grave concerns with the current proposal.

I am urging you to reverse course on this massive rewrite. We will only accept revised 306 Rules that strengthen public education in New Hampshire!

Rachel Bendroth
[REDACTED]
[REDACTED]

Exeter, New Hampshire 03833

|

From: [Adams, Angela](#)
To: [Suzanne H. Brown](#)
Subject: RE: Revisions of 306 rules a mistake
Date: Monday, April 29, 2024 10:20:10 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12.

Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Suzanne H. Brown [REDACTED]
Sent: Sunday, April 28, 2024 9:00 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Revisions of 306 rules a mistake

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

I am a taxpayer who is very concerned about the proposed changes in the 306 rules. Why should public dollars be diverted from public schools, in which the academic progress of students is carefully measured through tests administered by disinterested parties and whose curriculum is vetted, to go to individual parents who wish to homeschool with little oversight or accountability? I don't disapprove of homeschooling in particular instances, but I think the results should carefully be measured and evaluated if public dollars are used to support such home schooling. I am also concerned that parents who take public dollars to educate their kids at home or in private schools deprive the public schools of the resources that contribute to the education of ALL children, including those who have special needs or who come from difficult home situations that make learning more difficult. As citizens, we have a stake in the education and future lives of these students too, but diverting money from the public schools to parents who are only concerned with what their own kids learn at home or in private schools will certainly leave the public schools less able to create the well-educated broad citizenry we need in our democracy. Please share these views with the Commissioner of Education and with the members

of the State Board of Education. Sincerely, Suzanne Brown

From: [Barbara Bryce](#)
To: [Shea, Julie](#)
Subject: Opposition to proposed 306 Rules
Date: Tuesday, April 30, 2024 10:18:08 AM

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Dear Ms. Shea,

I am a clinical psychologist employed at a NH public charter school. I am very concerned that the proposed rule changes will erode the quality educational standards that have successfully operated in our state since I became involved in education 19 years ago. Please do not accept these rule changes.

Respectfully submitted,
Barbara A. Bryce, Psy.D.

From: [Mary Cad](#)
To: [Adams, Angela](#); [Shea, Julie](#)
Subject: Concerning ED306
Date: Monday, April 15, 2024 2:39:44 PM

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As a New Hampshire resident who has always supported public schools, i'm concerned that the push to a voucher system and adoption of rules by non-educators is going to ruin our public schools. Public schools are a place where diverse groups of children meet, learn to respect each other, and how to communicate with other children who may disagree with them. All these skills seem to be missing in today's society, so instead of perpetuating this problem, let's give our children a chance to appreciate difference rather than fear it. This kind of understanding begins on the playground and is perpetuated by good teachers with curriculums that include everyone's history. Let's make New Hampshire a friendly place to live for all. Mary Ann Cadwallader

From: [Sean Cox](#)
To: [Shea, Julie](#)
Subject: Draft of the ED 306 Minimum Standard Rules 2024
Date: Friday, April 26, 2024 12:51:31 PM

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Ms Shea,

My name is Sean P Cox and I retired after 39 years of teaching science, health, and physical education in the Salem NH school district, SAU 57. I have read the recently proposed ED 306 Minimum Standard Rules. I feel these watered down guidelines are bad for children. What looks like giving communities more control will surely result in poor standards that will result in poorly educated school children especially in communities where funding is difficult.

I view this as the State of New Hampshire shirking its constitutionally guided duty. These new standards need to reflect the longstanding NH constitution supporting an equal and accessible education for all children in NH.

Respectfully,

Sean

Sean P Cox ATC

[Redacted signature block]

From: [Adams, Angela](#)
To: [REDACTED]
Subject: RE: 306 Rules Revision
Date: Monday, April 29, 2024 2:12:16 PM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12.

Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Hackmann, Kent ([REDACTED]) <[REDACTED]>
Sent: Monday, April 29, 2024 12:33 PM
To: Berwick, Stephen <Stephen.W.Berwick@doe.nh.gov>
Subject: 306 Rules Revision

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Dear Members of the New Hampshire State Board of Education,

I am 86, a vet (active duty with 56th Arty Brigade, assigned to the 64th Air Division, NORAD, Stewart AFB; completed duty with rank of captain), and the grandfather of a student competing her senior year in high school.

I am a firm believer in the role of public school education, which I experienced from early grades in Lubbock Texas during WWII, continued in Chicago, and finished in the Berkshires of Massachusetts. Public schools, as I see it, are a core part of American democracy, preparing students for roles as responsible, productive citizens.

I have followed the news about the way the Board is currently revising the 306 Rules. As I understand the news, the draft proposal that the board is considering lowers academic standards, lowers the value of teaching, removes local decision-making, changes “shall” to “may” in several areas to weaken academic standards and teacher certification requirements, and seeks to undermine our public school standards and change the future of public education – all to shirk the state’s responsibility to fully fund adequate public schools.

As an active citizen and vet who defended “Boston Sector” from a Soviet air attack, I am most distressed by the direction of the 305 Rules revision. Rather than watering down standards, the State Board should be raising them to meet the needs of an increasingly complex world.

I saw those needs, circa 1960, in the NORAD sub-headquarters where officers and men monitored the air space of “Boston Sector” as displayed on cathode ray tubes. Fortunately the enlisted men under my command had a sound public school education that prepared them for carrying out the unit’s mission. Modern defense systems are much more complex and sophisticate than those I knew the 1960s, and today the military and civilian sectors need the best trained high school and college graduates that the schools can produce.

The challenges of today are much demanding, whether in the civilian world or in the military. Investment in our public schools pay dividends in the future. The standards must be robust to prepare students for the days ahead. Please make revisions to strength 306 Rules.

Respectfully,

Kent Hackmann

[REDACTED]

[REDACTED]

[REDACTED]

From: [Melissa Hinebauch](#)
To: [Shea, Julie](#)
Subject: Please oppose Commissioner Edelblut's changes to the minimum standards/306"s
Date: Thursday, April 11, 2024 2:06:35 PM

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Dear Julie Shea,

Please oppose Commissioner Edelblut's changes to the minimum standards.

The proposed rules would significantly diminish the education students receive - especially the 75% of NH students who live in "property poor" communities - and would make even worse the egregious disparities in educational opportunities caused by our current unfair system of funding schools. In drafting these proposed rules, Commissioner Edelblut ignored input from people who actually work in public schools, send their children to them, attend them, or pay for them. This is a blatant misuse of power and a reminder that Commissioner Edelblut is trying to dismantle New Hampshire's public schools.

The fox guarding the henhouse, indeed.

Sincerely,

Mel Hinebauch
Concord, NH 03301

From: [Susan Holcombe](#)
To: [Shea, Julie](#); [Adams, Angela](#)
Subject: Testimony against currently proposed ED306 rules
Date: Wednesday, April 10, 2024 9:11:19 PM

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Kindly convey to the NH State Board of Education my request that they discard the current Department of Education proposed changes to the ED306 rules and start again with a transparent and professional approach that serves the interests of the children of New Hampshire. My views are included in the excerpt below, a version of which was published as an OpEd in the Valley news on April 4, 2024.

Thank you,
Susan Holcombe
Hanover NH

A version of this was published in the Valley News on April 4, 2024.

Rules Changes Threaten NH Schools

Do you think that policy governing how our schools run is made by local, elected school boards and perhaps by the legislature? Think again. We are about to see some radical changes in rules for NH schools. These are changes that will occur largely under the radar through revision of the ED306 rules, which are administrative rules that guide the implementation of education law. ED306 rules set standards and limits so that all public schools operate by the same rules and assure that all students receive an adequate education.

What's the problem? Despite allocating \$75,000 to an outside contractor to develop a draft of the revised rules, the Department of Education has persisted in developing its own version of the rules, ignoring the inputs of public school teachers, administrators and parents. Reading the proposed ED306 rules and comparing them to the existing rules is a mind-numbing experience—for which most of us lack the time. What should jar us awake are the many concerns of educators that, under the new rules, local school board control is ceded to the state; educational standards are eroded by reducing required qualifications for teachers; legitimizing for credit online courses for which there is no accountability; eliminating class size minimums, and much more.

The last opportunity for public input may pass quietly. The NH State Board of Education will hold a public hearing on April 3 in Concord at 1:00 pm on the first half of the ED306 proposed rules. A hearing on the second half of the proposed rules is tentatively scheduled for April 11. It is easy to be pessimistic. The NH Department of Education and the State Board of Education are not likely to respond to any testimony recommending changes or reconsiderations of the

ED306 rules.

Is that skepticism justified? Look at the history of the development of the draft rules. The NH Department of Education engaged The Center for Competency-Based Learning (CCBL) to ‘facilitate a revision’ of the ED306 rules and write a first draft. In 2022 a NH think tank was able to look at that draft. They noted that the draft proposed a significant overhaul of the rules that would have significant implications for public schools. The NH Education Department submitted this first draft to the State Board of Education—which did give a pause to allow time for public input. CCBL did take on revision and organized 13 listening sessions around the state and, for the first time, met with NH’s largest teachers’ union and with other educational professionals. At the 13 listening sessions teachers, administrators, parents and others overwhelmingly expressed multiple concerns about hollowed out standards, local school board loss of control, and many loopholes that would allow the NH Education Department to weaken public education.

By some accounts, CCBL took the listening sessions content into account as they prepared Draft 2 of the ED306 rules, submitted to the Department of Education in January of 2024. The Department is under no obligation to accept the CCBL draft. It is only advisory. The document that the Department presented to the State Board of Education on February 15 looks quite different from the second CCBL draft. The Reaching Higher New Hampshire (RHNH) policy director has analyzed the Department version and its differences with the current rules. Beyond the six primary concerns about loss of local control and hollowed out standards, Christine Pretorius worries that the NHED proposed rules are a mechanism for changing how New Hampshire funds an adequate education. (Remember that New Hampshire has yet to deal with the consequences of the ConVal decisions that mandate increases in state funding for an adequate education).

It is hard to visualize the impact of the proposed ED306 rules on students and school districts. In a webinar, Reaching Higher New Hampshire gave examples of how the new rules might affect education in a property poor versus a property rich town.

<https://reachinghighernh.org/wp-content/uploads/2024/03/Minimum-Standards-Public-Briefing-March-2024-1.pdf> Here are some examples they offer:

Jack attends a rural high school in New Hampshire. His school is the center of his community -- despite a lack of state funding, voters pass their budget each year, but it’s getting difficult.

Mia attends a well-funded suburban high school in New Hampshire. Her school has lots of resources, and last year, she was able to take a field trip to Europe to study Spanish.

Jack’s school board cuts courses and offers online “learning opportunities,” but he’s struggling because he doesn’t have a teacher he can go to when he has a question about the recorded lesson.

In Jack's relatively small high school, his physics teacher also teaches algebra as a minor assignment. After the passage of the rules, his district has to hire a part-time, uncertified teacher to teach math instead. Because Jack's teacher can't have a full course load, he leaves the school for a neighboring district.

Mia's school board is trying to balance the changes in the rules and what it means for their library staff: they want to continue to offer courses in media literacy and critical research skills, but the rules shift the role to a position that curates their library collection.

Now that class size requirements have been eliminated, Jack's school board has decided to merge two elementary school classes in his district. Now, the second grade class in Jack's school district will have 34 children for one teacher.

Mia's classmate, who would be a first-generation college student and has dreams of becoming a nurse practitioner, is unsure about what's next after high school. But with the removal of her school's career education program, she and her family aren't sure how to navigate the complex college application process.

In early April, the Commissioner, who lacks classroom experience, and the State Board of Education are likely to forge ahead with their version of the rules changes. Students and School Boards will watch the consequences play out over the coming years.

Susan Holcombe
Hanover NH

From: [Margaret Jernstedt](#)
To: [Shea, Julie](#)
Cc: [Adams, Angela](#)
Subject: Please do not support the current draft of the ED 306 rules
Date: Wednesday, April 17, 2024 4:34:33 PM

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Honorable Shea and Honorable Adams,

I have been advised to get my recommendations to the State Board of Education on the proposed rules changes as to how public schools in NH can operate.

I have been advised that you may help express my concerns regarding the need to **oppose** the current draft of ED 306 rules.

I am a retired educator, and I know the importance of limits on class size, and I know the importance of supporting our public education. I know the importance of having highly skilled professional educators involved in the development of curriculums for all levels in our schools. Educators and school administrators who have experience with successful programs and know what works for our young people need to be involved in all design of programs, curriculums, and educational standard setting in our state.

Thank you for your service to our young people who deserve public schools with the highest quality education.

Sincerely,

Margaret Jernstedt
Hanover, NH 03755

From: [Edelblut, Louis \(Frank\)](#)
To: [Shea, Julie](#)
Subject: FW: Please Reverse Course on your Overhaul of the NH 306 Rules
Date: Thursday, April 11, 2024 11:56:08 AM

Frank Edelblut | Commissioner
New Hampshire Department of Education

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From: Kristi Lockhart <noreply@adv.actionnetwork.org>
Sent: Thursday, April 11, 2024 9:04 AM
To: Edelblut, Louis (Frank) <frank.edelblut@doe.nh.gov>
Subject: Please Reverse Course on your Overhaul of the NH 306 Rules

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Commissioner Frank Edelblut,

306 Rules are the requirements that dictate what makes a public school by addressing a long list of specifications, from what students will eat in the cafeteria, to how many kiddos are allowed in each classroom. The 306s are what define the foundation of public education in our state.

The current 306 draft is poorly organized, confusing, and contains some concerning edits.

The proposed rules as currently written remove certification requirements for educators. They also fail to include feedback from representatives who can speak to the needs of different school districts, as they were not asked to participate in the draft process. These proposed rules also fail to include feedback from parents and parent groups (like PTA/PTOs), as they were also prevented from participating in the draft process. Furthermore, the proposed rules disregard the concerns brought up by educators, parents, and experts, who have grave concerns with the current proposal.

I am urging you to reverse course on this massive rewrite. We will only accept revised 306 Rules that strengthen public education in New Hampshire!

Let's do the right thing for all of the children in our state. Please keep politics out of it!

Kristi Lockhart
[REDACTED]
[REDACTED]

Newmarket , New Hampshire 03857

|

From: [Adams, Angela](#)
To: [REDACTED]
Cc: [Shea, Julie](#)
Subject: RE: Public Comments on NH Minimum Standards
Date: Monday, April 29, 2024 1:24:53 PM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12.

Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Rick Whitesel <[REDACTED]>
Sent: Monday, April 29, 2024 12:59 PM
To: Shea, Julie <Julie.R.Shea@doe.nh.gov>
Cc: Adams, Angela <angela.adams@doe.nh.gov>
Subject: Public Comments on NH Minimum Standards

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Dear Ms. Shea and Ms. Adams,

I am writing out of concern regarding the proposed changes to NH's public education system.

The changes inexplicably redefine the very definition of what a public school is. Why? The answer is clear – dismantle public education in favor of private schools, which benefit the wealthy. Lower income families that cannot afford private schools will bear the burden. Property tax payers are seeing their money diverted away from public education, further diluting its value. Lowering standards also will certainly affect the value of a NH education. High school students are applying to colleges and trade schools across the country. How will these kids fare against their private school peers? This educational disparity will have a negative ripple effect far beyond grades K-12. I urge you to reconsider your proposals and consult with a variety of educators to make NH education both strong and equitable.

Thank you,
Alicia McNichols

Nashua

From: [REDACTED]
To: [Shea, Julie](#)
Subject: Minimum Standards rules
Date: Thursday, April 11, 2024 12:01:16 PM

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Dear Julie,

I write because we are very concerned about any changes to the state's minimum standards rules.

My husband and I do not want changing of mastery to proficiency or the removal of equity and more.

We live at [REDACTED] in Concord. We own land on [REDACTED] in Concord. Our children went to NH public schools and we work and pay taxes in NH. Please share our opinion.

Thank you for the work you do.

Respectfully,

Barbara K. Pacelli
Richard R. Pacelli

Sent from my iPhone

From: [Edelblut, Louis \(Frank\)](#)
To: [Shea, Julie](#)
Subject: FW: Please Reverse Course on your Overhaul of the NH 306 Rules
Date: Thursday, April 11, 2024 11:51:35 AM

Frank Edelblut | Commissioner
New Hampshire Department of Education

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From: Bonnie Schrag <noreply@adv.actionnetwork.org>
Sent: Thursday, April 11, 2024 10:38 AM
To: Edelblut, Louis (Frank) <frank.edelblut@doe.nh.gov>
Subject: Please Reverse Course on your Overhaul of the NH 306 Rules

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Commissioner Frank Edelblut,

306 Rules are the requirements that dictate what makes a public school by addressing a long list of specifications, from what students will eat in the cafeteria, to how many kiddos are allowed in each classroom. The 306s are what define the foundation of public education in our state.

The current 306 draft is poorly organized, confusing, and contains some concerning edits.

The proposed rules as currently written remove certification requirements for educators. They also fail to include feedback from representatives who can speak to the needs of different school districts, as they were not asked to participate in the draft process. These proposed rules also fail to include feedback from parents and parent groups (like PTA/PTOs), as they were also prevented from participating in the draft process. Furthermore, the proposed rules disregard the concerns brought up by educators, parents, and experts, who have grave concerns with the current proposal.

I am urging you to reverse course on this massive rewrite. We will only accept revised 306 Rules that strengthen public education in New Hampshire!

Bonnie Schrag
[REDACTED]
[REDACTED]
[REDACTED]

|

From: [Peter Storrs](#)
To: [Shea, Julie](#)
Subject: Concern for 306 Rule
Date: Wednesday, April 10, 2024 5:31:59 PM

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Hello, Ms. Shea

I wish to express my concern over the proposed changes to the minimum standards for public education. I believe that these changes could jeopardize the high standards that New Hampshire has provided for its students for a quality education. I am concerned, upon reading the document on the DOE website and attending one of the local listening sessions last fall in New London, that the overhaul of 306 Rule will be detrimental to the high standards that are necessary for our students. Being a resident of New Hampshire for five decades, I have always been proud of the education that my children received at their local public school and feel that the changes proposed do nothing to carry on that tradition.

Caroline Storrs
Cornish, NH 03745

From: [Adams, Angela](#)
To: [REDACTED]
Subject: RE: proposed changes to New Hampshire public school policy
Date: Monday, April 29, 2024 1:58:24 PM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12.

Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: [REDACTED] <[REDACTED]>
Sent: Monday, April 29, 2024 12:05 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: proposed changes to New Hampshire public school policy

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We are writing to oppose the manner in which Mr. Cline and Mr. Edelblut have proposed changes to the 306 Rules which govern New Hampshire's public schools. The New Hampshire Charitable Foundation's words best sum up our concerns.. I quote, " This (state budget) imperils the promise of public education for all. The new school voucher program will strip funding from our public schools and leave the most vulnerable children - the ones who rely most on the promise of public education - in schools with fewer resources, increasingly inadequate facilities and diminished opportunity."

We object to there not being an accounting of how our tax monies are being used through the EFA program, by home schoolers, religious schools or private schools, and that there is no requirement for availability of, nor is there oversight of, their curriculums.

We object to the fact that the concerns voiced by members of NH School Boards, a curriculum specialist, and other educational professionals have been largely ignored, as has legislative oversight of the Board of Education. Our public schools need to be funded adequately, so that they can operate with the resources and facilities that are required for the needs of each student.... without eliminating numbers of teachers required and without eliminating class size limits. Our public schools should be a source of pride for the state, where parents can be sure their children are receiving an excellent education.

Having served previously on a School Board, sending two children to a NH public school and now four grandchildren in New Hampshire public schools, we object strongly to the way Mr. Edelblut, Mr. Cline and the NH Board of Education have been trying to eliminate funding and local control, and diminish the overall quality of our public schools through lack of adequate funding, and through making changes to the 306 rules largely out of public view.

We look forward to the return of Democratic control of the NH House, Senate, and Governor's office.

Please share this letter with Mr. Edelblut, Mr. Cline and the NH Board of Education.

Michael and Jane Taupier
Meriden, NH

From: [Edelblut, Louis \(Frank\)](#)
To: [Shea, Julie](#)
Subject: FW: Please Reverse Course on your Overhaul of the NH 306 Rules
Date: Thursday, April 11, 2024 11:51:44 AM

Frank Edelblut | Commissioner
New Hampshire Department of Education

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From: Emily Walker <noreply@adv.actionnetwork.org>
Sent: Thursday, April 11, 2024 10:36 AM
To: Edelblut, Louis (Frank) <frank.edelblut@doe.nh.gov>
Subject: Please Reverse Course on your Overhaul of the NH 306 Rules

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Commissioner Frank Edelblut,

306 Rules are the requirements that dictate what makes a public school by addressing a long list of specifications, from what students will eat in the cafeteria, to how many kiddos are allowed in each classroom. The 306s are what define the foundation of public education in our state.

The current 306 draft is poorly organized, confusing, and contains some concerning edits.

The proposed rules as currently written remove certification requirements for educators. They also fail to include feedback from representatives who can speak to the needs of different school districts, as they were not asked to participate in the draft process. These proposed rules also fail to include feedback from parents and parent groups (like PTA/PTOs), as they were also prevented from participating in the draft process. Furthermore, the proposed rules disregard the concerns brought up by educators, parents, and experts, who have grave concerns with the current proposal.

I am urging you to reverse course on this massive rewrite. We will only accept revised 306 Rules that strengthen public education in New Hampshire!

Emily Walker



Newmarket, New Hampshire 03857

|

From: [Adams, Angela](#)
To: [Linda C. Wilkinson](#)
Subject: RE: 306 educational modifications
Date: Monday, April 29, 2024 10:29:04 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12.

Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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-----Original Message-----

From: Linda C. Wilkinson [REDACTED]
Sent: Saturday, April 27, 2024 9:28 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: 306 educational modifications

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Please relay objections to the:

- lack of transparency in the formation process and in the political agenda
- the resultant shift of financial support from education for all to:
- funding for curriculum unexamined for quality

Additionally objectionable:

- .the unseemly avoidance of including educator and parent concerns and

Sent from my iPhone

From: [Whitney Zweeres](#)
To: [Shea, Julie](#)
Subject: 306
Date: Friday, April 26, 2024 11:28:10 AM

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To whom it concerns,

If you gut the 306 standard here in NH that is setting out future leaders up for failure. We already have districts that do not have what other districts have and this would really make that gap worse.

Cutting education is not where the state should look at saving money. Our children deserve a good education.

Thank you for your time.
Whitney Zweeres

From: [Mollie Allen](#)
To: [Shea, Julie](#)
Cc: angle.adams@doe.nh.gov
Subject: Are you trying to increase interest in competency based education?
Date: Friday, April 26, 2024 12:42:49 PM

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To the Commissioner and New Hampshire State Board of Education members,

I am writing about your attempts to establish proficiency-based education throughout the state via the proposed standards. I want you to know that I am familiar with some of richness of that model of when it is used cooperatively, with broad interest and genuine support. It can only be rich and effective when all the pieces are in place, and it's done right.

I am also aware of what I would call an unsatisfactory attempt to get the whole state on board with this form of education. I've followed your years of effort to establish competency/proficiency-based education over the last years, I know PACE was abandoned. While problems with funding and the PACE system imply difficulties, it appears you are implementing a "forced feeding" of this model onto the entire state through the 10 year redo of state education standards-- without first establishing a broadly representative grass roots base. This is bound to create resistance. It's not what you want, it's how you are going about doing it.

About "listening sessions". Was that the only way you applied to inculcate in interest in proficiency-based education across the state? I attended one in September 2023 and was disappointed. First, poor publicity meant I heard about it through the grapevine on the day, not in public announcement weeks ahead of time. Plus, it was not for the public; it was for the SAU 16 co-op school board. It was time for me to shut up and listen to a promotional opinioned, personal PowerPoint lecture. It was one way listening, It wasn't an opportunity to find out more or invitation to become engaged.

That lecture without CURRENT personal examples from CURRENT students, teachers, parents, and administrators didn't broaden my interest, perspectives, or enthusiasm. I didn't hear of excited students and parents traveling to different SAU's telling stories and giving examples of how this form of education works when it's done well. I didn't read or hear of local PTO moms and dads sharing benefits of this form of education with other parent groups in other school districts across the state. I didn't hear of representative teachers who were natural ambassadors to other teachers in other districts. I didn't hear of students successfully entering military institutions or universities and trade based and other community colleges after years of the form of education.

As I wait to hear how things play out with the proposed standards, I see power and determination coming to the fore. This happened in the 90's and '00's when the State Board of Education ignored the science of reading and went with whole language/balance literacy instead of phonology. With that decision and perseveration, more that 20 years of instruction in reading and spelling across the state was second rate and ineffective. In fact it took the Commissioner about more than 5 years to start promoting the most effective approach. That's years of ill served students-almost a quarter of a century!

Now, I see a similar dynamic: a few powerful people in love with a method model are endorsing it no matter what ---the various stake holders and their knowledge aren't factors. Their roles are not acknowledged, their interest is not cultivated in a respectful and gracious way.

In my mind, using power only builds resistance. Without stakeholder interest and support, I see a long, arduous process, with causalities including for some students. I hope you will maintain earlier standards (class size, teacher certification, the Course Content, traditional assessment and accountability standards at local level) while you spread funding and your enthusiasm for proficiency-based education in a broader, cooperative way so that over time all New Hampshire students will benefit.

April 26, 2024

██████████

██████████

Exeter, NH 03833

From: [Dan Caron](#)
To: [Adams, Angela](#); [Cline, Andrew](#)
Subject: Testimony - Min. Standards for Public School Approval (Ed Rules 306)
Date: Monday, April 1, 2024 4:12:07 PM

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Hello Ms. Adams and Mr. Cline,

I am writing this email AGAINST the NHED 306 Draft Rules proposal and FOR the draft proposal from Christine Downing and her team.

I attended the 306s Review Meeting led by Christine Downing at Meredith Library on Friday, March 29. As a teacher with 40+ years in NH public education I was extremely disappointed in the draft 306 Ed Rules that are being presented by NHED. When I started teaching in the early 1980s, NHED had a number of consultants to help teachers develop curriculum, find outside funding, and organize training. Since that time, NHED has become smaller (less personnel to help teachers) but more alarming, the rules have slowly eroded until the NHED 306 Draft Rules, as proposed, is vague and open to interpretation. In some cases the draft appears to be contrary to other NH laws and rules. In these times of debate concerning what constitutes an adequate education and how much funding NH must contribute to fund it, eroding the minimum standards will "allow" some politicians (non educators) to argue the need for less money to meet minimum standards toward an adequate education.

At the meeting, Ms. Downing explained how she and her team went through the NHED Draft proposal, updating the language at the front end to minimize the damage and they were depending upon the input of teachers attending the review meetings to update the content descriptions. With Ms. Downing's assistance, I set out to update the description, goals and content for Technology and Engineering in the Content section of her proposal. I believe the Technology and Education descriptions in the Content section of her proposal is stronger now than it has been in decades. In Ms. Downing's draft proposal, the language used for Technology & Engineering Rules is consistent with the language used in the NH Technology and Engineering teacher certification requirements and the NH Technology and Engineering Curriculum Guide. Furthermore, the Technology & Engineering Content in the three documents mirror the ITEEA STEL being used throughout the US and in other countries. Three events in the last 5 years help to explain further: The revision of the NH Certification requirements for Technology and Engineering teachers (2019); publication of the ITEEA STEL (2020); the revision of the NH Technology/Engineering Curriculum Guide (2022).

In 2018-19, I served with a group of teachers, credentialing personnel and Superintendent Kirk

Beitler to revise the certification requirements for Technology and Engineering teachers. The Technology and Engineering teacher certification requirements now stress the Engineering Design Process and a teacher's ability to use and explain the process to students. Ed 507.05 Technology and Engineering Teacher (eff 8-9-19);

In 2018 the International Technology and Engineering Educators Association (ITEEA) assembled a team to revise the Standards for Technological Literacy (STL). The resulting document, The Standards for Technological and Engineering Literacy (STEL) was published in 2020. ITEEA STEL can be viewed as a free download from the ITEEA. A link to the STEL ETOOL which illustrates the crosswalk between the STEL and the Next Generation Science Standards (NGSS) & Common Core State Standards Math (CCSS Math) and English Language Arts (CCSS ELA) standards is found at <https://www.iteea.org/stel>. STEL is being used in English speaking countries around the world and is available in German, Korean and is currently being interpreted into Chinese.

In 2021-22, I convened a group of Technology teachers to review and update the NH Technology and Engineering Curriculum Guide. The documents we reviewed and referred to in order to complete this work were the previous NH Technology and Engineering Curriculum Guide from 2010, the Credentialing Requirements from 2019, and the STEL from 2020. This resulted in a Curriculum Guide that mirrors the teacher certification requirements. Appendix B of the NH Technology/Engineering Curriculum Guide illustrates where our K-12 grade level performance objectives correspond to the Technology and Engineering standards from ITEEA STEL. Appendix A of the ITEEA STEL document explains the process of comparing the STEL Benchmarks to the Benchmarks from NGSS, CCSS Math and CCSS ELA.

In the past year, the NH State Board of Education accepted two programs into the Learn Everywhere program; WinnAero's ACE Academies and the Private Pilot curriculum from Laconia Flight Academy. In those applications, I wrote that the competencies requiring mastery by a pilot (or anyone in the aerospace industry) are not from any one school subject but come from EVERY subject taught in public schools. The curriculum programs you approved for Learn Everywhere are true examples of STEM/STEAM. Educators who have studied their craft and mastered the skills associated with their subject need to determine the knowledge and skills students should master.

In summary, I am strongly **against** NHED gutting the Content from the 306 Rules and replacing it with the NHED proposed single paragraph that is open to interpretation. I am strongly **for** the Draft Proposal from Christine Downing's group for the 306 Rules. Her draft should be the only one considered as it will keep NH learners moving forward.

Respectfully,

--

Dan Caron

Technology/Engineering Education, School to Careers Coord., Gilford HS
WinnAero Director of Education Services & ACE Academy Director
"Engineering & Aerospace Education"

Civil Air Patrol AEM Teacher of the Year 2013

AFA Teacher of the Year 2004

ITEEA Distinguished Technology Educator 2001

AIAA Educator Achievement Award 1999

EbD-STEM Professional Development/Curriculum Associate/Author

[Click here for the latest exciting news at GHS!](#)

From: [Erin Chubb](#)
To: [Shea, Julie](#)
Date: Monday, April 8, 2024 8:01:52 AM

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Hello,

Please adopt Ed 306 Minimum Standards for Public Approval that include the following:

- Definitions informed by peer-reviewed academic studies.
- Language and definitions that advance CBE and support ongoing CBE efforts by providing a framework for local decisions, continued growth, and innovation.
- Language and definitions that ensure equitable access to a wide range of engaging educational opportunities.
- Language and definitions that ensure high standards and quality programming for students and teachers.
- A minimum number of high school courses that ensure all approved schools are required to offer NH's students with diverse choices in their academic journeys that provide them with new learning experiences, spark their personal passion for continuous learning, help shape and inform future plans, and provide the required course of study for a NH high school diploma.
- Class sizes that assist districts in creating budgets, allocating resources (personnel and supplies), and crafting schedules where students are able to receive personalized, supportive, engaging, expert, and diverse learning.

Best regards,

Erin Chubb, M. Ed.
Principal
Canterbury Elementary School

Education is for improving the lives of others and for leaving your community and world better than you found it.

-MARIAN WRIGHT EDELMAN

From: [Claudia Damon](#)
To: [Shea, Julie](#)
Subject: April 11, 2024 testimony in writing
Date: Saturday, April 6, 2024 6:11:48 PM

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Dear Ms. Shea,

Please distribute this testimony to the full State Board of Education for review prior to the hearing on April 11, 2024, as I am unable to attend but care deeply about public education in New Hampshire. Certainly the Commissioner is welcome to receive a copy.

.....

Dear State Board of Education:

I write with regard to the proposed new rules to be discussed at the April 11, 2024 meeting.

I find it wrong that the Commissioner, in drafting these proposed rules, ignored input from people who actually work in public schools, send their children to them, attend them or pay for them.

I realize that the April 11th Board meeting will concern itself with the half of the rules that refer to the course referenced in the first half of the rules. When those courses are offered, what will they consist of? Every content area required by the rules addresses the program elements of a student's public school education, so people are entitled to know what that requirement should look like. And the Board, in order to do its job correctly, must also know this before approving any rules. So far as I am aware, this work has not been done. At least the public has not seen it. And again, that is wrong.

"Courses" and "Programs" are changed to "learning opportunities" - which is not defined, and therefore simply cannot match the rigor required of courses and programs. It is unacceptable that some online learning opportunities won't be required to have a teacher who students can ask questions of.

It is unacceptable and wrong that the new rules aim to lower standards by changing "mastery" and "proficiency" to "competency." Mastery is what we should be aiming for. Only then is a student competent.

Finally, I think it is wrong to take decision-making away from our communities and locally elected school boards. By offering very little control over curriculum, instruction, and the approval of programs leading to graduation and life after high school, these proposed rules would allow a third party company can create external credit opportunities and remove the school's ability to vet those programs.

A year ago, in a lecture at ultra-conservative Hillsdale College, Christopher Rufo gave a talk. In case you aren't aware, he is a culture war orchestrator, a breaker of things.

His talk explained how to replace public education with a universal voucher system. He said that to get to a universal voucher system, you need to create distrust in the public school system. This is exactly what our Commissioner has been working on. You cannot let this happen. Rufo told his audience to be ruthless. And brutal. Really? Who made him the boss?

I ask you to stand up to this destructive energy. Public education is at center of our democracy. Hitler (and he was not the first) discovered that making the public dumb and unable to think critically, and dumbing down education, made it easy for him to stay in power despite the brutalities his regime inflicted on millions of people. Germany is still dealing with that past.

You either support the democracy that the founding fathers established or you don't. If you do, you must support public education by certified personnel. If you don't you are asking for a revolution, with or without violence, to establish a different country with a different future than by far the majority of Americans and NH citizens want.

Please see to it that the new rules are revised with input from professional educators, people who attend and/or have attended public schools, send their children to them and pay for them.

Thank you,
Claudia C. Damon
Concord, NH

April 10,2024

To the State Board of Education:

I was very disappointed in the listening session on the Ed 306's minimum standards in Manchester. A listening session is meant to listen to the people who speak, restate their issues, questions, concerns, and to record them to assure that the thoughts are considered either individually or grouped together. In this session it seemed that there was more information about the direction the group was going rather than listening to input. There was a recorder, but since that session there has been no follow up or disclosure of how the feedback was used in the revised standards. In addition there was no follow up from any of the listening sessions so the general public would know that their input was considered.

I am also concerned about the lack of references to equity and equitable access to all students in the document. It should be part of the entire document.

There are inconsistencies, changes and omission of language throughout the document that impacts the standards. For instance leaving off local before competencies, local graduation requirements, and other areas around local control should be reinstated.

Changing "shall" to "may" waters down the standards.

What happened to the Arts and PE certification standards at Elementary level? It is crucial that these standards are put back in the document for many of our students from diverse backgrounds the arts are the key to their success.

As the 600's are the standards for public education in NH taking away class sizes makes no sense. We need those standards to assure that we have a standard to guide us as we assure equitable access to all students throughout the state.

I urge you to consider feedback from citizens throughout the state and strengthen these standards to assure that all students have equitable access to a public school education no matter whether they live in Manchester, the most diverse school district in the state, a small rural community, or a suburban community. All students deserve the best we can give them.

Respectfully,
Karen Soule
Citizen Manchester, NH

From: [Marion Anastasia](#)
To: [Adams, Angela](#)
Subject: Board of Education 306's
Date: Monday, April 1, 2024 9:54:31 AM

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April 1, 2024

Dear Members of the New Hampshire State Board of Education,

I write to you today with a heart full of gratitude for your dedication to the students, families, and learning communities of our beloved state. New Hampshire's commitment to providing engaging, innovative, and diverse educational opportunities for all its students is what sets us apart.

While our ranking in education has shifted slightly since 2017, with the most recent US News and World Report placing us at #6 nationally, our commitment to excellence remains unwavering. We are proud of our world-class Pre-K – 12 public education system.

As we navigate the task of updating the Ed 306 Minimum Standards for Public Schools Approval, let us not lose sight of our mission and vision. These standards are the bedrock of our educational system, ensuring that every student, regardless of zip code, receives a personalized and high-quality education.

The process of updating these standards has been rigorous and thorough, involving input from educators, community members, and stakeholders. Let us honor their hard work and dedication by adopting standards that reflect the latest research and promote equity, innovation, and excellence.

I urge you to consider the following when finalizing the Ed 306 Minimum Standards for Public Schools Approval:

Definitions grounded in peer-reviewed academic studies

Language and definitions that promote Competency-Based Education and support ongoing innovation

Equitable access to diverse educational opportunities

High standards for both students and teachers

High school courses to ensure a rich and varied academic experience for all NH

students

Reasonable class sizes that support personalized learning and engagement

Let us not compromise on quality or equity. Our students deserve nothing less than the best.

Respectfully,
Marion Anastasia

Marion Anastasia, Ed.D.
Superintendent, SAU #36
White Mountains Regional School District
135 Regional Road
Whitefield, NH 03598
Whitefield, NH 03598

www.sau36.org

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3 April 2024

Thank you to the Board for receiving this testimony.

My name is Dr. Jacob Bennett of Chester and I represent only myself in this testimony.

Last year I conducted research into the meaning and value of diversity in education contexts, a project that resulted in the publication of *The Belonging Case for Diversity*, a focused literature review that members of this board received last fall. One of my goals in *The Belonging Case* was to review and present empirical studies focused on the impacts of diversity among students and educators, but also, first and foremost, to grapple with and come to a clear and practical understanding of what diversity *means*.

To begin with I sought to understand the legal case for diversity, so I turned to the backbone of the historical and legal concept of diversity in American life: the 14th Amendment to the US Constitution. Records on the debate and drafting of the 14th Amendment make clear that the authors were concerned that the Constitution should protect the rights of all people to have access to necessary public goods like free schools and open markets, which cultivate and sustain a democratic society and its individual members.

I then considered the business case for diversity, which includes significant findings among top-earning corporations that higher rates of diversity within a firm correlate to increased innovation, efficiency, and profitability. These findings run alongside studies in the education literature that show correlation between increased diversity and student outcomes. However, there are also findings from a series of studies that indicate younger professionals and graduate students, particularly those from underrepresented groups, find this instrumental approach to diversity to be alienating. Rather than helping them feel like they belonged, the corporate argument had the opposite effect.

This was the real “AHA!” moment of the research process, because that sense of belonging is exactly what I was reading about in the education literature that indicated improved outcomes for students of color who have even one single teacher of the same race or ethnic background during their school careers. And it was exactly what I was reading about when I was scouring debates about the necessity of equal protection and due process, which promote and enforce the right of public accommodation or the legal right to enter a business open to the public. In other words, diversity is the opposite of those signs that used to say, “No Blacks, No Irish.” Diversity is a sign that says, “All Welcome!” A proper understanding of diversity, then, is rooted in the constitutional right to be in and move around within our society, and this right is nothing short of a right to belong.

With that in mind, it is vital to highlight the folly of removing the principle of diversity from Ed 306.06, Culture and Climate. It is a mistake to assume that the purpose and scope of a mandated “acknowledgement of diversity and respect for differences” can be collapsed into mere “respect for differences” and not suffer tremendous loss of legal leverage to enact programs benefiting underrepresented and/or disproportionately impacted groups. Even the addition of language around “equitable opportunities” falls well short as a tool for educators and policymakers to rely on, especially compared to the compelling state interest that grounds diversity work.

The principles of equal protection and due process were designed to nurture diversity, specifically, and in practical use require more than “respect for differences.” Deleting “diversity” from existing language in Ed 306.06 cannot be understood as a mere editorial decision but a fundamental shift away from requiring affirmative policy and toward allowing passive “respect for differences.” Keep in mind, segregated school populations may learn respect for racial differences, even if from afar, but it is unlikely that they would learn as easily the meaning and value of diversity, which is shaped and urged by a fundamental human need to feel that sense of belonging, that belief that our communities are not the same without us, and we are not the same without them.

Diversity means belonging, and diversity belongs in the 306s.

Respectfully,
Jacob A. Bennett, Ph.D.

From: [Nicole Bump](#)
To: [Shea, Julie](#); [Adams, Angela](#)
Subject: Serious Concerns with Ed 306 Rules
Date: Wednesday, April 3, 2024 9:37:57 AM

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Hello Ms. Shea and Ms. Adams,

I am writing to express my continued deep concern for the proposed changes to the Ed. 306 Rules. As the latest draft from Commissioner Edelblut stands, this standards overhaul:

- Redefines the purpose and structure of school
- Hollows out instructional requirements
- Removes local authority
- Removes class size requirements
- Removes educator certification requirements
- Has serious potential school funding implications

Numerous professional organizations, local school boards, and Granite State residents have also vocalized serious concerns about the potential impact of this proposal.

Failure to address these issues will lead to a public education system that is deeply inequitable, where the value of a New Hampshire high school diploma is questioned.

New Hampshire's children and educators deserve much better.

I strongly urge the Department to reconsider the revisions made to Ed-306 AND to instead reconsider the proposed revisions supported by the NEA-NH and the National Center for Competency-Based Learning.

Thank you for your time and attention,
Nicole Bump
SAU 19 School Board Member

March 30, 2024

To the esteemed members of the New Hampshire State Board of Education:

The mission and the vision of the NH State Board of Education (SBE) are incredibly lofty and integral to supporting the excellent quality of life for NH's residents, providing engaging, innovative, and diverse educational opportunities for all of NH's students and helping to create an enlightened, active, and caring citizenry. Thank you for your service to the students, families, and learning communities in our great state. New Hampshire's Pre-K – 12 public education system is consistently ranked among the best in the Nation. While the ranking has slipped since 2017 (when NH was ranked #1), the most recent US News and World Report ranks NH's Pre-K – 12 education system as #6 in the US. New Hampshire's Pre-K – 12 public education system is indeed world class. With the continued support of the SBE, public schools can evolve and continually improve, and public-school students and families will continue to receive a "personalized, student-centered education in a flexible, innovative learning environment," thus achieving the stated vision of the SBE.

A foundational and fundamental element to the SBE's mission and vision are the Ed 306 Minimum Standards for Public Schools Approval. Setting the minimum standards for a public education system that is already world class and highly ranked is certainly a daunting task. New Hampshire is also renowned for being an early adopter of Competency-Based Education (CBE). Updating the Ed 306 rules is a tremendous opportunity for the SBE to advance CBE and ensure all of NH's students and families, regardless of zip code, can readily access personalized and high-quality education opportunities. Stripping out language and requirements, while simultaneously lowering standards is counter to the SBE's mission and vision. For nearly three years, the Ed 306 rules have been being updated. This process has included a contract with an external organization, Ed 306 work groups, multiple public hearings, and significant volunteer efforts from educators passionately seeking to ensure feedback from the field is brought forth and heard. Please respect this process, voices from the field and communities, the labors of the Ed 306 work groups, and the tireless volunteer efforts of educators.

Please adopt Ed 306 Minimum Standards for Public Approval that include the following:

- Definitions informed by peer-reviewed academic studies.
- Language and definitions that advance CBE and support ongoing CBE efforts by providing a framework for local decisions, continued growth, and innovation.
- Language and definitions that ensure equitable access to a wide range of engaging educational opportunities.
- Language and definitions that ensure high standards and quality programming for students and teachers.
- A minimum number of high school courses that ensure all approved schools are required to offer NH's students with diverse choices in their academic journeys that provide them with new learning experiences, spark their personal passion for continuous learning, help shape and inform future plans, and provide the required course of study for a NH high school diploma.
- Class sizes that assist districts in creating budgets, allocating resources (personnel and supplies), and crafting schedules where students are able to receive personalized, supportive, engaging, expert, and diverse learning.

Please respect and listen to the voices from the field, the public, and members of the 306 work groups. Your adoption of the Ed 306 Minimum Standards for Public Schools Approval is significant to keeping NH as a highly ranked state overall and for Pre-K – 12 public education. Standards that create inequities, remove choices, lower quality, de-value trained and licensed teachers, and are not informed by peer-reviewed research should not be considered.

Respectfully,



From: [Carisa Corrow](#)
To: [Shea, Julie](#)
Subject: Public Comment 306s
Date: Tuesday, April 30, 2024 7:31:15 AM

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

The development and revision of the minimum standards has never been a truly inclusive process in New Hampshire. While I agree this time around has been more public than ever before, it wasn't intentionally so. Absent from this update is an actual review of how the standards have been implemented with feedback from a variety of students, graduates and drop outs from different parts of the state. Let's make it inclusive.

Recently, Aurora Institute, the national leader in competency based education, released a brief which outlined tried practices in reviewing and setting statewide competency policy.

<https://aurora-institute.org/resource/aurora-institutes-2024-state-policy-priorities/>

This is a quality blueprint that starts with asking the community to define outcomes, similar to the Portrait of a Graduate process. Please consider not making adjustments to the current standards and taking time to do this a better way. You can help define a better process for the next update, which unfortunately might go back to being more quietly revised, as it has in the past.

NH has one of the most flexible policies in the country and has for nearly two decades. It won't hurt to keep it a little longer.

While I actually agree with a lot of the changes that put learners in the driver's seat of their education, especially at the secondary level, the changes to the high school graduation requirements are most troubling:

Logic and Rhetoric are ELA skills.

Civility is not something one can assess and is not clearly defined.

Why is NH History listed twice with a separate 1/2 credit as well as combined with US history?

Please define economics more clearly.

I'd also encourage the board to look at Minnesota's policy on innovative schools. What if you changed nothing, but offered schools an easier path to innovation? So, if a school wanted to exceed class size maximum, it could if the plan was intentional. Allow public schools flexibility to operate nimbly.

<https://education.mn.gov/MDE/dse/zone/#:~:text=The%202017%20Legislature%20enacted%20Innovation,form%20an%20innovation%20zone%20partnership.>

Thank you for your considerations,

Carisa Corrow
Penacook

New Hampshire State Board of Education
25 Hall Street
Concord, NH 03301

Dear Members of the Board of Education,

As the former chair of the board that oversees the state's largest school district, I am deeply invested in the welfare and educational prospects of our state. I write to express my serious concerns regarding the proposed revisions to educational standards currently under consideration.

First and foremost, I must address the glaring issue of disregarding community feedback. The numerous listening sessions held across New Hampshire, including those held in Manchester, provided invaluable insights into the concerns of our community. However, the current draft fails to adequately address the feedback garnered from these sessions, undermining the credibility and effectiveness of the entire process. By initiating these forums and subsequently disregarding the input received, the State Board of Education has diminished the transparency and inclusivity essential for meaningful educational reform.

The process around the drafting of these revisions is deeply troubling, but far more alarming is the impact that they will have on our students and our schools. Firstly, the removal of class size maximums for K-12 settings is deeply concerning. Research unequivocally demonstrates the pivotal role of class size in facilitating effective teaching and learning, and reinstating these caps is imperative for the well-being of our students.

Equally troubling is the erosion of local authority in educational decision-making. The removal of references to local competencies, graduation requirements, and assessments undermines the autonomy of districts in tailoring education to suit the needs of their communities. Preserving local control ensures that educators can best serve the unique needs of their students and foster a thriving learning environment.

The elimination of requirements for certified art, music, and physical education teachers in elementary schools is a disservice to our students. These subjects are integral components of a well-rounded education and must be reinstated to ensure the holistic development of every child.

Additionally, the removal of requirements for differentiated student support and the weakening of competency terminology are deeply concerning. Differentiated instruction is essential for addressing the diverse needs of students, and robust competency standards are crucial for ensuring educational excellence.

It is incumbent upon us to advocate for the best interests of our students. These concerns must be earnestly addressed before final approval is granted. I implore the Board of Education to

reconsider the proposed revisions and strive to formulate standards that truly benefit all New Hampshire students.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Joyce Craig". The signature is written in a cursive, flowing style.

Joyce Craig
Manchester, NH

From: [John D'Entremont](#)
To: [Shea, Julie](#)
Subject: Written Testimony Submission for April 3, 2024 Public Hearing Ed Rules Ed 306.01-Ed 306.25 and April 11, 2024 Ed 306.31-306.46
Date: Wednesday, April 3, 2024 8:37:55 AM

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State Board of Education,

I am not in support of the proposed Ed Rules being put forward on April 3rd and April 11th as a teacher, public school principal, and local school board member.

The process followed was not transparent or inclusive. Educators and parents should be able to give their input into revised rules. Revised rules should also not devalue the profession or lower our standards for educating students in our State.

I support the same language shared by NHASP, NHSAA, NHASEA, and NHASCD that suggests we adopt Ed 306 Minimum Standards for Public Approval that include the following:

- Definitions informed by peer-reviewed academic studies.
- Language and definitions that advance Competency Based Education.
- Language that supports local decisions and local control.
- Language and definitions that ensure equitable access.
- Language and definitions that ensure high standards and quality programming for students and teachers.
- A minimum number of high school courses that ensure all approved schools are required to offer NH's students with diverse choices in their academic journeys.
- Class sizes that assist districts in creating budgets, allocating resources (personnel and supplies), and creating schedules that support individual learners.

Thank You,

John P. D'Entremont

Email: [REDACTED]

Phone: [REDACTED]

From: [richard demark](#)
To: [Shea, Julie](#)
Subject: Proposed Changes to the "306" Rules
Date: Wednesday, April 24, 2024 2:42:30 PM

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Our names are Richard and Harriet DeMark and we are residents of Meredith, New Hampshire. We write today, because we are concerned about the proposed changes to the 306 rules and the harm these changes could do to our children, the schools in which they are taught and the communities in which we live.

Of concern to us is that research-based evidence hasn't been shared by the Department of Education to justify the proposed changes to the existing rules. We fear that these changes, if enacted, could impact the accreditation of our public schools. We also feel there has been a disregard for the democratic process in the manner these changes have been proposed.

Throughout this process of changing the 306 rules, research-based evidence to justify the changes have not been provided. Data to justify eliminating class size requirements; removing educator certification requirements; outsourcing instructional opportunities; or that centralizing curriculum at the state level is better than at the local level.

We believe that the proposed changes to the 306 rules ignore the democratic process. Transfer of educational decisions from local elected school boards to the appointed members of the New Hampshire School Board not only steals local control but disenfranchises voters. How can citizens work with or challenge these proposed changes with their own school board?

Finally, we are deeply concerned that the proposed changes to the 306 rules will lead to more New Hampshire schools losing accreditation. Loss of accreditation hurts the student, the school and the community.

We urge the NH Department of Education and NH School Board to not move forward with any proposed changes until the valid concerns we have provided are adequately addressed.

Sincerely,

Richard and Harriet DeMark

██████████, Meredith, NH 03253

April 2, 2024

Dear Members of the State Board of Education,

Over the past 16-months, I have been collecting educator feedback on revisions to the minimum school approval standards for public schools (Ed Rules 306). Recently, I provided 10 full-day review sessions to a total of 300 educators in Hampton, Amherst, New London, Meredith, and Gorham. Educators put forth outstanding efforts to review all the content areas/program elements outlined in current section codes Ed 306.31 through Ed 306.49. I will present a more detailed report of this work at your April 11th hearing relative to those sections of the rules. However, when time was available during our recent sessions, educators also reviewed sections in the first half of the rules, which are the focus of today's hearing.

I am providing a chart below with specific recommendations related to different sections that are being discussed today, which include revised section codes Ed 306.01 through Ed 306.25. Educators were given access to the January 22, 2024, draft and the February 12, 2024, draft, as well as the existing 306 rules, in order to conduct comparisons and develop recommendations.

Here are some highlights of these recommendations. My written testimony contains specific details.

1. Definitions are important to the full set of rules. It is important to retain technical language in many definitions to support a consistent and shared interpretation of these important tenets of competency-based education from one school to the next. There are several recommendations related to definitions. It was a lack of specific definitions that were missing from NH's initial efforts to implement CBE models across the state. Please refer to Appendix B, which includes the acceptable definition of CBE at a national level.
2. Class Size - Please restore the previous parameters regarding class sizes. This will promote equity across our schools.
3. Career & Technical Education Programs - please consider delaying any changes to this section until I am able to provide my full report on all content areas at the April 11th hearing. CTE Directors and teachers, through the educator review sessions, have created draft rules that will combine this section with the CTE curriculum section, which comes in the second half of the rules.
4. Please restore the Assessment section of the rules. A balance assessment system is critical to an effective CBE system. Please refer to Appendix B, which includes the acceptable definition of CBE at a national level.
5. School Psychological Services - Please review Appendix A of my written testimony. There were about a dozen school psychologists and members of the state association who created an entire new draft of the rules to update this section to reflect current and best practices. Please consider tabling this section with more discussions with these educators to produce rules that will provide these important services to our students.
6. Further analysis needs to be conducted on sections related to K-8 Curriculum, High School Curriculum, and High Graduation Requirements. Educators have an abundant

amount of feedback on these sections that I have not had enough time to completely review. Initial questions are presented in the chart included with my written testimony.

While the 306 rules have a variety of stakeholders that are responsible for the implementation of the rules to ensure an adequate education, I would encourage you to carefully review the suggestions from educators, as they are most directly responsible for successful implementation of these rules. It is on their shoulders and backs that public schools are able to provide all NH public school students with a “high quality” educational experience, as mandated by law. Language matters in these rules and it is through careful word choice that educators are providing these recommendations. Their suggestions balance both technical educational language that has specific meanings and shared understanding among educators with language that can be shared and communicated with a variety of stakeholders, including students, families, and community members.

Thank you for your time today. I am willing to accept questions and open to a dialogue regarding information obtained through the educator review sessions.

Sincerely,
Christine Downing
Goshen, New Hampshire



Chart on Educator Feedback

Section	Feedback & Suggestions
Ed 306.02 Definitions	<ol style="list-style-type: none"> 1. For those definitions that are provided in additional RSAs, please consider also including the exact wording of that definition in the 306 rules. For efficiency of use, having the wording along with the annotated RSA code prevents a user from having to conduct multiple searches across different documents to have the correct language available in various situations. (i.e. Academic standards, curriculum, career and technical education, etc.) 2. Restore the January 22nd definition of “achievement of competencies.” This definition includes further clarity of the importance of connecting how proficiency is defined at a local level. 3. Restore the January 22nd definition of “competencies.” This definition was based on CBE research and provides key details of how competency statements can be written, including NHED’s own Competency Validation Rubric. 4. Restore the January 22nd definition of “competency-based education.” This definition was based on national research and promotes a shared understanding of competency-based education across the state. This is important as it was a missing link early on in many school journeys to implement the model. 5. Restore January 22nd definition of “course of study” - this definition promotes the essence of CBE, which should not be simply about the

	<p>accumulation of credits. CBE is about the demonstration of competencies.</p> <ol style="list-style-type: none"> 6. Restore the portion of the January 22nd definition of "credit" that indicated this also refers to a student's readiness for next learning levels. 7. Restore the January 22nd definition of "differentiation." This version was based on research related to this pedagogical approach, which defined the role of the student versus the role of the teacher in creating this type of approach. 8. Restore the January 22nd definition "equity." This version was vetted through research and leaders in DEIJ work. Removal of specific language to clarify different types of needs in lieu of "other barriers to success" leaves too much to interpretation. 9. Restore the January 22nd definition of "individualization." This version was based on research related to this pedagogical approach, which defined the role of the student versus the role of the teacher in creating this type of approach. 10. Restore the January 22nd definition of "instruction." This version provides flexibility instead of being seen as a traditional, non-preferred approach to pedagogy. The revised definition makes instruction and teaching synonymous. There are differences in these two terms. 11. Restore the January 22nd definition of "mastery." This definition was included because there was feedback from schools that proficiency and mastery were being confused from school to school. 12. Restore the January 22nd definition of "personalization." This version was based on research related to this pedagogical approach, which defined the role of the student versus the role of the teacher in creating this type of approach. 13. Restore the January 22nd definition of "remote learning." This definition was based on updated research and provides a shared understanding of the use of this term across all schools. 14. Restore the January 22nd definition of "rigor." This definition was vetted by national research and consultants who specialize in this area. Rigor is important to the CBE model. Having a shared definition among schools will provide consistency in terms of defining proficiency related to competencies, even when competencies are defined at the local level. 15. Restore the January 22nd definition of "work study practice."
Ed 306.06 Culture & Climate	(b)(1) Suggested change - Review ways in which equity gaps related to academic, social, emotional, and physical needs can be reduced, and develop and implement a plan to address under-performance in these need areas of individuals and groups, using qualitative and quantitative data, to eliminate barriers to learning opportunities.
Ed 306.12 Provisions of Staff & Staff Qualifications	Restore statement (g) related to principal authority to grant a minor assignment to a licensed educator.
Ed 306.14 Student-Educator Ratios (Class Size)	Restore January 22, 2024 draft language related to required class sizes at all grade ranges, including class size limits related to laboratory classes, number of workstations, and the size and design of the area.

Ed 306.16 Career and Technical Education Programs	Recommendation - table an action on this section as the educators have a proposal to combine this section with Ed 306.34 Career & Technical Education Curriculum. This proposal will be presented on April 11, 2024.
Ed 306.17 Alternative Course of Study (Program)	(a) Add the work individualization to the list - "of a student's learning opportunities through individualization, personalization, and differentiation..." Keep "standard school" as this definition exists in RSA 189:24. This also applies to parts (b), (h), and (l) Restore statement (e) from January 22, 2024, draft to link alternative learning plans to duty of a parent RSA 193:1(h)(1-3). Restore
Ed 306.18 Remote Learning (Distance Education)	Restore the option to use remote learning, at the decision of the local school board, when schools are used for civic community events, such as, but not limited to, polling locations, annual school/town meetings, etc. The decision will be based on balance between school safety for students and support partnerships between schools and civic community events. (See January 22, 2024 draft).
Ed 306.24 Assessment	Restore the assessment section as presented in the January 22, 2024, draft document, especially the section on competency-based assessments. Assessment is a key principle of the CBE Model.
Ed 306.19 (was .25) School Psychological Services	Please refer to the detailed document created by various school psychologists who participated in the various educator review sessions. This document is provided as Appendix A to this testimony.
Ed 306.20 Kindergarten Through Grade 8 School Curriculum	Please note: I am still processing all the feedback and suggested language changes for this section and will include further recommendations in my report for April 11th hearing. <ol style="list-style-type: none"> 1. Why is Kindergarten not included in the opening paragraph of this section? Please add. 2. Consider including a consistent definition of play-based learning under part (b) 3. Why is technology & engineering missing from the list for grades 1 through 8? 4. There are many concerns about the ELO section. I am still analyzing all of those in order to present that information at the April 11th hearing. 5. Why the removal of granting high school achievement of competencies leading to high school graduation? 6. Why the removal of the statement related to Holocaust and genocide education no later than 8th grade?
Ed 306.21 High School Curriculum, Credits, and Co-Curricular	Please note: I am still processing all the feedback and suggested language changes for this section and will include further recommendations in my report for April 11th hearing. <ol style="list-style-type: none"> 1. Concern about the general use of learning opportunities versus courses. 2. Concerns about ELO language - analysis still in progress

Programs	<ol style="list-style-type: none"> 3. Concern about the removal of Table 306-1 outlining the minimum courses per content area for consistent high school programs of studies across all NH public high schools - restore the table 4. Restore language related to "credit shall equate to the level of rigor necessary to master competencies.." (statement j) 5. Physical education is missing from the list of required courses in program areas (statement q(5)).
Ed 306.22 Graduation Requirements	<p>Please note: I am still processing all the feedback and suggested language changes for this section and will include further recommendations in my report for April 11th hearing.</p> <ol style="list-style-type: none"> 1. Restore "requirement" versus "expectations" 2. Concern about the reduction of electives from 6 credits to 2.5 credits for students - removal of student agency (choice and voice) 3. Why the silo effect of various social studies courses? Prior to the table outlining new graduation requirements there is this statement: "Encompass a complete body of interrelated student accomplishment and be considered as a whole, not as discrete silos; and..require students to demonstrate their ability to apply and transfer their learning..." Furthermore, state laws indicate that "logic and rhetoric" and "personal finance literacy" shall be integrated with other content areas. Why are these two additional topics placed in separate graduation credit silos? Why the separation of NH and US History? 4. Why the removal of digital portfolios? 5. Why the removal of statements about the value of interdisciplinary learning?

Appendix A - Proposed New Rules for School Psychological Services - Submitted by Educators and State Association

Ed 306.19 Comprehensive School Psychological Services.

- a. If a district employs a school psychologist as an optional service pursuant to RSA 189:49, IV, the standards in (b)-(e), in addition to the requirements below, shall apply:
 1. Nothing in this section shall prevent a school district from contracting services with a qualified school psychologist;
 2. Employing school districts shall ensure that parental consent and student information are protected as required under applicable state and federal law.
- b. Employing school districts shall require that school psychological services are provided by New Hampshire Education Department (NHED) licensed school psychologists in a coordinated, organized fashion, and are deployed in a manner that results in the provision of a comprehensive continuum of services based on this section and The National Association of School Psychologists (NASP) Model for Comprehensive and Integrated School Psychological Services, and the current practice standards established by the National Association of School Psychologists (NASP).
 1. School districts should strive to meet the nationally recommended ratio of one (1) school psychologist to every five-hundred (500) students enrolled. School psychological services shall be available to all students to support their social-emotional, developmental, and academic instruction needs

toward meeting requirements of the Every Student Succeeds Act (ESSA) while utilizing a Multi-Tiered System of Support (MTSS) framework for academics and behavior.

2. Employing school districts shall ensure that an effective program of supervision, evaluation, and professional development of school psychological services exists.
 3. Mentoring shall be available to all school psychologists to an extent sufficient to ensure the provision of effective and accountable services.
 4. Beginning school psychologists in their first year of employment as a school psychologist shall receive a minimum of an average of one hour of direct (i.e. phone, video conference, or in person) mentoring contact per week, on average.
 - a. Mentors shall meet Ed 500 requirements for certification as a school psychologist and have at least 3 years of professional experience as a school psychologist in a school system.
- c. School psychological services include the delivery of a comprehensive range of services to support the academic, social, developmental, behavioral, and mental health needs of students. Scope of service includes the observation, description, evaluation, interpretation, diagnosis, and modification of human behavior through the applications of psychological and educational principles. Through their specialized knowledge in both psychology and education, school psychologists help create safe, healthy, and supportive learning environments that strengthen connections between home, school, and the community. School psychologists provide a continuum of data driven, evidence based, culturally responsive and developmentally appropriate services to support students, families, and other school professionals.

The school psychologist shall provide and evaluate the effectiveness of comprehensive psychological services in the education setting. These services are provided to help children and youth develop academic and behavioral skills through:

1. **Data-Based Decision Making**
Utilize assessment methods for identifying strengths and needs; develop effective interventions, services, and programs; and measure progress and outcomes within a multitiered system of supports. Systematically collect data from multiple sources as a foundation for decision-making at the individual, group, and systems levels, and they consider ecological factors (e.g., classroom, family, and community characteristics) as a context for assessment and intervention.
2. **Consultation and Collaboration**
Apply varied models and strategies of consultation and collaboration applicable to individuals, families, groups, and systems, as well as methods to promote effective implementation of services.
3. **Academic Interventions and Instructional Supports**
Utilize understanding of the biological, cultural, and social influences on academic skills; human learning, cognitive, and developmental processes; and evidence-based curricula and instructional strategies.

4. **Mental and Behavioral Health Services and Interventions**
Utilize understanding of the biological, cultural, developmental, and social influences on mental and behavioral health, behavioral and emotional impacts on learning, and evidence-based strategies to promote social-emotional functioning. In collaboration with others, design, implement, and evaluate services that promote resilience and positive behavior, support socialization and adaptive skills, and enhance mental and behavioral health.
5. **School-Wide Practices to Promote Learning**
Utilize understanding of the systems structures, organization, and theory; general and special education programming; implementation science; and evidence-based, school-wide practices that promote learning, positive behavior, and mental health. In collaboration with others, develop and implement practices and strategies to create and maintain safe, effective, and supportive learning environments for students and school staff.
6. **Services to Promote Safe and Supportive Schools**
Utilize principles and research related to social-emotional well-being, resilience and risk factors in learning, mental and behavioral health, services in schools and communities to support multi-tiered prevention and health promotion, and utilize evidence-based strategies for creating safe and supportive schools. In collaboration with others, promote preventive and responsive services that enhance learning, mental and behavioral health, and psychological and physical safety. Implement effective crisis prevention, protection, mitigation, response, and recovery.
7. **Family, School, and Community Collaboration**
Utilize the principles and research related to family systems, strengths, needs, and cultures; implement evidence-based strategies to support positive family influences on children's learning and mental health; and various strategies to develop collaboration between families and schools.
8. **Equitable Practices for Diverse Student Populations**
Utilize knowledge of individual differences, abilities, disabilities, and other diverse characteristics and their impact on development and learning. Also understand principles and research related to diversity in children and families. Implement evidence-based strategies to enhance services in both general and special education and address potential influences related to diversity. Demonstrate skills to provide professional services that promote effective functioning for individuals, families, and schools with diverse characteristics, cultures, and backgrounds through an ecological lens across multiple contexts.
9. **Research and Evidence-Based Practice**
Utilize research design, statistics, measurement, and varied data collection and analysis techniques. Implement various techniques and technology resources for data collection, measurement, and analysis to support effective practices at the individual, group, and/or systems levels.

10. Legal, Ethical, and Professional Practice
Adhere to ethical, legal, and professional standards.
11. School psychologists shall use assessment findings to diagnose educational and behavioral disorders and to facilitate educational treatment planning.

Appendix B - Aurora Institute Definition of CBE



CompetencyWorks
AN INITIATIVE OF THE AURORA INSTITUTE

What Is Competency-Based Education?

An Updated Definition

WRITTEN BY:
Eliot Levine
Susan Patrick

A NEW DEFINITION OF COMPETENCY-BASED EDUCATION

The field of K-12 competency-based education is expanding, and knowledge is growing. From 2017 to 2019, CompetencyWorks engaged in a multi-stage, participatory process to update the 2011 working definition.

The revised 2019 definition of competency-based education is:

1. Students are empowered daily to make important decisions about their learning experiences, how they will create and apply knowledge, and how they will demonstrate their learning.
2. Assessment is a meaningful, positive, and empowering learning experience for students that yields timely, relevant, and actionable evidence.
3. Students receive timely, differentiated support based on their individual learning needs.
4. Students progress based on evidence of mastery, not seat time.
5. Students learn actively using different pathways and varied pacing.
6. Strategies to ensure equity for all students are embedded in the culture, structure, and pedagogy of schools and education systems.
7. Rigorous, common expectations for learning (knowledge, skills, and dispositions) are explicit, transparent, measurable, and transferable.

A competency-based school or district should implement all seven elements of the definition. Strong implementation also requires policies, pedagogy, structures, and culture that support every student in developing essential knowledge, skills, and dispositions.

ORIGINAL AND REVISED DEFINITIONS OF COMPETENCY-BASED EDUCATION

Original Definition of Competency-Based Education (2011)¹

1. Students advance upon demonstrated mastery.
2. Competencies include explicit, measurable, transferable learning objectives that empower students.
3. Assessment is meaningful and a positive learning experience for students.
4. Students receive timely, differentiated support based on their individual learning needs.
5. Learning outcomes emphasize competencies that include application and creation of knowledge, along with the development of important skills and dispositions.

¹Sturgis, Patrick, & Pittenger, 2011



Revised Definition of Competency-Based Education (2019)

1. Students are empowered daily to make important decisions about their learning experiences, how they will create and apply knowledge, and how they will demonstrate their learning.
2. Assessment is a meaningful, positive, and empowering learning experience for students that yields timely, relevant, and actionable evidence.
3. Students receive timely, differentiated support based on their individual learning needs.
4. Students progress based on evidence of mastery, not seat time.
5. Students learn actively using different pathways and varied pacing.
6. Strategies to ensure equity for all students are embedded in the culture, structure, and pedagogy of schools and education systems.
7. Rigorous, common expectations for learning (knowledge, skills, and dispositions) are explicit, transparent, measurable, and transferable.

BELIEF STATEMENTS

Practitioners and policymakers need a concise definition of competency-based education to enable clear communication and inform action. Realizing the promise of competency-based education systems also requires examining a more extensive set of essential beliefs. The following belief statements complement and contextualize what we mean by the definition of competency-based education.

We believe:

- Competency-based education is a replacement of the systems, structures, and pedagogies of the traditional system.
- Competency-based education is driven by the equity-seeking need to transform our educational system so all students can and will learn through full engagement and support and through authentic, rigorous learning experiences inside and outside the classroom.
- Equity is a central goal of advancing competency-based education systems.
- Communities that aspire to achieve equity must work toward implementing all elements of a competency-based education system.
- All students can learn and must be challenged, believed in, and supported to achieve deep learning aligned with common, high expectations across the education system.
- Educators need to organize innovative learning environments around the needs of students who learn in different ways and in different time frames.
- Students need to learn academic knowledge and the skills and dispositions to apply it (such as growth mindset, self-regulation, social-emotional learning, and habits of success).
- Learning happens anytime and anywhere.
- Deeper learning is collaborative and socially embedded.
- Transparency of learning expectations and assessment results is essential for creating a culture of learning and accountability.

What do students experience in a competency-based school?

Below are examples of experiences that every student should have in a well-developed personalized, competency-based system.

1. I am fully supported in developing academic knowledge and skills, the ability to apply what I have learned to solve real-world problems, and the capacities I need to become an independent and lifelong learner.
2. I feel safe and am willing to put forward my best effort to take on challenging knowledge and skills because I have a deep sense of belonging; feel that my culture, the culture of my community and my voice is valued; and see on a daily basis that everyone in the school is committed to my learning.
3. I have the opportunity and support to learn the skills that allow me to take responsibility for my learning and exercise independence.
4. I have access to and full comprehension of learning targets and expectations of what proficiency means.
5. I have the opportunity to learn anytime, anywhere, with flexibility to take more time when I need it to fully master or go deeper and to pursue ways of learning and demonstrating my learning that are relevant to my interest and future.
6. I am able to own my education by learning in ways that are effective for me with the support that allows me to be successful.
7. I receive timely feedback, instruction, and support based on where I am on my learning progression and my social-emotional development to make necessary progress on my personalized pathway to graduation.
8. My learning is measured by progress on learning targets rather than level of participation, effort, or time in the classroom.
9. Grades or scoring provide feedback to help me know what I need to do to improve my learning process and reach my learning goals.
10. I can advance to the next level or go deeper into topics that interest me as soon as I submit evidence of learning that demonstrates my proficiency.

Resource Link:

<https://aurora-institute.org/wp-content/uploads/what-is-competency-based-education-an-updated-definition-web.pdf>

From: [Maggie Forrestall](#)
To: [Adams, Angela](#)
Subject: Minimum Standards for Public School Approval: Teacher Testimony
Date: Monday, April 1, 2024 10:33:32 PM

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Hello Ms. Adams,

I'd like to submit the following public testimony in regards to the proposed Ed 306 Rules:

I agree with experienced educators across the state that these proposed rules do not improve the quality of education in public schools. In fact, they weaken, distort, and dilute it to a worrisome degree. The language is very vague and misleading. These proposed rules will lead to increased inequity in school funding within our state. These proposed rules will also result in putting more power in the hands of outside companies that do not have New Hampshire's best interests and students' best interests in mind.

When it comes specifically to the Social Studies section of the proposed Ed 306 Rules:

I agree with many educators from across the state that the proposed rules omit many of the ways of knowing that are unique to the field of Social Studies. They undermine the rigor and academic integrity of this discipline. This seems deeply problematic, given that Social Studies instruction is responsible for providing our community with the foundation of our ability to function as a successful democratic society.

It is ironic that the knowledge, understanding, skills, and ways of knowing that are unique to this discipline are exactly the skills that we need to utilize to improve the proposed rules. This is exactly why this work matters!

I would strongly recommend utilizing nationally recognized resources such as the C3 framework in order to add deeper, more meaningful, and more rigorous requirements for Social Studies knowledge, skills, and dispositions that all students deserve the opportunity to develop. We would like to strengthen the language of the proposed rules to reinforce the importance of Social Studies instruction having dedicated, required time at each academic level, not just high school. Finally, we would like to establish stronger connections in the instructional requirements across elementary, middle, and high school to demonstrate the importance of developing a progression of learning opportunities that build gradually over time. All of these changes better reflect best practices within this discipline, as well as our commitment to prepare students more holistically for successful participation in a democratic society.

Some questions that I'm still wondering about the Social Studies standards:

Why do the proposed rules not reflect best practices for Social Studies instruction, as supported by numerous national organizations and teacher preparation programs?

Why are we still waiting for the Social Studies framework to be updated after all these years?

Do these Social Studies rules have any grounding or basis without established state academic standards?

Why is there no example of Social Studies competencies and state academic standards to support local districts in this work like there is for other content areas?

Even though we don't assess this subject area in state standardized tests, and even though this discipline doesn't always lend itself well to standardization, why can't we expect more of our Social Studies instruction?

Why can't the model from Holocaust and Genocide Studies serve as an exemplar for all other content areas for how to center teacher expertise when revising these rules?

Doesn't New Hampshire expect better of itself? Why not hold ourselves to a higher standard rather than a lower one?

What risks are we taking as a society by sticking with the status quo of the proposed rules, as currently written?

Please consider my testimony in this critical decision-making process, along with the testimony of hundreds of other concerned educators and community members who are deeply invested in the health and wellbeing of our students and our state community. Thank you for your consideration!

Sincerely,
Maggie Forrestall
Grade 5 Teacher
James Faulkner Elementary School
Stoddard, NH

From: [Kim Marie Fudge](#)
To: [Shea, Julie](#)
Cc: [Adams, Angela](#)
Subject: Minimum Standards Overhaul
Date: Friday, April 26, 2024 3:20:13 PM

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Good Day,

As a retired public school educator, former special needs advocate, and parent of grown children who are graduates of a rigorous public education, I find the proposed standards overhaul to be an assault on a foundational institution of our democracy.

One does not need to have the experience that I have had to notice the gutting of the standards. The visual appearance due to the amount of red lines throughout the document says it all.

Despite the visual appearance and its near foregone conclusion, I went ahead anyway and read the document.

The proposal does away with nearly every aspect of public education, including local control over schools, especially in the area of policy.

It eliminates the words "instructional" (for materials and curriculum), "certified" for school personnel, has no play based learning in kindergarten (ignoring young child development completely), eliminates facility requirements down to even having custodians, never mind healthy and safe buildings, and essentially guts school psychologists, and eliminates Holocaust education.

It also eliminates guided reading instruction, an essential and evidenced-based component to any reading program. Guided reading instruction not only helps students with basic strategies such as literal comprehension. It also provides instruction to any and all students in the various levels of reading comprehension such as inferencing, synthesis, and evaluation.

The word "opportunity" seems to take the place of "requirement" and the document eliminates the words "program" and "education" from many subjects.

It seems like the department is proposing Gestapo-like tactics when it says that the "department shall appoint a qualified individual to conduct school audits to verify the information and documentation submitted to verify that a school complies with Ed 306."

There seems to be no requirement for co-curricular programs. I cannot even imagine any school experience without these for students.

It appears that CTE programs are being gutted in high schools. CTE education offers those students who are not college bound specialized instruction and even experience in these professions. I should know. One of my children has been working in the trades for nearly 14 years. His entire education was well-rounded in the academic as well as the vocational sphere.

He can analyse any text, solve a math problem (his trade actually requires this skill), speak intelligently about history, think critically, and lay pipe because of the rigorous standards the state required.

It is unfortunate that the department is choosing this path for NH families. It does not bode well for any of our citizens and a future workforce for this state. I hope you will consider my comments and amend the proposal. We don't need minimum standards. We need maximum standards with evidence-based instruction delivered by professional educators.

Sincerely,

Kim Fudge
Conway

From: [Kate Harrington Segal](#)
To: [Adams, Angela](#)
Cc: [Christine Downing](#); [Mark MacLean](#); [Susan Moore](#)
Subject: 306 Testimony
Date: Friday, March 29, 2024 9:14:23 AM

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Good morning Angela,

Educators across the state of New Hampshire participated in content review sessions for the proposed 306 rules. My testimony after having participated in the March 28, 2024 session located at the North Country Educational Services in Gorham, NH, facilitated by Christine Downing is as follows:

Self-guided, canned programs are designed for a large number of students and not tailored to a specific student's learning needs. An undefined learning opportunity can not replace a licensed teacher actively engaged in targeting individual student instruction using not only summative and formative assessments, but also their experience, education, empathy, and understanding of students, in terms of academics, behaviors, and social emotional learning needs.

Thank you for your consideration.

Be well,

*Kate Harrington Segal, MEd, CAGS
Superintendent SAU #35*

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From: [Hawkins, Lisa](#)
To: [Adams, Angela](#)
Subject: ED 306 proposed minimum standards
Date: Monday, April 1, 2024 6:48:29 PM

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Dear Committee Members,

The changes that are being proposed by the New Hampshire State Department of Education to the minimum standards for quality education would be an extremely detrimental action, worse than irresponsible and negligent. The rules, as proposed by the committee, would allow local school boards to severely limit or eliminate essential parts of a basic education. This would increase inequities between and within districts and lower standards for schools, students and teachers in our state. Please adopt ED 306 minimum standards that include:

- Definitions informed by peer-reviewed academic studies.
- Language and definitions that advance CBE and support ongoing CBE efforts by providing a framework for making local decisions, continued growth and innovation.
- Language and definitions that ensure equitable access to a wide range of engaging opportunities.
- Language and definitions that ensure high standards and quality programming for students and teachers.
- A minimum number of high school courses that ensure that all approved schools are required to offer New Hampshire's students with diverse choices in their academic journeys that provide them with new learning experiences, spark their personal passion for continuous learning, help shape and inform their personal plans and provide the required course of study for a New Hampshire High School diploma.
- Class sizes that assist districts in creating budgets, allocating resources (personnel and supplies) and crafting schedules where students are able to receive personalized, supportive, engaging, expert and diverse learning.

Thank you,

Lisa Hawkins
Spanish Teacher Grades 6-8
Keene Middle School



 *ness message*

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From: [Cindi Hodgdon](#)
To: [Adams, Angela](#)
Subject: RE: Upcoming Public hearing April 2 and 11, 2024 of the NHDoe Ed 306 Administrative Rules for Public School Approval and changes to the Minimum Standards for Public School Approval.
Date: Monday, April 1, 2024 3:03:51 PM

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Dear Angela Adams:

My name is Cindi Hodgdon and I am a NH state World Language Educator (German Teacher) who resides in Hillsborough County. I am writing to urge you to review the comments and suggested wording submitted by Christine Downing per the educator review sessions. Close to 300 certified teachers reviewed these proposed changes and have put forth their testimony.

Here are just a few concerns that the New Hampshire World Language Educators would like to share with you in hopes that you will revise these Rules and support a full scope for an inclusive and competent public education program.

1. Aligning all standards with National Standards.
2. Reducing student electives from 6 to 2.5 is a danger and detriment to students and educators
3. Removal of career ed. programs will have a large impact on hundreds of students statewide.
4. Alternative courses of study: needs review to maintain quality curriculum and instruction.
5. MOST IMPORTANTLY - Allowing the VOICES of the NH educators to be in the decision-making process!

We as educators have deep concerns regarding: Requirements vs expectations, Rhetoric like may vs shall, Program vs curriculum, Student right to choose electives , Removal of class size capping, Local vs State control, Defining Adequate Education, ALL students to have a Personal Learning Plan (PLP), Accountability.

Sincerely,

Cynthia Hodgdon

[REDACTED]

Conval School District

[REDACTED]

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Karl Hubner

[REDACTED]
Hampstead, N.H. 03841

First, I want to thank the board members for their service. It is not an easy job you do. I myself am a local school board member, as well as an instructional leader in one of the largest districts in the state, and a member of the executive board for the NH Social Studies Council.

As I am involved in education in multiple ways, I am surprised that I had not heard of the overhaul of the minimum standards until recently. This may be the largest change in educational policy for this state in my lifetime. I am not against change; in fact, I do think NH education has stagnated, but I truly don't understand these changes. I believe that if such significant changes are to be made, we as taxpayers, should understand why. To me, the process of getting that reasoning from whoever has made the changes has been lacking. The only information I can find online is from webinars by educational advocacy groups. I would like to hear from those making the changes the reason for each of the current rules and why they believe they need to be changed.

As a social studies teacher for two decades, I have watched the ability of students to critically think, argue, and debate weaken. Post-COVID, this has increased, and now, with the evolution of Artificial Intelligence, I find it even more important that we teach our kids how to assess information. I was hopeful about the new state's emphasis on civics and the inclusion of logic and rhetoric into the required curriculum. I now feel like this positive momentum for our social studies teachers is in danger because of what seems like the lowering of our standards and expectations for our future citizens.

For me, being an American is about giving every student an opportunity to succeed. When I was going through school 30 years ago, in the same town I live in now, I truly believe we had that. Now, as a school board member, I feel the burden of providing the same great education. Even with an educational background, my first year on the board was a challenge. I relied on state policy, state organizations, and my fellow board members to get up to speed. The state policies also gave us a road map, but it feels now like the guard rails are being removed, putting our students' futures in danger.

As an educational researcher who examined how to spend money most effectively in schools, early intervention is the best place to put your money. I cannot understand why we are

removing class size caps in general, but most specifically at the elementary level. I fear a newly elected school board may make changes that could adversely impact a district for years and for young children their entire lives. We, as Americans, should make sure guardrails are in place so this never happens. I love local control, but we need some guidance. You are removing those guard rails, the protections for our future generations.

I am guessing that some of you are in business so let me put it to you in a different way. As an economics teacher, I taught the basics of business, and I would ask you the question does any successful large business scrimp on research and development? Our students are the next wave of America, the future of our great enterprise. I have already heard from many in the business world talk about how students are unprepared. Why, then are we lowering our standards, the literal minimum for our students and schools?

I will wrap up by saying students know when their community does not care about them, and it kills their fire for learning. I don't understand why these changes are being made, but it feels like we are removing our expectation of greatness. When I went to school in the 1980s we were told we could do anything. We are in danger of killing students' hope. The hope that they can be a part of the shining city on the hill that is our great state and nation. Unless someone can publicly explain in depth how these changes uphold that legacy, I would implore you not to enact them. Times have changed, but I don't believe our American values should. Thank you

From: [Jocelyn Judge](#)
To: [Adams, Angela](#)
Subject: Ed 306 review
Date: Tuesday, April 2, 2024 11:22:05 AM

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April 2, 2024

RE: Upcoming Public hearing April 2 and 11, 2024 of the NHDOE Ed 306 Administrative Rules for Public School Approval and changes to the Minimum Standards for Public School Approval.

Dear Angela Adams:

My name is Jocelyn Judge and I am a NH state World Language Educator at Inter-Lakes Middle High School. I resides in Belknap County. I am writing to urge you to review the comments and suggested wording submitted by Christine Downing per the educator review sessions. Close to 300 certified teachers reviewed these proposed changes and have put forth their testimony.

Here are just a few concerns that the New Hampshire World Language Educators would like to share with you in hopes that you will revise these Rules and support a full scope for an inclusive and competent public education program.

1. Reducing student electives from 6 to 2.5 is a danger and detriment to students and educators
2. Removal of career ed. programs will have a large impact on hundreds of students statewide.
3. Alternative courses of study: needs review to maintain quality curriculum and instruction.

We as educators have deep concerns regarding: Requirements vs expectations, Rhetoric like may vs shall, Program vs curriculum , Student right to choose electives , Removal of class size capping , Local vs State control , Defining Adequate Education, ALL students to have a Personal Learning Plan (PLP), Accountability.

Sincerely,

Jocelyn Judge

[REDACTED]
[REDACTED]

Inter-Lakes School District

[REDACTED]
[REDACTED]

**Testimony Submitted by Dr. Sydney Leggett
SAU 32 and 100
April 3, 2024**

“Every kid, everywhere, and all means all.”

I imagine even if you haven’t seen the film, you’re familiar with the phrase “Everything Everywhere All At Once.” Here, I propose a similar phrase – Every kid. Everywhere. All means all.

Every Kid:

Even though kids often don’t like rules, kids would like these – they offer the guarantee that every kid has the same access and opportunity to make their life what they want and need it to be. More than anyone, kids know that one size does not fit all. Offering a strong, adequate education to EVERY KID means that student differences can be honored and appreciated while there are common standards across the state to ensure quality.

Every kid deserves high quality standards with elements such as required program elements, class size limits, certification standards for educators, and differentiation for all.

Everywhere:

As many across New Hampshire are already aware, funding our schools falls on the backs of local taxpayers. Our communities and schools are victims of the zipcode lottery and budgets are created by balancing the will and the tax burden on local taxpayers. Having just completed another budget season in NH I can attest to how hard this is on our communities. Changes to the 306s in terms of what is required vs what is optional will make this much worse, depending on where you live.

In the current rules, a New Hampshire high school diploma has a fundamental consistent meaning, that the student has achieved the same requirements for an adequate education as every other New Hampshire school. Eliminating common adequacy for high standards puts this in jeopardy.

As one of my colleagues recently stated, the 306s were never intended to be something you trip over when you walk into the room. They are intended to be rigorous, meaningful, and something NH should feel proud of.

Please be sure to only approve 306 rules that create a strong foundation EVERYWHERE.

All Means All:

So, if the proposed rules get approved, will a NH high school diploma mean the same thing among our state's schools? Will it still mean the same thing in other states? To colleges and universities? To employers? Weakening the requirements of the 306s widens the gap to access and opportunity, putting every child's future in jeopardy. As an educator, I want everyone to see a NH diploma and know that it means quality.

Public schools are the great equalizer and these rules hold us to that. The proposed rules are written to open the door to businesses to sell credit. For the record, I am completely in favor of business partnerships, which happen all over the state at no cost through ELOs or extended learning opportunities. In fact, the high school where most of our district students attend have well over 300 of these business connections per year – and they are available to all, for free.

Kids are not customers. We cannot allow any family's financial resources to dictate an education.

Our public schools need to be the level-playing-field sanctuary that protects our future. It's critical that all across NH we support rigorous, fair, and comprehensive education rules that keep our state among the best in the nation. Our kids and our communities deserve nothing less.

I believe we've all made a promise to NH kids, to – once again – serve every kid, everywhere, when all means all.

I ask the State Board to hold to this promise.

April 3, 2024

NH State Board of Education
% Andrew Cline, Chair
Andrew.C.Cline@affiliate.doe.nh.gov

Subject: ED306 Proposed Revisions

Dear Members of the NH State Board of Education,

The ED306 Rules, Minimum Standards for Public Schools Approval, are the most important standards we have requiring that a high quality education be provided for the students of our great state. The review and revision of these standards are crucial not only for the more than 160,000 students currently enrolled in our public schools, but also for the students that will be enrolled in the future. These standards not only impact the aforementioned students, but also the hard working and dedicated employees, as well as the supportive and entrusting families and communities that value the importance of having the highly regarded public education system the Granite State is renowned for across the United States. It is extremely important, to the point of mission critical, that we get it right, now.

On June 8, 2023, I submitted the attached letter outlining concerns with the initial draft of revisions to the rules. That letter was written in response to a public presentation facilitated by members of the "306 Task Force" held in Keene on May 11, 2023. In that letter, it was acknowledged that the rules needed to be updated. I do not believe that anyone will argue with that. The letter also highlighted some areas to focus on, specifically, the process, the proposal and moving forward. These areas are still areas that need to be addressed prior to adopting any changes that are now being proposed, however, I am going to focus on the moving forward part today.

Moving Forward: Clear definitions and expectations that advance student growth by requiring equitable access, quality programs and high standards in all of our public schools for all of our students is within our ability and enable us to ***"ensure that every individual acquires the skills and knowledge to succeed in a competitive global economy and thrive as a 21st century citizen."*** They will enable us to support your mission statement at the local level.

I indicated that the biggest obstacle in moving forward was strengthening trust last June. Sadly, that continues to remain the biggest obstacle one year later. Nearly two and a half years of work from the "306 Task Force" that included several listening

sessions from around the state was completely undone with the submission before you that was significantly altered prior to presenting it to this Board. In fairness, there were some very logical improvements that were made that didn't change intent. Unfortunately, there were also some major language changes, including complete deletions, that drastically downgraded the degree of standard that will negatively impact and obliterate equity for our students, staff, families and communities across the state.

The institution of public education should be free of **ALL** political agendas. Our minimum standards are not a playground to advance the widely observed playbook from one party or another. These are children's futures and people's lives that are being manipulated using backdoor tactics that further widen the gap of trust and mistrust. The one main difference between the initial proposed changes last spring and now is that a papertrail now exists.

I urge you to carefully consider the impact the proposed changes will have now and in the future for our students by:

- Building trust and confidence in our public school system across the state and around the country by ensuring our standards are of value and reflect best practice.
- Enhancing our standards, not diminishing them.
- Requiring equitable access, quality programs and high standards in all of our public schools for all of our students.
- Continuing to advance the work we are doing with regard to competencies.
- Supporting local decision makers for their innovation in providing a diverse array of educational opportunities that meet and exceed minimum standards.
- Setting expectations that ensure class sizes are manageable in order to provide the quality attention students need to succeed.
- Ensuring that a high school diploma is equitable in achievement across the state, regardless of where a student earns it.
- Nurturing the passion and energy our students and staff bring to school everyday, not stifling it with watered down standards.
- Holding our schools accountable and supporting them when they stumble.
- Listening to the experts that have made a career in education, not the voices that are a temporary stop in the field and asking them to help you get it right.
- Listening to the many people that are speaking up. In my communities, **90.6%** of 339 respondents **DO NOT** support the proposed changes that are before you.

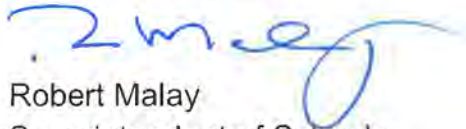
Consider what these changes will mean to members of your family, your friends and their children, your neighbors and your community, now, five years from now, 10 years

from now and beyond. Help lead New Hampshire back to the #1 US News and World Report ranking we held in 2017 for our pre-K to 12 education system.

And lastly, on behalf of the communities I serve, I urge you to honestly ask yourselves if these proposed changes align with your vision statement “...**to provide a world class, personalized, student-centered education in a flexible, innovative learning environment that promotes active engagement to maximize the potential in every individual.**” The document you are considering clearly answers that question and it undeniably does not.

We are trusting YOU to get it right.

Yours in Education,



Robert Malay
Superintendent of Schools
SAU 29



Cc: School Communities of SAU 29 Member Districts
School Communities of Keene School District Sending Districts

June 8, 2023

Andrew Cline
Chair, NH State Board of Education
Andrew.C.Cline@affiliate.doe.nh.gov

Frank Edelblut
Commissioner, NH DOE
Louis.F.Edelblut@doe.nh.gov

Fred Bramante
Chair, Committee to Revise 306 Rules
fbramante@nccbl.org

Subject: ED306 Proposed Revisions

Gentlemen,

I am providing you with a working copy of the concerns and recommendations ([Linked Here](#)) that surfaced during and after the presentation of the proposed changes to the ED306 Rules in Keene on May 11, 2023. This was done by adding an additional column to the "side by side" document that has circulated throughout the state and is currently available on the department's website.

Some of the feedback was collected in a survey format and the raw data is also included ([Linked Here](#)) for your review as well. In order to be fully transparent, this document will be shared with our community stakeholders as well. I have committed to our folks to compile their input and to ensure we have documented it.

During the presentation we had just under 100 participants combined in person and viewing the live stream. More than half of the participants were in person. Some of this feedback was shared immediately following the session with the team that was present on that evening. Some of the feedback will be the first time they have seen it. Regardless of that, I have observed the team as being receptive to input and considerate of how to best move forward.

With that, our primary concerns can be summarized into the following categories:

1. Process
2. Proposal
3. Moving Forward

The Process: It is hard to argue that the process to date is without flaw. Two years of work in isolation by a committee that omitted critical participation and complete transparency screams extreme caution now. The State Board of Education correctly put on the brakes to slow the

glaringly obvious missteps down by not entering rulemaking as was anticipated in April. However, there continues to exist the belief that the current "listening sessions" will not amount to anything more than just a check in the box to say it was done. This is a significant problem.

The Proposal: The proposed changes did a tremendous job of organizing the 306 expectations into a more coherent manner that makes sense and creates a better flow for understanding. The 306 rules do need updating and many of the recommendations in the proposed changes are commendable. However, there exists ambiguities, inconsistencies, omissions and insertions, that again, are pause for concern, throughout the proposal. In turn, this will yield to confusion for districts around the state upon implementation, most notably around equity and fairness for all students. There are also hints of highly politicized legislation that has failed to pass, sprinkled throughout the proposal such as school choice and education freedom accounts as well as the parental bill of rights. Political agendas should be removed from the proposal.

Moving Forward: The biggest obstacle moving forward is strengthening trust. It is an unfortunate reality that party agendas have compromised the integrity of an institution that has long held the trust of the public, but it is the reality. Our feedback is NOT intended to prevent change. Our intent is to ensure that when change does happen, it considers the full magnitude of its effect on the people that we serve and adapts accordingly. We recognize that changes of any type will have both positive and negative perceptions from those that are impacted. It is our duty to consider all of those perceptions prior to and during the decision making process.

If the goal is to create the best possible rules for our schools, our students, our staff and our state, then there must be a shift in **the process** immediately. The 306 Task Force has completed what they were contracted to do, BUT, the process is not complete. The "listening tour" is a step in the right direction, but there is no transparent measure in place to openly vet the input and feedback that is being submitted. Here are the steps that need immediate consideration and action:

1. Reconstitute the 306 Task Force - The new membership should include some members that have been on the committee from the beginning, but absolutely must include, at the minimum:
 - a. Current practicing and certified classroom teachers.
 - b. Current practicing and certified administrators at both the building and district level.
 - c. Current elected school board members.
 - d. Current students.
 - e. Current parents.
2. Increase Transparency - Learn from the missteps of yesterday. Create broader awareness of what is happening and when.
 - a. Post agendas and minutes.
 - b. Post drafts.
 - c. Create an open and accessible question and answer document and post it.

- d. Share all of the feedback collected from the "listening tour" publicly.
 - e. Post a timeline.
3. Above all, **DO NOT** politicize public education. The biggest reward for educators is observing students reach their full potential. The innocence in that one silver lining is what we have. Using our children as pawns for ulterior reasons is shameful and unethical at best. Allow the professionals to be the experts, support them and applaud them for their efforts.

It is our belief that the rules do need to be updated and reflect best practices and what we value, as a state, for the fundamental right of education for our children. I have put forth a recommendation to the Chair of the Task Force to include a current practicing and certified teacher. I know that he has reached out to the teacher that I recommended. Additionally, I would like to offer my assistance with this effort moving forward as you feel may be appropriate. This is our opportunity to make the State of New Hampshire the envy of the country because we did it right!

Yours in Education,

/rmalay/

Robert Malay
Superintendent of Schools
SAU 29
rmalay@sau29.org

Cc: School Communities of SAU 29 Member Districts
School Communities of Keene School District Sending Districts

New Hampshire Department of Education

Current Administrative Rule	Proposed Administrative Rule	Commentary	Question/Concern or Recommendation
Ed 306.01 Applicability. In order to be an approved school, public schools, and public academies shall meet the applicable criteria established in these standards:	Ed 306.01 Applicability. In order to be an approved school, public schools, and public academies shall meet the applicable criteria established in these standards:	No Change	
(a) Except as provided in (b) below, a public school shall be approved as an elementary school if it contains any of the grades kindergarten through 8 and meets the rules applicable to all schools and to each elementary school;	(a) Except as provided in (b) below, a public school shall be approved as an elementary school if it contains any of the grades kindergarten through 8 and meets the rules applicable to all schools and to each elementary school;	No Change	Grade levels or learning levels?
(b) As determined by vote of the local school board, any combination of the grades 4 through 8 may be organized as a public middle school, and so approved if it meets the rules applicable to all middle schools; and	(b) As determined by vote of the school board, any combination of the grades 4 through 8 may be organized as a public middle school, and so approved if it meets the rules applicable to all middle schools; and	Removed the word local in this instance (and others) as the word local is already used in the definition of school board in Ed 306.04	Grade levels or learning levels?
(c) A public school or a public academy shall be approved as a high school if it contains any of the grades 9 through 12 and meets the rules applicable to all schools and to each high school	(c) A public school or a public academy shall be approved as a high school if it contains any of the grades 9 through 12 and meets the rules applicable to all schools and to each high school.	No Change	Grade levels or learning levels?
Ed 306.02 Definitions. Except where the context makes another meaning manifest, the following words have the meanings indicated when used in this chapter:	Ed 306.02 Definitions. Except where the context makes another meaning manifest, the following words have the meanings indicated when used in this chapter:	No Change	
(a) "Acknowledgement of achievement" means when a student has demonstrated achievement of district competencies and or graduation competencies consistent with RSA 193-C:3;	(a) "Acknowledgement of achievement" means when a student has demonstrated achievement of competencies at a proficient level associated with a program or course of study;	Revised language	
(b) "Career and technical education" means organized educational activities that:	(b) "Career and technical education" means organized educational activities that offer a sequence of learning opportunities that:	Revised language	
(1) Offer a sequence of courses that: a. Provides individuals with coherent and rigorous content aligned with challenging academic	(1) Provide individuals with coherent and rigorous content aligned with challenging academic standards and relevant technical knowledge and skills needed to prepare for further education and	Revised language	

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<p>standards and relevant technical knowledge and skills needed to prepare for further education and careers in current or emerging professions:</p> <p>b. Provides technical skill proficiency, an industry-recognized credential, a certificate, or an associates degree; and</p> <p>c. Might include prerequisite courses, other than a remedial course; and</p>	<p>careers in current or emerging <i>vocational fields</i>; and</p> <p>(2) Provides technical skill proficiency, an industry-recognized credential, a certificate, or an associates degree;</p>	<p>Removed paragraph (c) and renumbered</p>	
<p>(2) Include competency-based applied learning that contributes to the academic knowledge, higher-order reasoning and problem-solving skills, work attitudes, general employability skills, technical skills, and occupation specific skills, and knowledge of all aspects of an industry, including entrepreneurship, of an individual;</p>		<p>Removed paragraph (2)</p>	
<p>(c) "College and career readiness" means alignment with the knowledge, skills, and work-study practices students will need to enter and succeed in postsecondary opportunities – whether college or career;</p>		<p>Removed paragraph (c)</p>	
<p>(d) "Competencies" means student learning targets that represent key content-specific concepts, skills, and knowledge applied within or across content domains. Specific and required types of competencies include district competencies and graduation competencies;</p>	<p>(c) "Competencies" are statements of the knowledge and skills that define what a student will be able to do as a result of a specific set of learning opportunities;</p>	<p>Renumbered Revised language</p>	<p>(c) "Competencies are statements of specific learning targets of the knowledge and skills that define what a student will be able to demonstrate;</p>
	<p>(d) "Competency based assessment" means an assessment of student proficiency with regard to one or more competencies;</p> <p>(e) "Credit" means the official record that a student has demonstrated the competencies associated with a program or course of study;</p>	<p>New definition added Revised language</p>	
<p>(e) "Credit" means the record keeping structure that is awarded to a student who demonstrated achievement of graduation competencies organized around the specific credit;</p>			

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<p>(f) "Department" means the New Hampshire department of education;</p>	<p>(f) "Department" means the New Hampshire department of education;</p>	<p>No change</p>	
<p>(g) "District competencies" mean specific types of competencies that are common across the district and organized in developmental progressions that lead to achievement of graduation competencies;</p>		<p>Removed paragraph (g)</p>	
<p>(h) "Educator" means any professional employee of any school district whose position requires certification by the state board pursuant to RSA 189:39. The term includes administrators, specialists, and teachers;</p>	<p>(g) "Educator" means <i>administrators, educational specialists, instructional specialists, teachers, paraeducators, educational interpreter/translators, school nurses, and any other individuals credentialed by the state board of education;</i></p>	<p>Revised language to ensure consistency with educator credential definitions in other state regulations</p> <p>Renumbered</p>	<p>Can this be simplified so that it remains consistent with the other state regulations without creating a list that will likely evolve over time?</p>
<p>(i) "Extended learning" means the primary acquisition of knowledge and skills through instruction or study outside of the traditional classroom methodology, including, but not limited, to:</p> <ol style="list-style-type: none"> (1) Independent study; (2) Private instruction; (3) Performing groups; (4) Internships; (5) Community service; (6) Apprenticeships; and (7) Online courses; 	<p>(h) "Extended learning" means <i>the personalized learning process that allows for demonstration of competencies through means outside of the traditional classroom;</i></p>	<p>Revised language</p> <p>Renumbered</p>	<p>Please provide consistency throughout the document as "Extended Learning" and "Learn Everywhere" create confusion.</p>
<p>(j) "Graduation competencies" means specific types of competencies that are common across the district and define learning expectations for each student for graduation from high school;</p>		<p>Removed paragraph (j)</p>	<p>Please confirm why this definition was removed.</p>

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<p>(k) "Instructional time" means the period of time during which pupils are actively working toward achieving educational objectives under the supervision of an educator or other staff member; "Learning Level" (Not included in your definitions)</p>	<p>(i) "Instructional time" means the period of time <i>in the school day during which a school is offering instruction</i>; "Learning Level" (Not included in your definitions)</p>	<p>Revised language Renumbered "Learning Level" (Not included in your definitions)</p>	<p>Please define this term and what it will mean in practice as it is used throughout the document.</p>
<p>(l) "Mastery" means a high level of demonstrated proficiency with regard to a competency; (m) "Nutrient dense foods" means those foods that provide substantial amounts of vitamins and minerals and relatively fewer calories as identified and defined by 7 CFR Part 210.10; (n) "Nutrient density of foods" means the amount of a specific nutrient in a food per 100 calories of that food as defined in 7 CFR Part 210.11;</p>	<p>(j) "Nutrient dense foods" means those foods defined by 7 CFR Part 210.10; (k) "Nutrient density of foods" means the amount of a specific nutrient in a food as defined in 7 CFR Part 210.11;</p>	<p>Moved to paragraph (o) below Streamlined language for consistency with federal statute Renumbered Streamlined language for consistency with federal statute Renumbered</p>	
<p>(o) "Nutrition targets" means the specific number and types of food that a student selects. The targets are the scientific bases of the standards for menu planning. Targets provide the foundation for setting meal requirements which encompass meal patterns and other specifications for school menu planning purposes; (p) "Personalized learning" means a process which connects learning with learner's interests, talents, passions, and aspirations including actively participating in the design and implementation of their learning;</p>	<p>(l) "Nutrition targets" means the specific number and types of food that a student selects. The targets are the scientific <i>basis</i> of the standards for menu planning. Targets provide the foundation for setting meal requirements which encompass meal patterns and other specifications for school menu planning purposes; (m) "Personalized learning" means a process which <i>encourages student curiosity by connecting</i> learning with learner's interests, talents, passions, and aspirations including actively participating in the design and implementation of their learning;</p>	<p>Corrected inaccurate language Renumbered Renumbered</p>	
<p>(q) "Proficiency" means the minimum level of performance required to satisfy the acknowledgment of a competency, and is distinguished from mastery, which is a level of performance that exceeds proficiency;</p>	<p>(n) "Proficiency" means the <i>minimum student performance required to satisfy the acknowledgment of a competency, and is distinguished from mastery, which is a level of performance that exceeds proficiency</i>;</p>	<p>Revised language Renumbered New definition added</p>	<p>Who distinguishes the performance level? A certified educator?</p>

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<p>(4) "Portion size" means the amount of food that will ensure each serving will be the appropriate size and that a recipe will produce the expected number of servings; and</p>	<p>(d) "Portion size" means the amount of food that will ensure each serving will be the appropriate size and that a recipe will produce the expected number of servings;</p>	<p>Renumbered</p>	
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<p>(r) "Work study practices" means those behaviors that enhance learning achievement and promote a positive work ethic such as, but not limited to, listening and following directions, accepting responsibility, staying on task, completing work accurately, managing time wisely, showing initiative, and being cooperative.</p> <p>Ed 306.03 <u>Statutory and Policy Requirements.</u></p>	<p>(p) "School board" means the local school board of a district established in RSA 189:1-a;</p> <p>(q) "State board" means the state board of education established in RSA 21-N:10; and</p> <p>(r) "Work study practices" means those behaviors that enhance learning achievement and promote a positive work ethic such as, but not limited to, listening and following directions, accepting responsibility, staying on task, completing work accurately, managing time wisely, showing initiative, and being cooperative.</p> <p>Ed 306.03 <u>Statutory and Policy Requirements.</u></p>	<p>New definition added</p> <p>New definition added</p> <p>renumbered</p>	
<p>(a) The local school board shall be responsible for obtaining an up-to-date copy of state education laws, one copy of which shall be distributed free of charge to each school administrative unit by the department, and maintaining an up-to-date copy of the rules of the board in the New Hampshire Code of Administrative Rules.</p> <p>(b) In order for a school to be an approved school under these rules, the school board shall comply with all applicable laws and rules set forth in the publications enumerated in (a) above.</p> <p>Ed 306.04 <u>Policy Development.</u></p>	<p>In order for a school to be an approved school under these rules, the school board shall comply with all applicable state laws and rules.</p> <p>Ed 306.04 <u>Policy Development.</u></p> <p>(a) <i>The superintendent, chief administering officer, or designee shall keep students, parents, educators, and all other personnel informed about school policy. Such information shall be readily available.</i></p> <p>(b) In accordance with Ed 303.01, the school board shall adopt and implement written policies and procedures relative to:</p>	<p>Removed paragraph (a)</p>	<p>Compliance with federal laws is not required?</p>
<p>(a) In accordance with Ed 303.01, the local school board shall adopt and implement written policies and procedures relative to:</p>	<p>(a) <i>The superintendent, chief administering officer, or designee shall keep students, parents, educators, and all other personnel informed about school policy. Such information shall be readily available.</i></p> <p>(b) In accordance with Ed 303.01, the school board shall adopt and implement written policies and procedures relative to:</p>	<p>Revised language</p> <p>Moved up from Ed 306.04 (g)</p>	<p>Compliance with federal laws is not required?</p>
		<p>Renumbered</p>	

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<p>(1) Absenteeism and attendance;</p>	<p>(1) Absenteeism and attendance, which shall:</p> <ul style="list-style-type: none"> <i>a. Include procedures for the accountability and supervision of students;</i> <i>b. Not penalize students who miss class or a required school event because of a school scheduling conflict;</i> <i>c. Implement a cooperative approach which places responsibility for notification when a student is tardy, absent, or dismissed on both the parents/guardians and the school;</i> 	<p>Paragraph a. – c. was moved from Ed 306.04(c)</p>
<p>(2) Promoting school safety.</p>	<p>(2) Promoting school safety. <i>to include procedures relative to:</i></p> <ul style="list-style-type: none"> <i>a. On school buses and on the school grounds, including playgrounds;</i> <i>b. During authorized school activities, such as field trips;</i> <i>c. Within the school building, including classrooms and laboratories;</i> <i>d. Off school grounds during school sanctioned activities, including but not limited to extended learning opportunities, work-based learning opportunities, and other learning activities that involve engagement with businesses and the community at large;</i> <i>e. In online and hybrid learning;</i> <i>f. In managing the behavior of children including describing how and under what circumstances restraint shall be used pursuant to RSA 126-U; and</i> <i>g. Providing for the immediate and adequate emergency care for students and school personnel</i> 	<p>Paragraphs a. – f. were moved to this section from Ed 306.04 (b).</p> <p>Paragraph g. was moved to this section from Ed 306.04 (a)(21)</p> <p>Paragraph h. was moved to this section from Ed 306.04 (e)</p>

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	<p>who sustain injury or illness during school hours or during scheduled school activities;</p> <p>h. Requiring educators to know and implement safety practices and procedures applicable to their assigned areas of responsibility and to include safety instruction in all applicable programs offered by the school;</p>		
<p>(3) Discipline:</p>	<p>(3) Discipline, including behavior management and intervention for students. Such policy shall:</p> <p>a. Include provisions regarding student rights and responsibilities, rules of conduct, and penalties for misbehavior;</p> <p>b. Be written in age-appropriate language;</p> <p>c. Be disseminated to parents and guardians; and</p> <p>d. Be available in written or oral form for students, parents, and guardians for whom English is a second language, whenever necessary;</p>	<p>Paragraphs a. – d. were moved to this section from Ed 306.04(f).</p>	
<p>(4) Records retention, including electronic files:</p>	<p>(4) Records retention, including electronic files, which shall require that:</p> <p>a. Complete and accurate records of students' attendance and scholarship be permanently kept and safely stored in a fire-resistant file, vault, or safe;</p> <p>b. A schedule for the retention and disposition of original records and information be established in accordance with RSA 189:29-a;</p> <p>c. Access to all student records and information be controlled by written procedures designed to protect individual rights and to preserve the confidential nature of the various types of records in compliance with the federal "Family Educational Rights and Privacy Act," U.S.C.</p>	<p>Paragraphs a. – d. were moved from Ed 306.04(g)</p>	<p>a. No consideration for storing files electronically in 2023?</p>

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	<p><i>1232g and RSA 91-A, Access to Public Records; and</i></p> <p><i>d. Adequate school staff are provided to maintain all school records in accordance with local policy, state laws and rules, and federal laws and regulations;</i></p>		
<p>(5) Character and citizenship:</p>	<p>(5) Character and citizenship, developed in consultation with school staff, administration, parents, and other representatives of the community, which shall incorporate in courses of study or instill in a caring educational environment, the following elements:</p> <p><i>a. Self-discipline, self-respect, and self-control;</i></p> <p><i>b. Pursuant to Part 2, Article 83 of the New Hampshire Constitution, humanity, benevolence, and truth and honesty with self and others;</i></p> <p><i>c. Fairness, integrity, and justice;</i></p> <p><i>d. Respect, courtesy, and human worth;</i></p> <p><i>e. Responsibility to oneself and others;</i></p> <p><i>f. Community service; and</i></p> <p><i>g. The rights and responsibilities of citizenship, pursuant to RSA 186:13, which shall be developed in consultation with school staff, administration, parents, and other representatives of the community;</i></p>	<p>Paragraphs a. – g. were moved from Ed 306.04 (i)(1) and (2)</p>	
<p>(6) Meeting the instructional needs of each individual student;</p>		<p>Removed</p>	<p>Removal of this policy requirement may create unintended disparity amongst learners.</p>
<p>(7) Student hazing;</p>	<p>(6) Student hazing;</p>	<p>Renumbered</p>	
<p>(8) Student harassment, including bullying, as required by RSA 193-F</p>	<p>(7) Student harassment, including bullying, as required by RSA 193-F</p>	<p>Renumbered</p>	
<p>(9) Sexual harassment, as detailed in Ed 303.01(j) and (k);</p>	<p>(8) Sexual harassment, as detailed in Ed 303.01(j) and (k);</p>	<p>Renumbered</p>	
<p>(10) Reporting of suspected abuse or neglect;</p>	<p>(9) Reporting of suspected abuse or neglect;</p>	<p>Renumbered</p>	

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<p>(11) Promotion of a school environment that is conducive to learning and supports strong family and community partnerships;</p>	<p>(10) Promotion of a school environment that is conducive to learning and supports strong family and community partnerships. <i>Such policy shall include:</i></p> <ul style="list-style-type: none"> <i>a. Engagement opportunities for parents and family members of students of all ages and learning levels;</i> <i>b. Parent educational activities throughout the school year to help parents support their children's learning;</i> <i>c. Curricular and learning materials made available to parents, consistent with copyright licensure of such materials;</i> <i>d. Frequent communication of school performance, student progress, and personalized learning plans, using both print and online formats;</i> <i>e. Working with agencies and businesses to support community-based developmental activities that prepare young children for school and promote ongoing achievement;</i> <i>f. Promote collaboration among parents, schools, and community on school improvement and student achievement projects;</i> <i>g. Development of a sustained plan to harness community resources, including but not limited to organizations, businesses, talented individuals, natural resources, and technology, to engage each</i> 	<p>Paragraphs a. – f. were moved from Ed 306.04(k) with some revisions to the original language.</p> <p>Renumbered</p>	<p>Are we putting in provisions from SB 272 that was defeated? Feels like a backdoor approach to promote political agendas.</p>
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	student in achieving necessary skills and knowledge; and		
	<p>h. Encouragement of business partnerships to assist students in the successful transition to employment or further education:</p>		
(12) Distance education, if the district chooses to offer distance education as provided in Ed 306.22;	Renumbered		
(13) Providing alternative means of earning credit toward a high school diploma or equivalent such as extended learning opportunities, and distance education to meet the requirements of RSA 193:1, (h) until July 1, 2015;	Removed paragraph (13) as it is outdated		
(14) Providing alternative means of demonstrating achievement of identified graduation competencies toward the awarding of a credit for a high school diploma or equivalent such as extended learning opportunities, career and technical education courses, and distance education no later than July 1, 2015 to meet the requirements of RSA 193:1, (h);	Renumbered and revised language and removed outdated language.		
(15) How a credit can be earned, as provided in Ed 306.27(c) until July 1, 2015;	Removed paragraph (15) as it is outdated		Should there be a contingency included during transition?
(16) How a credit used to track achievement of graduation competencies can be earned no later than July 1, 2015, as provided in Ed 306.27(e);	Revised language and added to the new Ed 306.04 (18)		
(17) Recommending developmentally appropriate daily physical activity and exercise;	Removed paragraph (17)		
(18) Behavior management and intervention for students;	Moved to Ed 306.04(3)		
(19) Homeless students;	Renumbered		
(20) Wellness as required by Section 204 of the federal Child Nutrition and WIC 42 USC 1751;	Removed as this is already required by federal statute and does not need to be restated in state regulation		

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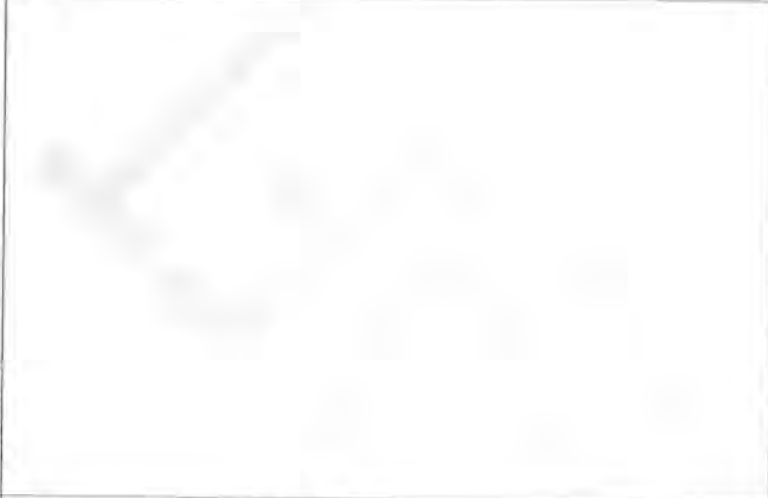
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<p>(21) Providing immediate and adequate emergency care for students and school personnel who sustain injury or illness during school hours or during scheduled school activities;</p> <p>(22) Meeting the special physical health needs of students;</p>	<p>(14) Meeting the special physical and emotional health needs of students;</p>	<p>Moved paragraph (21) to Ed 306.04(a)(2)</p>	<p>Why not mental health or spiritual health? Will additional resources be provided to schools for this work, or will the additional expectations be passed on to the local tax rate?</p>
<p>(23) Supporting the availability and distribution of healthy foods and beverages that create a healthy environment in all schools throughout all school buildings during the school day:</p>	<p>(15) Supporting <i>healthy foods and beverages in all schools, which shall include:</i></p> <ul style="list-style-type: none"> a. <i>Standards for nutrient dense foods and beverages for learning level needs of elementary, middle and high school;</i> b. <i>Portion size for nutrient dense foods and beverages in schools which support the framework for healthier food choices in all school environments;</i> c. <i>Nutrition targets for foods and beverages made available outside the federally regulated schools meals program. The targets shall follow those developed by a nationally recognized research-based organization, such as but not limited to USDA, or as determined by the department to have standards equivalent to the USDA;</i> d. <i>Developmentally appropriate opportunities to learn food preparation skills that support nationally recognized research-based nutrition standards</i> 	<p>Renumbered</p> <p>Added emotional health</p> <p>Revised language</p> <p>Paragraphs a. – e. were moved from Ed 306.11(g)(1-5)</p> <p>Renumbered</p>	

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e. Annual communication information about the policy and procedure and related curricula to the school community, including, but not limited to school staff, school board, parents, and students;

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<p>(24) Air quality in school buildings as required by RSA 200:48;</p>	<p>(16) Air quality in school buildings as required by RSA 200:48;</p>	<p>Renumbered</p>
<p>(25) Graduation competencies consistent with RSA 193-C:3 that students are expected to demonstrate for graduation in content areas as follows;</p> <ul style="list-style-type: none"> a. Arts education; b. Digital literacy; c. English; d. Mathematics that encompasses algebra, mathematical modeling, statistics and probability, complex applications of measurement, applied geometry, graphical presentation and interpretation, statistics and data analysis; e. Physical sciences; f. Biological sciences; g. US and NH History; h. US and NH government/civics; i. Economics, including personal finance; j. World history, global studies, or geography; k. Health education; and l. Physical education; and 		<p>Removed and replaced with graduation competencies in the new Ed 306.27</p>
<p>(26) Graduation competencies consistent with RSA 193-C:3 that students are expected to demonstrate for graduation no later than July 1, 2015, that encompass multiple content areas outlining the knowledge, skills and work-study practices <u>necessity</u> for success in colleges and careers.</p>		<p>Removed and replaced with graduation competencies in the new Ed 306.27</p>

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	<p>(17) How students will demonstrate, through multiple measures, academic and social readiness to advance to subsequent learning levels;</p>	New paragraph	
	<p>(18) How credit is granted to students based upon demonstrated acknowledgement of competencies, including:</p> <ul style="list-style-type: none"> a. Acknowledgement of achievement to students taking coursework in the seventh or eighth learning level toward high school graduation, if the course demonstrates competencies consistent with related high school course(s) and the student demonstrates proficiency; b. How a student demonstrates acknowledgment of competencies, including what would constitute defensible evidence collected towards acknowledgment of competencies; c. A statement that learn everywhere credits will be awarded to students who have earned them as outlined in Ed 1407.02; 	<p>Moved from Ed 306.04 (16) and revised.</p> <p>Paragraph a. was moved from Ed 306.26 (f)</p> <p>Paragraph b. – c. is new</p>	<p>So without a policy stating as such a school will not be approved to operate? Even if they have an established ELO program?</p>
	<p>(19) How students can graduate early, which shall outline:</p> <ul style="list-style-type: none"> a. The requirement of parental involvement for students under the age of 18. b. The approval process by the high school principal if it is determined that all state and local graduation requirements will be met and that early graduation is related to the career or educational plans of the student making the request; and 	Paragraph (20) was moved from Ed 306.27 (ae) and revised	

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	<p>c. How, upon demonstration of proficiency in all required competencies, awarding of appropriate credits and approval by the high school principal, the student shall be awarded a high school diploma; and</p>	
	<p>(20) Basic Learning Standards policy to include:</p> <p>a. A policy on homework, including its relationship to formative assessment;</p> <p>b. A policy for promoting students from one learning level to another based on achievement of competencies;</p> <p>c. A policy that outlines how digital literacy will be integrated in a developmentally appropriate manner across all learning levels;</p> <p>d. A policy for informing students of how to pursue advanced learning opportunities, including advanced placement courses in high school, career related credentials and certifications, and dual enrollment in college courses;</p> <p>e. A policy for informing students and families about ways to pursue extended learning opportunities, and career readiness activities. The policy shall address:</p> <ol style="list-style-type: none"> 1. The administration and supervision of the program 2. How certified school personnel oversee an individual student's program; 	<p>Paragraph a. was moved from Ed 306.14(a)(1)</p> <p>Paragraph b. was moved from Ed 306.14(a)(3)</p> <p>Paragraph c. was moved from Ed 306.14(a)(5)</p> <p>Paragraph d. was moved from Ed 306.14(a)(7)</p> <p>Paragraph e. was moved from Ed 306.26(g)</p> <p>Paragraph f. is new</p>

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<p>(b) The policies and procedures required by (a) above shall apply to each school except that (13)-(16), (25) and (26) shall not apply to elementary or middle schools.</p> <p>(c) The policy relative to absenteeism and attendance shall specify procedures for the accountability and supervision of students. The policy relative to absenteeism shall not penalize students who miss class or a required school event because of a school scheduling conflict. Districts shall implement a cooperative approach which places responsibility for notification when a student is tardy, absent, or dismissed on both the parents/guardians and the school.</p> <p>(d) The policy relative to promoting school safety shall require school administrators to implement procedures which relate to safe practices:</p> <p>(1) On school buses and on the school grounds, including playgrounds;</p>	<p>3. Requires that each extended learning proposal meets rigorous measurable standards and be approved by the school; and</p> <p>4. Access to the program by middle school students;</p> <p>f. A policy for informing students of how to include summer activities in their personalized learning plan;</p>		
	<p>(21) A policy on career pathway awareness and exploration, which shall require that career education provides for the infusion of developmentally appropriate knowledge and skill development throughout all areas of K-12 curriculum.</p>	<p>New paragraph</p>	
		<p>Removed this section</p>	
		<p>Moved this section to Ed 306.04(a)(1)</p>	
		<p>Moved this section to Ed 306.04(a)(2)</p>	

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<p>(2) During authorized school activities, such as field trips;</p> <p>(3) Within the school building, including classrooms and laboratories;</p> <p>(4) Off school grounds during school-sanctioned activities, including, but not limited to, work-based learning and internships;</p> <p>(5) In the use of online resources; and</p> <p>(6) In managing the behavior of children including, describing how and under what circumstances restraint shall be used pursuant to RSA 126-U.</p> <p>(e) Educators shall be required to know and implement the appropriate safety practices and procedures applicable to their assigned areas of responsibility and to include safety instruction in all applicable programs offered by the school.</p>			
<p>(f) The policy relative to student discipline shall:</p> <p>(1) Include provisions regarding:</p> <ul style="list-style-type: none"> a. Student rights and responsibilities; b. Rules of conduct; and c. Penalties for misbehavior. <p>(2) Be written in age-appropriate language;</p> <p>(3) Be disseminated to parents and guardians; and</p>		<p>Moved to Ed 306.04(b)(2)h.</p>	<p>Moved to Ed 306.04(a)(3)</p>

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<p>(4) Be available in written or oral form for students, parents, and guardians for whom English is a second language, whenever practical.</p>		
<p>(g) The local school board shall review with the superintendent or chief administering officer the conditions and methods for suspension and expulsion of students developed and implemented by the superintendent or chief administering officer and the local school board in accordance with RSA 193:13. The superintendent, chief administering officer, or designee shall keep students, parents, educators, and all other school personnel informed about school rules. Such information shall be readily available.</p>	<p>Removed. Already required by statute, so does not need to be re-stated in regulation.</p>	
<p>(h) The policy relative to records retention, including electronic files, disposition, and access shall require that complete and accurate records of students' attendance and scholarship be permanently kept and safely stored in a fire-resistant file, vault, or safe. A schedule for the retention and disposition of original records and information shall be established in accordance with RSA 189:29-a. Access to all student records and information shall be controlled by written procedures designed to protect individual rights and to preserve the confidential nature of the various types of records in compliance with the federal "Family Educational Rights and Privacy Act." 20 U.S.C. § 1232g, and RSA 91-A. Access to Public Records.</p>	<p>Moved to Ed 306.04(a)(4)</p>	
<p>(i) The policy relative to character and citizenship development shall:</p> <p>(1) Include those elements of character and citizenship to be incorporated in courses of study or instilled, by example, in a caring educational environment, including but not limited to:</p>	<p>Moved to Ed 306.04(a)(5)</p>	

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<p>a. Self-discipline, self-respect, and self-control;</p> <p>b. Pursuant to Part 2, Article 83 of the New Hampshire Constitution, humanity, benevolence, and truth and honesty with self and others;</p> <p>c. Fairness, integrity, and justice;</p> <p>d. Respect, courtesy, and human worth;</p> <p>e. Responsibility to oneself and others;</p> <p>f. Community service; and</p> <p>g. Pursuant to RSA 186:13, the rights and responsibilities of citizenship; and</p> <p>(2) Be developed in consultation with school staff, administration, parents, and other representatives of the community.</p>		
<p>(i) The policy relative to meeting the instructional needs of each student shall require administrators and educators to consider students' differing talents, interests, and development when planning the educational programs specified in Ed 306.</p>	<p>Removed</p>	<p>Removal of this policy requirement may create unintended disparity amongst learners.</p>
<p>(k) The policy relative to partnerships among schools, families, and communities shall comply with the following standards:</p> <p>(1) Schools shall strive to involve parents and family members of students of all ages and learning levels;</p>	<p>Moved to Ed 306.04(a)(10)</p>	

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<p>(2) Schools shall provide parent educational activities throughout the school year to help parents support their children's learning.</p>		
<p>(3) Schools shall frequently communicate school performance, student progress, personalized learning strategies as adopted by the local school board and in accordance with district and graduation competencies, and academic opportunities, using both print and online formats;</p>		
<p>(4) Schools shall work with agencies and businesses to support community-based developmental activities that prepare young children for school and promote ongoing achievement.</p>		
<p>(5) Schools shall promote collaboration among parents, schools, and community on school improvement and student achievement projects;</p>		
<p>(6) Schools shall strive to harness all available community resources, including but not limited to organizations, businesses, talented individuals, natural resources, and technology, to engage each student in achieving necessary skills and knowledge; and</p>		
<p>(7) Schools shall encourage business partnerships to assist students in the successful transition to employment or further education.</p>		
<p>(1) The policy relative to developmentally appropriate daily physical activity pursuant to Ed 310 shall recommend that all pupils participate in developmentally appropriate daily physical activity, exercise, or physical education as a way to minimize the health risks created by chronic inactivity,</p>	<p>Removed, redundant based upon Ed 310</p>	

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<p>childhood obesity, and other related health problems. The developmentally appropriate daily physical activity policy shall be in addition to and shall not replace the physical education program requirement in Ed 306.41.</p> <p><u>Ed 306.05 School Philosophy, Goals, and Objectives.</u> The local school board shall direct each school in its district to adopt a written philosophy and a statement of goals and objectives consistent with the rules of the state board of education. Provisions shall be made for the review of the philosophy, goals, and objectives at least every 5 years.</p>	<p><u>Ed 306.05 School Philosophy, Goals, and Objectives.</u> The school board shall direct each school in its district to adopt a written philosophy and a statement of goals and objectives consistent with the rules of the state board. <i>The aforementioned shall be visible to students, staff, and parents.</i> Provisions shall be made for the review of the philosophy, goals, and objectives at least every 5 years.</p>	<p>Revised language</p>	
<p><u>Ed 306.06 Culture and Climate.</u> (a) The school policies adopted by the local school board shall reflect: (1) The acknowledgement of diversity and respect for differences; (2) Shared ownership and responsibility for the success of the school among students, their families, and the community; (3) Student leadership through involvement in decision-making; and (4) Respectful use of language and behavior by all school members that is void of ethnic, racial, and sexual stereotypes and biases.</p>	<p><u>Ed 306.06 Culture and Climate.</u> (a) The school policies adopted by the school board shall reflect: (1) The acknowledgement of diversity and respect for differences, <i>affording all students equitable opportunities.</i> (2) Shared ownership and responsibility for the success of the school among students, their families, and the community; (3) Student leadership through involvement in decision-making; and (4) Respectful use of language and behavior by all school members that is void of <i>any and all</i> stereotypes and biases.</p>	<p>Revised language</p>	<p>Will this be defined?</p>
<p>(b) The school administration and staff shall:</p>	<p>(b) The school administration and staff shall <i>develop a plan to address academic under-</i></p>	<p>Revised language</p>	<p>The original language speaks to the whole child and not only the academics. Please reinstate.</p>

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	<i>performance of individual students and the elimination of barriers to learning</i>		Please define
<p>(1) Review ways in which equity gaps in achievement can be reduced and barriers to learning can be eliminated; and</p> <p>(2) Work together to establish a fair and equitable code of discipline that is fairly and consistently implemented which supports students' understanding of the importance of norms, rules, and expectations for behavior.</p> <p>(c) The school administration shall provide professional development opportunities directed at understanding the policies and reporting requirements that support a safe and healthy school environment.</p> <p>Ed 306.07 School Facilities. The local school board shall:</p> <p>(a) Require that the facilities for each school provide the following:</p>	<p>Removed</p>	<p>Revised language; facilities requirements, and custodial and maintenance requirements from Ed 306.09 were moved to a new section of rules, Ed 320 Facility Approval Requirements</p>	<p>No longer require fair and equitable code of discipline? Seems very odd.</p>
<p>(1) Consistent with RSA 189:24, a clean, healthy, and safe learning environment for all areas of the school building, grounds, and school-related activities;</p> <p>(2) Lighting in compliance with the state building code as provided in RSA 155-A;</p> <p>(3) Exhaust and outdoor air ventilation, proper temperature and humidity conditions in compliance with the state building code as provided in RSA 155-A; and</p> <p>(b) With regard to school facilities:</p> <p>(1) Customize classrooms and other school-related environments to the needs of different content areas. Any lack of specialized spaces for arts, science,</p>	<p>Ed 306.07 School Facilities. <i>The school board shall require that the facilities operated by the school district for K-12 educational purposes are approved to operate or are conditionally approved to operate in accordance with Ed 320.</i></p>		

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<p>technology education and similar requirements shall be addressed as part of the next construction project at the school that receives school building aid under RSA 198:15-a:</p> <p>(2) Provide for accessibility for students with disabilities;</p> <p>(3) Demonstrate compliance with Saf-C 6000 (through completion of a life safety inspection by the local fire department or other authority having jurisdiction as required by RSA 153:14;</p> <p>(4) Document compliance with regulations relating to school building, sanitation, sewage disposal, water supply, and other matter affecting public health through inspection by the local health officer, other authority having jurisdiction, or an individual, if no municipal officer is available who has received a master's degree in public health; and</p> <p>(5) Demonstrate compliance for all furniture and electrical appliances approved by the school administration and comply with requirements of the state fire code, Saf-C 6000.</p>		
<p>Ed 306.08 <u>Instructional Resources</u>:</p> <p>(a) The local school board shall require that each school:</p> <p>(1) Provides a developmentally appropriate collection of instructional resources, including online and print materials, equipment, and instructional technologies, that shall be current, comprehensive, and necessary to support the curriculum as well as the instructional needs of the total school population;</p>	<p>Ed 306.08 <u>Learning Resources</u></p> <p>(a) The school board shall require that each school:</p> <p>(1) Provides a developmentally appropriate collection of <i>learning</i> resources, including online and print materials, equipment, and <i>learning</i> technologies, that shall be current, comprehensive, and necessary to support the curriculum as well as the <i>learning</i> needs of <i>all students</i>;</p>	<p>Changed the title of the section</p> <p>Revised the language</p>

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<p>(2) Provides that instructional resources are, as appropriate:</p> <ul style="list-style-type: none"> a. Catalogued and classified according to practices accepted by the American Library Association as specified in the Anglo-American Cataloguing Rules, Second Edition (AACR2), 2005 update as referenced in Appendix II; b. Organized to make them accessible to students and staff; c. Managed through circulation policies and procedures that are designed to maximize the use of the resources; and d. Utilize community resources; 	<p>(2) Provides that the <i>learning</i> resources are, as appropriate:</p> <ul style="list-style-type: none"> a. Organized <i>and</i> accessible to students, staff, <i>and</i> parents; b. Managed through circulation policies and procedures that are designed to maximize the use of the resources; and c. Utilize community resources; 	<p>Revised the language</p> <p>Removed paragraph a.</p> <p>Revised the language</p>	<p>Are we putting in provisions from SB 272 that was deleted? Feels like a backdoor approach to promote political agendas.</p>
<p>(3) Provides instructional resources to all students and staff from designated space(s) in each school, including:</p> <ul style="list-style-type: none"> a. Ready access to instructional resources, including those available online or through interlibrary loan; 1. Accessing information efficiently and effectively; 2. Evaluating information and sources critically and competently; 3. Citing sources and not plagiarizing; 4. Using information accurately and creatively; 5. Pursuing information related to personal interests; 6. Appreciating literature and other creative expressions of information; 	<p>(3) Provides <i>opportunities for instruction in:</i></p> <ul style="list-style-type: none"> a. Accessing information efficiently and effectively; b. Evaluating information and sources critically and competently; c. Citing sources and not plagiarizing; d. Using information accurately and creatively; e. Pursuing information related to personal interests; f. Appreciating literature and other creative expressions of information; 	<p>Revised the language</p> <p>Renumbered</p>	

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<p>7. Striving for excellence in information-seeking and knowledge generation;</p> <p>8. Recognizing the importance of information to a democratic society;</p> <p>9. Practicing ethical behavior in regard to information and information technology; and</p> <p>10. Participating effectively in groups to pursue and generate information; and</p> <p>c. Activities to promote the development of reading, viewing, and listening skills; and</p>	<p>g. Striving for excellence in information-seeking and knowledge generation;</p> <p>h. Recognizing the importance of information to a democratic society;</p> <p>i. Practicing ethical behavior in regard to information and information technology;</p> <p>j. Participating effectively in groups to pursue and generate information; and</p> <p>k. Activities to promote the development of reading, viewing, and listening skills</p>	
<p>(4) Implements a written plan for the ongoing development, organization, acquisition, maintenance, replacement, and updating of instructional resources necessary to support the needs of the user population and the curriculum.</p> <p>(b) At a minimum, the plan implemented under (a)(4) above shall:</p> <p>(1) Provide an analysis and assessment of the present instructional resources based on:</p> <p>a. The needs of the user population and the curriculum;</p> <p>b. Accessibility of instructional resources to all students and staff;</p> <p>c. Strengths and weaknesses of the present instructional resources; and</p> <p>d. Resources available within the district, the local community, and beyond;</p>	<p>(4) Implements a <i>district specific</i> plan for ongoing development, organization, acquisition, maintenance, replacement, and updating of <i>curriculum and learning</i> resources necessary to support the <i>needs of students</i>.</p>	<p>Revised the language</p> <p>Removed</p>

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<p>(2) Reflect developing instructional technologies; and</p> <p>(3) Establish priorities, criteria, timelines, and procedures for the selection, acquisition, maintenance, and replacement of instructional resources which shall include but not be limited to:</p> <ul style="list-style-type: none"> a. Online materials; b. Print materials; c. Equipment; and d. Instructional technologies. 		
<p>Ed 306.09 <u>Custodial and Maintenance Services</u>.</p> <p>(a) The local school board shall provide for each school such custodial services as are necessary to ensure a clean, sanitary, and safe physical plant and grounds. The school plant shall be cleaned on a daily basis when school is in session. School repairs and maintenance shall be performed on a regular basis.</p> <p>(b) All school staff, including custodians, maintenance workers, food service workers, educators, support staff, and administrators shall receive training on their roles in maintaining clean, healthy school facilities and the importance of quality indoor air; and</p> <p>(c) Schools shall minimize the use of toxic chemicals for cleaning and pest control. Staff shall not be permitted to bring cleaning products or pesticides into a school without approval from the school administration.</p>	<p>Moved to Ed 320, Facility Approval Requirements</p>	

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<p>Ed 306.10 <u>Administrative Support Services</u>. The local school board shall provide for each school staff to maintain all school records in accordance with local policy, state laws and rules, and federal laws and regulations.</p>	<p>Ed 306.10 <u>Administrative Support Services</u>. The school board shall provide for each school staff to maintain all school records in accordance with local policy, state laws and rules, and federal laws and regulations.</p>	<p>Removed local to align with definition</p>	
<p>Ed 306.11 <u>Food and Nutrition Services</u>.</p> <p>(a) The local school board shall:</p> <p>(1) Require that each school makes a meal available during school hours to every student under its jurisdiction, in accordance with RSA 189:11-a, I-II;</p> <p>(2) Provide a qualified individual, such as, but not limited to, a school nutrition/food service director, to oversee the operation of school meals, to maintain proper resources that meet state and federal regulations, and maintain state health requirements for each school site within the district; and</p> <p>(3) Require that each newly-constructed school or renovated kitchen or cafeteria provide space for the preparation and consumption of meals in compliance with Ed 321.12(d).</p>	<p>Ed 306.11 <u>Food and Nutrition Services</u>.</p> <p>(a) The school board shall:</p> <p>(1) Require that each school makes a meal available during school hours to every student under its jurisdiction, in accordance with RSA 189:11-a, I-II;</p> <p>(2) Provide a qualified individual, such as, but not limited to, a school nutrition/food service director, to oversee the operation of school meals, to maintain proper resources that meet state and federal regulations, and maintain state health requirements for each school site within the district; and</p> <p>(3) Require that each newly-constructed school or renovated kitchen or cafeteria provide space for the preparation and consumption of meals in compliance with Ed 321.12(d).</p>	<p>Removed local to align with definition</p>	
<p>(b) All food service employees shall, within their first year of employment, obtain a certificate of completion for an approved sanitation course.</p> <p>(c) If a school nutrition/food service director is employed, each food service director shall, whenever feasible, obtain certification or credentials from an approved program, including but not limited to School Nutrition Association (SNA) certification, within the first 5 years of employment.</p> <p>(d) Students shall be provided with an adequate time to consume meals in each elementary school in accordance with the federal Child Nutrition and</p>	<p>(b) All food service employees shall, within their first year of employment, obtain a certificate of completion for an approved sanitation course.</p> <p>(c) If a school nutrition/food service director is employed, each food service director shall, whenever feasible, obtain certification or credentials from an approved program, including but not limited to School Nutrition Association (SNA) certification, within the first 5 years of employment.</p> <p>(d) Students shall be provided with an adequate time to consume meals in each elementary school in accordance with the federal Child Nutrition and</p>	<p>No change</p>	

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<p>WIC Reauthorization Act of 2004 (Public Law 108-265).</p> <p>(c) Students shall be provided with an adequate time to consume meals in each middle and high school in accordance with the federal Child Nutrition and WIC Reauthorization Act of 2004 (Public Law 108-265).</p> <p>(f) If a waiver is granted pursuant to (a)(1) above due to inadequate space, the school district shall make provisions in the next school physical plant expansion provisions to house a food service preparation and consumption area that is in compliance with Ed 321.12(d).</p>	<p>WIC Reauthorization Act of 2004 (Public Law 108-265).</p> <p>(c) Students shall be provided with an adequate time to consume meals in each middle and high school in accordance with the federal Child Nutrition and WIC Reauthorization Act of 2004 (Public Law 108-265).</p> <p>(f) If a waiver is granted pursuant to (a)(1) above due to inadequate space, the school district shall make provisions in the next school physical plant expansion provisions to house a food service preparation and consumption area that is in compliance with Ed 321.12(d).</p>	
<p>(g) The policy relative to distribution of healthy foods and beverages that create a healthy environment required by Ed 306.04(a)(21) shall include:</p> <p>(1) Standards for nutrient dense foods and beverages for learning level needs of elementary, middle and high school as identified and defined by 7CFR Part 210.10;</p> <p>(2) Portion size for nutrient dense foods and beverages in schools which support the framework for healthier food choices in all school environments;</p> <p>(3) Nutrition targets for foods and beverages made available outside the federally regulated school meals program. The targets shall follow those developed by a nationally recognized research-based organization, such as but not limited to USDA, or as determined by the department to have standards equivalent to the USDA;</p>		<p>Moved to Ed 306.04</p>

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<p>(4) Developmentally appropriate opportunities to learn food preparation skills that support nationally recognized research-based nutrition standards; and</p> <p>(5) Annual communication information about the policy and procedure and related curricula to the school community, including, but not limited to school staff, school board, parents and students.</p>		
<p>(h) Any school in (g)(3) choosing a standard for foods available at school which is not consistent with the USDA standard for Child Nutrition Programs, shall request a waiver from the bureau of nutrition programs and services. The bureau shall evaluate the alternative standards and shall grant the waiver if the alternative standards are determined to be equivalent to the nutrition standards of 7 CFR Part 210.</p>	<p>(g) Any school choosing a standard for foods available at school which is not consistent with the USDA standard for Child Nutrition Programs, shall request a waiver from the bureau of nutrition programs and services. The bureau shall evaluate the alternative standards and shall grant the waiver if the alternative standards are determined to be equivalent to the nutrition standards of 7 CFR Part 210.</p>	<p>Revised and renumbered</p>
<p>Ed 306.12 <u>School Health Services</u></p> <p>(a) In accordance with federal and state law, including, but not limited to, the Family Educational Rights and Privacy Act (FERPA), Section 504 of the Rehabilitation Act of 1973, RSA 141-C, RSA 169-C, RSA 200:26-41, and RSA 326-B, the local school board shall require that each school provides qualified personnel to carry out appropriate school health-related activities.</p> <p>(b) Each school nurse employed by a school district shall hold a current license as a registered nurse under RSA 326-B and a current school nurse certificate under Ed 504.07, Ed 504.08 or Ed 504.09. Each registered nurse, licensed practical nurse or licensed nursing assistant employed by a school district shall hold such current license under RSA 326-B. If a school nurse or licensed practical nurse is not available to a school for any reason, at</p>	<p>Ed 306.12 <u>School Health Services</u></p> <p>(a) In accordance with federal and state law, including, but not limited to, the Family Educational Rights and Privacy Act (FERPA), Section 504 of the Rehabilitation Act of 1973, RSA 141-C, RSA 169-C, RSA 200:26-41, and RSA 326-B, the school board shall require that each school provides qualified personnel to carry out appropriate school health-related activities.</p> <p>(b) Each school nurse employed by a school district shall hold a current license as a registered nurse under RSA 326-B and a current <i>license</i> under Ed 504.08, Ed 504.09 or Ed 504.10. Each registered nurse, licensed practical nurse or licensed nursing assistant employed by a school district shall hold such current license under RSA 326-B. If a school nurse or licensed practical nurse is not available to a school for any reason, at least one other person who</p>	<p>Revised to reflect current statutory references and practice</p>

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<p>least one other person who has a current first aid and cardiopulmonary resuscitation certification (CPR) shall be available.</p>	<p>has a current first aid and cardiopulmonary resuscitation certification (CPR) certification shall be available.</p>		
<p>Ed 306.14 <u>Basic Instructional Standards</u>. (a) The local school board shall require that each school has an instructional program which includes the following:</p>	<p>Ed 306.14 <u>Basic Learning Standards</u>. (a) The school board shall require that each school has a <i>learning</i> program which includes <i>curriculum and learning materials and resources matched to the appropriate skill levels of students and an organized plan for recording student progress in meeting competencies</i>;</p>	<p>Revised language</p>	
<p>(1) A policy on homework, including its relationship to the grading system; (2) An organized plan for recording student progress in meeting district and graduation competencies in alignment with RSA 193-C:3; (3) A policy for promoting students from one learning level to another based on achievement of district competencies in alignment with RSA 193-C:3; (4) Instructional materials and resources matched to the appropriate skill levels of students; (5) A policy that outlines how digital literacy will be integrated in a developmentally appropriate manner across grades 1-12 instruction, and how the district or graduation competencies associated with digital literacy will be assessed either alone or in combination with other district or graduation competencies and assessments; (6) A policy outlining how students will demonstrate achievement of district and graduation</p>		<p>Moved to Ed 306.04</p>	

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<p>competencies including the awarding of credit for required subjects and open electives;</p> <p>(7) A policy encouraging students to pursue and demonstrate advanced course work, including advanced placement courses in high school, dual enrollment in college courses; and</p> <p>(8) A policy encouraging students to have a plan for summer activities that support student learning.</p>			
<p>(b) The instructional program shall enable students to demonstrate achievement of graduation competencies in alignment with RSA 193-C:3.</p> <p><u>Ed 306.15 Provision of Staff and Staff Qualifications.</u></p> <p>(a) To carry out the educational program established by these rules and local school board policy, the local school board shall require that each school provides:</p>	<p><u>Ed 306.15 Provision of Staff and Staff Qualifications.</u></p> <p>(a) To carry out the educational program established by these rules and school board policy, the school board shall require that each school provides:</p>	<p>Removed</p> <p>Removed the word local to conform with definition</p>	<p>Please justify why this paragraph was removed.</p>
<p>(1) The services of a certified principal, a certified library media specialist, and a certified guidance counselor(s);</p> <p>(2) For the hiring and training of educators certified under Ed 500 to teach classes and or courses in their certified content area;</p> <p>(3) In each elementary school, the services of a reading specialist and library media specialist to facilitate the delivery of the language arts and reading program established in Ed 306.37(a);</p> <p>(4) In each middle and high school, a library media specialist to support the instructional resources program and facility requirements of Ed 306.08; and</p>	<p>(1) The services of a certified principal, a certified library media specialist, and a certified school counselor(s);</p> <p>(2) For the hiring and training of educators certified under Ed 500 to <i>facilitate learning</i> in their certified content area;</p> <p>(3) In each elementary school, the services of a reading specialist and library media specialist to facilitate the delivery of the language arts and reading program established in Ed 306.37(a);</p> <p>(4) In each middle and high school, a library media specialist to support the <i>learning</i> resources program and facility requirements of Ed 306.08; and</p>	<p>Revised the language</p>	<p>Redundant language in (3) and (4) Already address in (a)(1)</p>

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<p>(5) Educators, including art, music, health, and physical education teachers, in accordance with class size requirements in Ed 306.17.</p>	<p>(5) Educators in accordance with class size requirements in Ed 306.17.</p>	
<p>(b) The local school board shall require that in carrying out the school counseling program established by Ed 306.39:</p>	<p>(b) The school board shall require that in carrying out the school counseling program established by Ed 306.39:</p>	<p>Removed the word local to conform with definition</p>
<p>(1) The counseling load in each elementary school shall not exceed the equivalent of one full-time certified school counselor per 500 students enrolled;</p>	<p>(1) The counseling load in each elementary school shall not exceed the equivalent of one full-time certified school counselor per 500 students enrolled;</p>	<p>The intent of this doesn't reflect the language. The language suggests that a school with 2 FTE Counselors for 500 students</p>
<p>(2) The counseling load in each middle school and each high school shall not exceed the equivalent of one full-time certified school counselor per 300 students enrolled;</p>	<p>(2) The counseling load in each middle school and each high school shall not exceed the equivalent of one full-time certified school counselor per 300 students enrolled;</p>	<p>would be out of compliance. It's backwards and needs to be corrected for both paragraphs (1) and (2). Also, how does this measure reflect with the ASCA model that is referenced later in the document? <u>ASCA recommended ratios</u></p>
<p>(3) High schools with more than 4 school counselors shall provide a high school level certified director of school counseling to coordinate the implementation of the school counseling program plan and policy, unless (4) below applies; and</p>	<p>(3) High schools with more than 4 school counselors shall provide a high school level certified director of school counseling to coordinate the implementation of the school counseling program plan and policy, unless (4) below applies; and</p>	
<p>(4) District level certified directors of school counseling to coordinate K-12 implementation of the school counseling program plan and policy shall be provided in districts where the number of school counselors across all schools exceeds 10.</p>	<p>(4) District level certified directors of school counseling to coordinate K-12 implementation of the school counseling program plan and policy shall be provided in districts where the number of school counselors across all schools exceeds 10.</p>	
<p>(c) The local school board shall require that each school with an enrollment of 500 or more students provides the services of an associate principal or 2 or more persons with administrative certification under Ed 506 who together act as a full-time equivalent to carry out administrative duties assigned by the superintendent in accordance with local school board policy.</p>	<p>(c) The school board shall require that each school with an enrollment of 500 or more students provides the services of an associate principal or 2 or more persons with administrative certification under Ed 506 who together act as a full-time equivalent to carry out administrative duties assigned by the superintendent in accordance with school board policy.</p>	<p>Removed the word local to conform with definition</p>
<p>(d) The local school board may provide for each school the services of additional staff to facilitate the</p>	<p>(d) The school board may provide for each school the services of additional staff to facilitate the use of</p>	<p>Revised language</p>

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<p>use of the instructional resources described in Ed 306.08 and the technological resources needed to facilitate the digital literacy program described in Ed 306.42.</p>	<p>the <i>learning</i> resources described in Ed 306.08 and the technological resources needed to facilitate the digital literacy program described in Ed 306.42.</p>	
<p>(c) Pursuant to RSA 189:24, and in accordance with Ed 500 and Ed 600, the local school board shall require that each professional staff member is certified for assignment by the department.</p>	<p>(c) Pursuant to RSA 189:24, and in accordance with Ed 500 and Ed 600, the school board shall require that each professional staff member is certified for assignment by the department.</p>	<p>Removed paragraph (f) as it is already required under the Ed 500 rules and in Ed 306.16.</p>
<p>(f) In accordance with Ed 509, the local school board shall require that each professional staff member shall improve the content knowledge and teaching skills through participation in a local professional development plan.</p>	<p>(f) An educator with sufficient content knowledge as determined by the school principal may be given a minor assignment to teach in a program area in which he or she is not certified. A minor assignment shall be less than fifty percent of the individual's weekly work time and be reviewed on an annual basis to ensure that the individual has the appropriate level of content knowledge.</p>	
<p>(g) An educator with sufficient content knowledge as determined by the school principal may be given a minor assignment to teach in a program area in which he or she is not certified. A minor assignment shall be less than fifty percent of the individual's weekly work time and be reviewed on an annual basis to insure that the individual has the appropriate level of content knowledge.</p>	<p>(g) An educator with sufficient content knowledge as determined by the school principal may be given a minor assignment to teach in a program area in which he or she is not certified. A minor assignment shall be less than fifty percent of the individual's weekly work time and be reviewed on an annual basis to insure that the individual has the appropriate level of content knowledge.</p>	
<p>Ed 306.16 Professional Development. In accordance with Ed 512:</p> <p>(a) The local school board shall require:</p> <p>(1) That each professional and paraeducator staff member improves the content knowledge and teaching skills through participation in professional development activities as described in the district professional development master plan.</p> <p>(2) That the goals in the professional development master plan align with the district/school improvement goals.</p>	<p>Ed 306.16 Professional Development. In accordance with Ed 513:</p> <p>(a) The school board shall require:</p> <p>(1) That each professional and paraeducator staff member improves the content knowledge and teaching skills through participation in professional development activities as described in the district professional development master plan.</p> <p>(2) That the goals in the professional development master plan align with the district/school improvement goals.</p>	<p>Fixed incorrect regulatory reference</p>

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<p>(3) That the professional development master plan guides each professional staff member's individual professional development plan in its design, implementation, and evaluation; and</p> <p>(4) The regular assessment and evaluation of the needs, design, implementation, and impact on student learning of professional development activities and programs; and</p> <p>(b) The school administration shall require that:</p> <p>(1) Each certified educator's individual professional development plan required under Ed 512.03 is aligned with the professional development master plan;</p> <p>(2) The professional development activities included in the professional development master plan are designed to improve professional knowledge, as measured in its success in meeting students' needs and improving students' learning; and</p>	<p>(3) That the professional development master plan guides each professional staff member's individual professional development plan in its design, implementation, and evaluation; and</p> <p>(4) The regular assessment and evaluation of the needs, design, implementation, and impact on student learning of professional development activities and programs; and</p> <p>(b) The school administration shall require that:</p> <p>(1) Each certified educator's individual professional development plan required under Ed 513.03 is aligned with the professional development master plan;</p> <p>(2) The professional development activities included in the professional development master plan are designed to improve professional knowledge, as measured in its success in meeting students' needs and improving students' learning; and</p> <p>(3) The professional development activities included in the local professional development master plan under Ed 513.02(c)(7):</p> <p>a. Are:</p> <ol style="list-style-type: none"> 1. Student focused; 2. Data driven; 3. Research based; 4. Intensive; and 5. Sustained; and <p>b. Include:</p>		
<p>(3) The professional development activities included in the local professional development master plan under Ed 512.02(c)(7):</p> <p>a. Are:</p> <ol style="list-style-type: none"> 1. Student focused; 2. Data driven; 3. Research based; 4. Intensive; and 5. Sustained; and <p>b. Include:</p>	<p>(3) The professional development activities included in the local professional development master plan under Ed 513.02(c)(7):</p> <p>a. Are:</p> <ol style="list-style-type: none"> 1. Student focused; 2. Data driven; 3. Research based; 4. Intensive; and 5. Sustained; and <p>b. Include:</p>		
		Fixed incorrect regulatory reference	
		No change	

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<p>1. Job-embedded activities; 2. Research; 3. Collaboration; 4. Practice; and 5. Reflection. Ed 306.17 <u>Class Size</u>:</p> <p>(a) Class size for instructional purposes, in each school shall be:</p> <p>(1) Kindergarten – grade 2, 25 students or fewer per educator, provided that each school shall strive to achieve the class size of 20 students or fewer per educator;</p> <p>(2) Grades 3 – 5, 30 students or fewer per educator, provided that each school shall strive to achieve the class size of 25 students or fewer per educator; and</p> <p>(3) Middle and senior high school, 30 students or fewer per educator.</p> <p>(b) These class size requirements may be exceeded for study halls, band and chorus, and other types of large group instruction, including but not limited to, lectures, combined group instruction, and showing of educational television and films.</p> <p>(c) In the interest of safety, the maximum number of students in laboratory classes in such areas as science and career and technical education shall be determined by the number of work stations and the size and design of the area. In no case shall the number of students in laboratory classes exceed 24</p> <p>Ed 306.18 <u>School Year</u>.</p>	<p>1. Job-embedded activities; 2. Research; 3. Collaboration; 4. Practice; and 5. Reflection. Ed 306.17 <u>Class Size</u>:</p> <p>(a) Class size for instructional purposes, in each school shall be:</p> <p>(1) Kindergarten – grade 2, 25 students or fewer per educator, provided that each school shall strive to achieve the class size of 20 students or fewer per educator;</p> <p>(2) Grades 3 – 5, 30 students or fewer per educator, provided that each school shall strive to achieve the class size of 25 students or fewer per educator; and</p> <p>(3) Middle and senior high school, 30 students or fewer per educator.</p> <p>(b) These class size requirements may be exceeded for study halls, band and chorus, and other types of large group instruction, including but not limited to, lectures, combined group instruction, and showing of educational <i>videos</i>.</p> <p>(c) In the interest of safety, the maximum number of students in laboratory classes in such areas as science and career and technical education shall be determined by the number of work stations and the size and design of the area. In no case shall the number of students in laboratory classes exceed 24</p> <p>Ed 306.18 <u>School Year</u>.</p>	<p>No change</p>	<p>In classes or in laboratory activities? It is conceivable that a class of 30 may have only ~5 students engaged in a laboratory activity at a given time.</p>
<p>Ed 306.17 <u>Class Size</u>:</p> <p>(a) Class size for instructional purposes, in each school shall be:</p> <p>(1) Kindergarten – grade 2, 25 students or fewer per educator, provided that each school shall strive to achieve the class size of 20 students or fewer per educator;</p> <p>(2) Grades 3 – 5, 30 students or fewer per educator, provided that each school shall strive to achieve the class size of 25 students or fewer per educator; and</p> <p>(3) Middle and senior high school, 30 students or fewer per educator.</p> <p>(b) These class size requirements may be exceeded for study halls, band and chorus, and other types of large group instruction, including but not limited to, lectures, combined group instruction, and showing of educational television and films.</p> <p>(c) In the interest of safety, the maximum number of students in laboratory classes in such areas as science and career and technical education shall be determined by the number of work stations and the size and design of the area. In no case shall the number of students in laboratory classes exceed 24</p> <p>Ed 306.18 <u>School Year</u>.</p>	<p>Ed 306.17 <u>Class Size</u>:</p> <p>(a) Class size for instructional purposes, in each school shall be:</p> <p>(1) Kindergarten – grade 2, 25 students or fewer per educator, provided that each school shall strive to achieve the class size of 20 students or fewer per educator;</p> <p>(2) Grades 3 – 5, 30 students or fewer per educator, provided that each school shall strive to achieve the class size of 25 students or fewer per educator; and</p> <p>(3) Middle and senior high school, 30 students or fewer per educator.</p> <p>(b) These class size requirements may be exceeded for study halls, band and chorus, and other types of large group instruction, including but not limited to, lectures, combined group instruction, and showing of educational <i>videos</i>.</p> <p>(c) In the interest of safety, the maximum number of students in laboratory classes in such areas as science and career and technical education shall be determined by the number of work stations and the size and design of the area. In no case shall the number of students in laboratory classes exceed 24</p> <p>Ed 306.18 <u>School Year</u>.</p>	<p>Revised language</p> <p>No change</p> <p>Revised language</p>	<p>In classes or in laboratory activities? It is conceivable that a class of 30 may have only ~5 students engaged in a laboratory activity at a given time.</p>

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<p>(a) Pursuant to RSA 189:1 and RSA 189:24, each school district shall maintain a school year as provided below:</p>	<p>(a) Pursuant to RSA 189:1 and RSA 189:24, each school district shall maintain a school year as provided below, <i>which shall identify the total instructional hours offered, and recognize that students advance upon demonstrated acknowledgment of competencies, not based on seat time, pursuant to Ed 306.27(h)</i>:</p>	
<p>(1) The school district shall maintain in each elementary school, a school year of at least 945 hours of instructional time and in each kindergarten at least 450 hours of instructional time;</p> <p>(2) The school district shall maintain in each middle and high school, a school year of at least 990 hours of instructional time. Districts shall provide at least 990 hours of instructional time for grades 7 and 8 in elementary schools that include grades 7, or 8, or both;</p>	<p>(1) The school district shall maintain in each elementary school, a school year of at least 945 hours of instructional time and in each kindergarten at least 450 hours of instructional time;</p> <p>(2) The school district shall maintain in each middle and high school, a school year of at least 990 hours of instructional time. Districts shall provide at least 990 hours of instructional time for grades 7 and 8 in elementary schools that include grades 7, or 8, or both;</p>	<p>No change</p>
<p>(3) The instructional school day of an individual student shall not exceed 5.75 hours of instructional time in elementary schools and 6 hours of instructional time in middle and high schools;</p>	<p>(3) The instructional school day of an individual student shall not exceed 5.75 hours of instructional time in elementary schools and 6 hours of instructional time in middle and high schools;</p>	
<p>(4) The school shall have in its school year an additional 60 hours in duration to provide for instructional time lost due to inclement weather or unexpected circumstances, staff development, and parent-teacher conferences. At least 30 of the 60 additional hours shall be available for rescheduling hours lost due to inclement weather or other emergencies. Schools shall use these additional hours to reschedule lost instructional time before requesting a waiver of the amount of instructional time under RSA 189:2, unless extraordinary circumstances exist that would place an unreasonable burden on the school or students such as, but not limited to, substantial building damage;</p>	<p>(4) Schools shall use additional hours to reschedule lost instructional time before requesting a waiver of the amount of instructional time under RSA 189:2, unless extraordinary circumstances exist that would place an unreasonable burden on the school or students such as, but not limited to, substantial building damage;</p>	<p>Revised language</p>

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<p>(5) A school may have a shortened day when an emergency condition exists which might adversely affect the health and safety of students, provided that the number of hours of instructional time originally planned for the day shall be credited to the number of hours of instructional time in the school year, if:</p> <p>a. On that day, the school would normally have had at least 5.25 hours of instructional time; and</p> <p>b. The school remained open for at least 3.5 hours of instructional time;</p>		Removed paragraphs	
<p>(6) There shall be no requirement to reschedule instructional time for kindergarten if morning or afternoon kindergarten sessions are cancelled due to delayed opening or early release for students in grade 1 or higher; and</p> <p>(b) Lunch time, home room periods, passing time, and breaks shall not be counted toward the required amount of instructional time. Elementary schools may count up to 30 minutes of recess per day as instructional time for pupils in kindergarten through grade 6. Advisory periods in middle and high schools shall be counted as instructional time.</p> <p>(c) The high school graduation date shall be set no more than 5 school days or 30 instructional hours before the end of the scheduled school year without consideration of making up lost time pursuant to Ed 306.18 (a)(4)</p>	<p>(6) There shall be no requirement to reschedule instructional time for kindergarten if morning or afternoon kindergarten sessions are cancelled due to delayed opening or early release for students in grade 1 or higher; and</p>	No change	<p>Does the removal of this standard now mean that these times can be included in the instructional time calculation?</p> <p>Can graduation now be set more than 5 days before the scheduled end of the school year?</p>
<p>Ed 306.19 School Calendar. Each school shall maintain a school calendar.</p>	<p>Ed 306.19 School Calendar. Each school shall maintain a school calendar, which provides for 180 days of instruction or the required number of instructional hours in Ed 306.18, which may result in fewer than 180 days.</p>	Revised language	

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Ed 306.20 Career and Technical Education Programs.	Ed 306.20 Career and Technical Education Programs.	Ed 306.20 Career and Technical Education Programs.	Ed 306.20 Career and Technical Education Programs.
<p>(a) Career and technical education programs (CTE), as defined in Ed 306.02(b), shall be available to meet specific educational, district and graduation requirements, as outlined below:</p> <p>(1) Every public high school shall be identified within a CTE region as established in accordance with RSA 188-E and Ed 1402, and shall be included in the regional agreement established pursuant to Ed 1402.01; and</p> <p>(2) Every public high school shall make students aware of programs available at the regional CTE center.</p>	<p>(a) Career and technical education programs (CTE), as defined in Ed 306.02(b), shall be available to meet specific educational, district and graduation requirements, as outlined below:</p> <p>(1) Every public high school shall be identified within a CTE region as established in accordance with RSA 188-E and Ed 1402, and shall be included in the regional agreement established pursuant to Ed 1402.01; and</p> <p>(2) Every public high school shall make <i>all</i> students aware of programs available at the regional CTE center.</p>	<p>Added the word "all" to paragraph 2</p>	
<p>(b) Receiving districts shall strive to make space available to every qualified student in the region who desires to participate in a program at the CTE center, in accordance with the formula for participation prescribed in, or as a result of, the respective regional agreement.</p>	<p>(b) Receiving districts shall make <i>every effort to offer opportunities</i> to every qualified student in the region who desires to participate in a program at the CTE center, in accordance with the formula for participation prescribed in, or as a result of, the respective regional agreement.</p>	<p>Revised language</p>	
	<p><i>(c) CTE cooperative agreements shall require sending and receiving school districts to coordinate calendars and schedules to maximize student access to CTE programming;</i></p>	<p>New paragraph</p>	
<p>(c) Every public high school student shall have access to programs at the regional CTE center subject to attainment of prerequisites and space availability within the program in a CTE center, and sending school budget restrictions.</p> <p>(d) Prerequisites shall include requirements to ensure:</p>	<p>(d) Every public high school student shall have access to programs at the regional CTE center subject to attainment of prerequisites and space availability within the program in a CTE center, and sending school budget restrictions.</p> <p>(e) Prerequisites shall include requirements to ensure:</p>	<p>Renumbered</p>	

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<p>(1) Successful completion of the program of core technical competencies vetted by business and industry and postsecondary institutions;</p> <p>(2) Seamless transition into postsecondary institutions; and</p> <p>(3) Employment preparedness;</p> <p>(c) Prerequisites shall have a direct and necessary relationship to the CTE program.</p> <p>Ed 306.21 <u>Alternative Programs</u></p>	<p>(1) Successful completion of the program of core technical competencies vetted by business and industry and postsecondary institutions;</p> <p>(2) Seamless transition into postsecondary institutions; and</p> <p>(3) Employment preparedness;</p> <p>(f) Prerequisites shall have a direct and necessary relationship to the CTE program.</p> <p>Ed 306.21 <u>Alternative Programs</u></p>	
<p>(a) "Alternative program" means the regular delivery of the majority of a student's instruction through classroom or other methods designed to address the needs of individual students or particular groups of students that might be different from the methods of instruction used by the standard schools of the district.</p> <p>(b) An alternative program may be housed in the same facility as a standard school or at a different location.</p> <p>(c) An alternative program shall be:</p> <p>(1) Designed to address the personalized needs of students, including, but not limited to, dropout prevention, and</p> <p>(2) Approved by the local school board in a plan that:</p> <p>a. States the goals of the program and curriculum to be provided;</p> <p>b. Specifies the procedures for assessing and implementing its program plan consistent with RSA 193-C:3, III;</p>	<p>(a) "Alternative program" means the regular delivery of the majority of a student's instruction through classroom or other methods designed to address the needs of individual students or particular groups of students that might be different from the methods of instruction used by the standard schools of the district.</p> <p>(b) An alternative program may be housed in the same facility as a standard school or at a different location.</p> <p>(c) An alternative program shall be:</p> <p>(1) Designed to address the personalized needs of students, including, but not limited to, dropout prevention, <i>soft skills, and career pathways</i>; and</p> <p>(2) Approved by the school board in a plan that:</p> <p>a. States the goals of the program and curriculum to be provided;</p> <p>b. <i>Enables students to opt into the program at the request of the family</i>;</p>	<p>No change</p>
		<p>Added language</p> <p>Added paragraph b</p> <p>Renumbered</p>
		<p>(b) This needs to be removed. It will enable people to fund private school tuition through public school money and omits the student voice.</p>

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<p>c. Specifies when the program would be offered, which may be at a time other than during the regular school day;</p> <p>d. Demonstrates how the alternative program will enable the participating students to achieve the same district and graduation competencies outlined for all students and consistent with RSA 193-C:3; and</p> <p>e. Explicitly detail how extended learning opportunities will be incorporated as a learning option for all students.</p>	<p>c. Specifies the procedures for assessing and implementing its program plan consistent with RSA 193-C:3, III;</p> <p>d. Specifies when the program would be offered, which may be at a time other than during the regular school day;</p> <p>e. Demonstrates how the alternative program will enable the participating students to achieve the same district and graduation competencies outlined for all students and consistent with RSA 193-C:3; and</p> <p>f. Details how extended learning opportunities will be incorporated as a learning option for all students.</p>	
<p>(d) Alternative programs for students with disabilities shall meet the requirements of Ed 1119.</p> <p>(e) Prior to implementing an alternative program, a school administrative unit shall submit to the department the following:</p> <p>(1) A copy of the local school board's approval, including the plan submitted;</p> <p>(2) The location of the alternative program; and</p> <p>(3) Copies of inspection reports from the municipal health officer and fire department if the alternative program is to be housed in a building other than an approved school.</p> <p>(f) Each student participating in an alternative program shall participate in the state assessment exam, when applicable.</p> <p>(g) Assignment of students to alternative programs shall be voluntary and shall require written approval from the parent or guardian.</p>	<p>(d) Alternative programs for students with disabilities shall meet the requirements of Ed 1119.</p> <p>(e) Prior to implementing an alternative program, a school administrative unit shall submit to the department the following:</p> <p>(1) A copy of the school board's approval, including the plan submitted;</p> <p>(2) The location of the alternative program; and</p> <p>(3) Copies of inspection reports from the municipal health officer and fire department if the alternative program is to be housed in a building other than an approved school.</p> <p>(f) Each student participating in an alternative program shall participate in the state assessment exam, when applicable.</p> <p>(g) Assignment of students to alternative programs shall be voluntary and shall require written approval from the parent or guardian.</p>	<p>No change</p>
	<p>(f) Each student participating in an alternative program shall participate in the state assessment exam, when applicable.</p> <p>(g) Assignment of students to alternative programs shall be voluntary and shall require written approval from the parent or guardian.</p>	<p>No change</p>

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<p>(h) Staff assigned to alternative programs shall meet the same certification requirements as staff assigned to standard schools in accordance with Ed 306.15.</p> <p>(i) Students in alternative programs shall be provided student services equivalent to those provided in standard schools including, but not limited to, food and nutrition services under Ed 306.11, health services under Ed 306.12, and guidance and counseling services under Ed 306.39.</p> <p>(j) The school year for alternative programs shall meet the requirements of Ed 306.18.</p> <p>(k) Alternative programs which result in the award of a high school diploma shall meet the requirements of Ed 306.27(q).</p> <p>(l) Alternative programs which are supervised by the principal of a standard school shall be considered part of that standard school for reporting purposes under Ed 306.23, for assessment under Ed 306.24, and for school approval under Ed 306.28.</p> <p>(m) Alternative programs which are supervised by a district level administrator shall be considered a separate school of the district for reporting purposes under Ed 306.23, for assessment under Ed 306.24, and for school approval under Ed 306.28.</p> <p>Ed 306.22 <u>Distance Education</u>.</p> <p>(a) All students shall have access to full-year, full-day instruction, in-person as required in RSA 189:1 and RSA 189:24. Distance education, as defined in Ed 306.22(b), shall not satisfy the requirement for in-person instruction except as conducted in accordance with 306.22(c).</p>	<p>(h) Staff assigned to alternative programs shall meet the same certification requirements as staff assigned to standard schools in accordance with Ed 306.15.</p> <p>(i) Students in alternative programs shall be provided student services equivalent to those provided in standard schools including, but not limited to, food and nutrition services under Ed 306.11, health services under Ed 306.12, and guidance and counseling services under Ed 306.39.</p> <p>(j) The school year for alternative programs shall meet the requirements of Ed 306.18.</p> <p>(k) Alternative programs which result in the award of a high school diploma shall meet the requirements of Ed 306.27(q).</p> <p>(l) Alternative programs which are supervised by the principal of a standard school shall be considered part of that standard school for reporting purposes under Ed 306.23, for assessment under Ed 306.24, and for school approval under Ed 306.28.</p> <p>(m) Alternative programs which are supervised by a district level administrator shall be considered a separate school of the district for reporting purposes under Ed 306.23, for assessment under Ed 306.24, and for school approval under Ed 306.28.</p> <p>Ed 306.22 <u>Distance Education</u>.</p> <p>(a) All students shall have access to full-year, full-day instruction, in-person as required in RSA 189:1 and RSA 189:24. Distance education, as defined in Ed 306.22(b), shall not satisfy the requirement for in-person instruction except as conducted in accordance with 306.22(c).</p>	
		<p>No change</p>

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<p>(b) In this section, "distance education" means any instructional mode that is not in-person instruction including, but not limited to, correspondence, video-based, internet-based, online courses, remote instruction, or any combination thereof. The term distance education also includes hybrid instructional models that utilize elements of distance education and traditional instruction in any combination.</p>	<p>(b) In this section, "distance education" means any instructional mode that is not in-person instruction including, but not limited to, correspondence, video-based, internet-based, online courses, remote instruction, or any combination thereof. The term distance education also includes hybrid instructional models that utilize elements of distance education and traditional instruction in any combination.</p>
<p>(c) Distance education may be offered only:</p> <p>(1) When inclement weather makes it unsafe to safely transport students to or from in-person instruction; or</p> <p>(2) As an option for a parent or guardian making a request for distance education.</p>	<p>(c) Distance education may be offered only:</p> <p>(1) When inclement weather makes it unsafe to safely transport students to or from in-person instruction; or</p> <p>(2) As an option for a parent or guardian making a request for distance education.</p>
<p>(d) When the district offers distance education, the school board shall be responsible for the development of a policy for the governance and administration of distance education.</p>	<p>(d) When the district offers distance education, the school board shall be responsible for the development of a policy for the governance and administration of distance education.</p>
<p>(e) If a student participating in distance education is not making educational progress, as determined by the district's educational assessments, the option to participate in distance education may be rescinded by the district.</p>	<p>(e) If a student participating in distance education is not making educational progress, as determined by the district's educational assessments, the option to participate in distance education may be rescinded by the district.</p>
<p>(f) A parent or guardian may appeal a district determination that a student is not making educational progress pursuant to the district's educational assessments to the state board of education under Ed 200.</p>	<p>(f) A parent or guardian may appeal a district determination that a student is not making educational progress pursuant to the district's educational assessments to the state board of education under Ed 200.</p>
<p>(g) A student shall remain in distance education until the conclusion of the appeal in (f) above. If</p>	<p>(g) A student shall remain in distance education until the conclusion of the appeal in (f) above. If</p>

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<p>the state board of education upholds the district's conclusion that the student is not making educational progress pursuant to the district's educational assessments, the student shall immediately be disqualified from continued participation in the district's distance education instruction.</p> <p>(h) School districts may cooperate to share delivery of distance education.</p> <p>Ed 306.23 <u>Statistical Reports; Accountability.</u></p>	<p>the state board of education upholds the district's conclusion that the student is not making educational progress pursuant to the district's educational assessments, the student shall immediately be disqualified from continued participation in the district's distance education instruction.</p> <p>(h) School districts may cooperate to share delivery of distance education.</p> <p>Ed 306.23 <u>Statistical Reports; Accountability.</u></p>	
<p>(a) Each school district shall establish a local education accountability system in order to collect data needed for evaluation of the district's compliance with state and federal laws on school accountability. The department shall integrate its accountability system with local accountability systems so as to allow for comparison and analysis of such data.</p> <p>(b) Each district shall file statistical reports with the department as required under RSA 189:28. A request from a district to the department for statistical data needed by a district for filing a statistical report shall be submitted to the department at least 60 days before the district's report is due.</p> <p>(c) Each school district required under RSA 193-H:4 to create a local education improvement plan shall file such a plan with the department within 90 days of being found to be in need of improvement under RSA 193-H:3. The plan shall be aligned to meet state goals and student performance indicators.</p> <p>Ed 306.24 <u>Assessment.</u></p>	<p>(a) Each school district shall establish a local education accountability system in order to collect data needed for evaluation of the district's compliance with state and federal laws on school accountability. The department shall integrate its accountability system with local accountability systems so as to allow for comparison and analysis of such data.</p> <p>(b) Each district shall file statistical reports with the department as required under RSA 189:28. A request from a district to the department for statistical data needed by a district for filing a statistical report shall be submitted to the department at least 60 days before the district's report is due.</p> <p>(c) Each school district required under RSA 193-H:4 to create a local education improvement plan shall file such a plan with the department within 90 days of being found to be in need of improvement under RSA 193-H:3. The plan shall be aligned to meet state goals and student performance indicators.</p> <p>Ed 306.24 <u>Assessment.</u></p> <p>(a) The school board shall require that each school:</p>	<p>No change</p> <p>No change</p>

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<p>(a) The local school board shall require that each school:</p> <p>(1) Provides for the ongoing assessment of district and graduation competencies through the use of local assessments that are aligned with state and district content and performance standards as provided in (b) below;</p> <p>(2) Participates in the state-wide education improvement and assessment program as provided in (c) below;</p> <p>(3) Participates in the New Hampshire performance assessments;</p> <p>(4) When selected by the United States Department of Education, National Center for Education Statistics participates in the National Assessment of Education Progress (NAEP); and</p> <p>(5) Supports student development of individual student digital portfolios.</p>	<p>(1) Provides for the ongoing assessment of district and graduation competencies through the use of local assessments that are aligned with state and district content and performance standards as provided in (b) below;</p> <p>(2) Participates in the state-wide education improvement and assessment program as provided in (c) below;</p> <p>(3) Participates in the New Hampshire performance assessments;</p> <p>(4) When selected by the United States Department of Education, National Center for Education Statistics participates in the National Assessment of Education Progress (NAEP); and</p> <p>(5) Supports student development of individual student digital portfolios.</p>	
<p>(b) The following elements shall be used as evidence by the department in determining whether a school complies with the requirements of (a) above:</p> <p>(1) The school has a process for the selection, use, and interpretation of local assessment instruments;</p> <p>(2) The school supports the authentic assessment of student learning outcomes through multiple formative and summative assessment instruments, including, but not limited to:</p> <p>a. Educator observation of project-based learning, including off-site learning projects;</p>	<p>(b) <i>Competency-based assessments shall be used as a component of the assessment program, and shall include the following characteristics:</i></p> <p>(1) <i>Competencies are clearly stated and measurable;</i></p> <p>(2) <i>Students advance upon mastery;</i></p> <p>(3) <i>Include varied, authentic, meaningful, and transferable assessment practices;</i></p> <p>(4) <i>Timely intervention strategies; and</i></p>	<p>Added new section (b), renumbered sections following</p>

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<p>b. Competency-based based assessments;</p> <p>c. Educator observations of student performance; and</p> <p>d. Project evaluation rubrics used to evaluate program proficiencies applied to integrated curriculum assignments, extended learning opportunities, career and technical education opportunities, and out of school learning environments;</p> <p>(3) The school provides professional development for educators in the use of diagnostic tools to adjust instruction to meet personalized needs of students and to monitor progress; and</p> <p>(4) The school has a systematic process for collecting and analyzing assessment data to:</p> <p>a. Identify needs for improvement; and</p> <p>b. Determine the effectiveness of educational programs in meeting student performance goals.</p>	<p>(5) <i>Emphasis on important learning skills and dispositions.</i></p> <p>(c) The following elements shall be used as evidence by the department in determining whether a school complies with the requirements of (a) above:</p> <p>(1) The school has a process for the selection, use, and interpretation of local assessment instruments;</p> <p>(2) The school supports the authentic assessment of student learning outcomes through multiple formative and summative assessment instruments, including, but not limited to:</p> <p>a. Educator observation of project-based learning, including off-site learning projects;</p> <p>b. Competency-based or performance based assessments;</p> <p>c. Educator observations of student performance; and</p> <p>d. Project evaluation rubrics used to evaluate program proficiencies applied to integrated curriculum assignments, extended learning opportunities, career and technical education opportunities, and out of school learning environments;</p> <p>(3) The school provides professional development for educators in the use of diagnostic tools to adjust instruction to meet personalized needs of students and to monitor progress; and</p> <p>(4) The school has a systematic process for collecting and analyzing assessment data to:</p>	

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<p>(c) Each school shall maintain the following as evidence of participation in the state-wide education improvement and assessment program established under RSA 193-C:</p> <p>(1) Written guidelines for the inclusion of and accommodations for student participation, including, but not limited to, inclusion of and accommodations for:</p> <ul style="list-style-type: none"> a. Students in major racial and ethnic groups; b. Students with disabilities; c. Economically disadvantaged students; and d. Students with limited English proficiency; <p>(2) Procedures for test security and the accurate inclusion of student data; and</p> <p>(3) Procedures by which assessment results are communicated to:</p> <ul style="list-style-type: none"> a. Parents; b. Faculty; and c. The community. <p>(d) For programs at all K-12 levels, schools shall report the academic performance of all students on a regular basis by providing the following:</p>	<p>a. Identify needs for improvement; and</p> <p>b. Determine the effectiveness of educational programs in meeting student performance goals.</p> <p>(d) Each school shall maintain the following as evidence of participation in the state-wide education improvement and assessment program established under RSA 193-C:</p> <p>(1) Written guidelines for the inclusion of and accommodations for student participation, including, but not limited to, inclusion of and accommodations for:</p> <ul style="list-style-type: none"> a. Students in major racial and ethnic groups; b. Students with disabilities; c. Economically disadvantaged students; and d. Students with limited English proficiency; <p>(2) Procedures for test security and the accurate inclusion of student data; and</p> <p>(3) Procedures by which assessment results are communicated in a timely manner to:</p> <ul style="list-style-type: none"> a. Parents; b. Faculty; and c. The community. <p>(d) For programs at all K-12 levels, schools shall report the academic performance of all students on a regular basis by providing the following:</p>	<p>Added "in a timely manner"</p>	<p>Will there be a requirement for the department to communicate results in a timely manner as well? How will it be defined?</p>
		<p>No change</p>	

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<p>(1) A summary of individual student performance to parents at least 3 times each year; and</p> <p>(2) The opportunity for parents to meet individually with each of their students' teachers about their students' performance at least once during each school year.</p> <p>(a) If a district employs a school psychologist as an optional service pursuant to RSA 189:49, IV, the standards in (b)-(e) below shall apply. Nothing in this section shall prevent a school district from contracting services with a qualified school psychologist.</p>	<p>(1) A summary of individual student performance to parents at least 3 times each year; and</p> <p>(2) The opportunity for parents to meet individually with each of their students' teachers about their students' performance at least once during each school year.</p> <p>(a) If a district employs a school psychologist as an optional service pursuant to RSA 189:49, IV, the standards in (b)-(e), in addition to the requirements below, shall apply.</p> <p>(1) Nothing in this section shall prevent a school district from contracting services with a qualified school psychologist.</p> <p>(2) All such psychological services must comply with federal Every Student Succeeds Act requirements, including informed written consent; and</p> <p>(3) All such services must comply with state and federal student privacy laws and rules.</p>	<p>Revised language</p>
<p>(b) Employing school districts shall require that school psychological services are provided by certified school psychologists in a coordinated, organized fashion, and are deployed in a manner that results in the provision of a comprehensive continuum of services. Comprehensive school psychological services shall be based on this section and The National Association of School Psychologists (NASP) Model for Comprehensive and Integrated School Psychological Services, published by NASP in 2010 as referenced in Appendix II.</p> <p>(c) The school psychologist shall provide comprehensive psychological services throughout</p>	<p>(b) Employing school districts shall require that school psychological services are provided by certified school psychologists in a coordinated, organized fashion, and are deployed in a manner that results in the provision of a comprehensive continuum of services. Comprehensive school psychological services shall be based on this section and The National Association of School Psychologists (NASP) Model for Comprehensive and Integrated School Psychological Services, published by NASP in 2010 as referenced in Appendix II.</p> <p>(c) The school psychologist shall provide comprehensive psychological services throughout</p>	<p>Added new paragraphs</p> <p>No change</p>

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<p>various learning environments to help children and youth develop academic, social, behavioral, and emotional competence through:</p>	<p>various learning environments to help children and youth develop academic, social, behavioral, and emotional competence through:</p>	
<p>(1) Data-based decision making and accountability methods that use psycho-educational assessment results, data collection strategies, and technology resources to design and implement services and programs and to evaluate outcomes;</p>	<p>(1) Data-based decision making and accountability methods that use psycho-educational assessment results, data collection strategies, and technology resources to design and implement services and programs and to evaluate outcomes;</p>	<p>Replaced instructional with learning</p>
<p>(2) Consultation, collaboration, and communication with educators, families, health care professionals including mental health, social services and other systems to promote effective and coordinated implementation of services;</p>	<p>(2) Consultation, collaboration, and communication with educators, families, health care professionals including mental health, social services and other systems to promote effective and coordinated implementation of services;</p>	
<p>(3) Interventions and instructional supports to develop academic skills, incorporating available research and assessment data to develop and implement evidence based instructional strategies designed to support students' cognitive and academic skills;</p>	<p>(3) Interventions and <i>learning</i> supports to develop academic skills, incorporating available research and assessment data to develop and implement evidence based instructional strategies designed to support students' cognitive and academic skills;</p>	
<p>(4) Interventions and mental health services to develop social and life skills in collaboration with others, using assessment and data collection methods to implement and evaluate developmentally appropriate services that support socialization, learning, and mental health;</p>	<p>(4) Interventions and mental health services to develop social and life skills in collaboration with others, using assessment and data collection methods to implement and evaluate developmentally appropriate services that support socialization, learning, and mental health;</p>	
<p>(5) School-wide practices to promote learning, developing and implementing evidence-based practices and strategies to create and maintain effective and supportive learning environments for children and others, including multi-tiered systems, to support students' academic, social, emotional, and behavioral goals;</p>	<p>(5) School-wide practices to promote learning, developing and implementing evidence-based practices and strategies to create and maintain effective and supportive learning environments for children and others, including multi-tiered systems, to support students' academic, social, emotional, and behavioral goals;</p>	
	<p>(6) Preventative and responsive services employing theories and research related to resilience, risk</p>	

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<p>(6) Preventative and responsive services employing theories and research related to resilience, risk factors, and multi-tiered prevention, to support evidence based strategies for effective counseling, crisis response, and behavioral intervention;</p> <p>(7) Family-school collaboration services to facilitate and provide effective collaborative partnerships between families and schools that support children's learning and mental health utilizing a strength-based, culturally sensitive approach;</p> <p>(8) Diversity in development and learning to provide professional services that promote effective functioning for individuals, families and schools with diverse characteristics, cultures and backgrounds, across multiple contexts;</p> <p>(9) Research and program evaluation to support educational decision-making and evaluate programs; and</p> <p>(10) Legal, ethical, and professional practice consistent with legal requirements and ethical and professional standards including the NASP Principles of Professional Ethics (2010) as referenced in Appendix II.</p>	<p>factors, and multi-tiered prevention, to support evidence based strategies for effective counseling, crisis response, and behavioral intervention;</p> <p>(7) Family-school collaboration services to facilitate and provide effective collaborative partnerships between families and schools that support children's learning and mental health utilizing a strength-based, culturally sensitive approach;</p> <p>(8) Diversity in development and learning to provide professional services that promote effective functioning for individuals, families and schools with diverse characteristics, cultures and backgrounds, across multiple contexts;</p> <p>(9) Research and program evaluation to support educational decision-making and evaluate programs; and</p> <p>(10) Legal, ethical, and professional practice consistent with legal requirements and ethical and professional standards including the NASP Principles of Professional Ethics (2010) as referenced in Appendix II.</p>	
<p>(d) School psychologists shall utilize assessment findings to diagnose educational and behavioral disorders and to facilitate educational treatment planning.</p> <p>(e) Employing school districts shall ensure that an effective program of supervision and evaluation of school psychological services exists. School psychologists in cooperation with their employing districts or agencies shall be responsible for the</p>	<p>(d) School psychologists shall utilize assessment findings to diagnose educational and behavioral disorders and to facilitate educational treatment planning.</p> <p>(e) Employing school districts shall ensure that an effective program of supervision and evaluation of school psychological services exists. School psychologists in cooperation with their employing districts or agencies shall be responsible for the</p>	<p>No change</p>

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<p>overall development, implementation and professional supervision of school psychological service programs.</p> <p>(f) Professional supervision shall be available to all school psychologists to an extent sufficient to ensure the provision of effective and accountable services. Beginning school psychologists in their first year of employment as a school psychologist shall receive a minimum of one hour of face-to-face supervision contact per week. Supervisors shall meet Ed 500 requirements for certification as a school psychologist and have at least 3 years of professional experience as a school psychologist in a school system.</p>	<p>overall development, implementation and professional supervision of school psychological service programs.</p> <p>(f) Professional supervision shall be available to all school psychologists to an extent sufficient to ensure the provision of effective and accountable services. Beginning school psychologists in their first year of employment as a school psychologist shall receive a minimum of one hour of face-to-face supervision contact per week. Supervisors shall meet Ed 500 requirements for certification as a school psychologist and have at least 3 years of professional experience as a school psychologist in a school system.</p> <p>(g) Employing school districts shall insure that parental consent and student information are protected as required under applicable state and federal law.</p>
<p>Ed 306.26 <u>Kindergarten Through Grade 8 School Curriculum.</u></p> <p>(a) The local school board shall require that in each school there is:</p> <p>(1) A broad and well-balanced elementary school curriculum that outlines district competencies for the grade 1-8 program in compliance with RSA 193-C:3, III; and</p> <p>(2) An instructional program that includes:</p> <ol style="list-style-type: none"> Procedures for diagnosing learner needs, learning styles, and interests; Methods and strategies for teaching students; Research-based learning opportunities. 	<p>Ed 306.26 <u>Kindergarten Through Grade 8 School Curriculum.</u></p> <p>(a) The school board shall require that in each school there is:</p> <p>(1) A broad and well-balanced elementary school curriculum that outlines competencies for the learning level 1-8 program in compliance with RSA 193-C:3, III; and</p> <p>(2) A learning program that includes:</p> <ol style="list-style-type: none"> Procedures for identifying learner needs, learning styles, and interests; Methods and strategies for facilitating learning; Research-based learning opportunities.

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<p>d. Techniques for the evaluation of student outcomes, including performance assessment of district competencies; and</p> <p>e. Provision of differentiated instruction for students based on learning styles, needs, and interests.</p> <p>(b) The local school board shall adopt, for each school, a broad and well-balanced kindergarten curriculum that outlines a play-based kindergarten program in compliance with RSA 93-E:2-a, II-a that supports:</p> <p>(1) Unstructured time built into the school day for the discovery of, and methods and strategies for the fostering of, each child's individual talents, abilities, and needs;</p> <p>(2) Child development and learning in all domains, including, but not limited to:</p> <ul style="list-style-type: none"> a. Physical; b. Social; c. Cognitive; and d. Language; <p>(3) Child-directed experiences based upon the district's identified early childhood best teaching practices and play-based learning that comprise:</p> <ul style="list-style-type: none"> a. Movement; b. Creative expression; c. Exploration; 	<p>d. Techniques for the evaluation of student outcomes, including performance assessment of competencies; and</p> <p>e. Provision of differentiated instruction for students based on learning styles, needs, and interests.</p> <p>(b) The school board shall adopt <i>where applicable</i>, for each school, a broad and well-balanced kindergarten school curriculum that outlines a play-based kindergarten program in compliance with RSA 93-E:2-a, II-a that supports:</p> <p>(1) Unstructured time built into the school day for the discovery of, and methods and strategies for the fostering of, each child's individual talents, abilities, and needs;</p> <p>(2) Child development and learning in all domains, including, but not limited to:</p> <ul style="list-style-type: none"> a. Physical; b. Social; c. Cognitive; and d. Language; <p>(3) Child-directed experiences based upon the district's identified early childhood best <i>learning</i> practices and play-based learning that comprise:</p> <ul style="list-style-type: none"> a. Movement; b. Creative expression; c. Exploration; 	<p>Revised language</p>
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<p>d. Socialization; and e. Music; and (4) A guided-reading literacy program. (c) The local school board shall adopt, for each school, a local time schedule which specifies the distribution of instructional time among the following learning areas to be taught in grades 1-8 at all learning levels in the school: (1) For the elementary grades 1-8, where no middle school has been established by vote of the local school board: a. Ed 306.31, relative to an arts education; b. Ed 306.37, relative to an English/language arts and reading program; c. Ed 306.40, relative to a health education program; d. Ed 306.41, relative to a physical education program; e. Ed 306.42, relative to digital literacy program; f. Ed 306.43, relative to a mathematics program; g. Ed 306.45, relative to a science education; and h. Ed 306.46, relative to a social studies program; and</p>	<p>d. Socialization; and e. Music; and (4) A guided-reading literacy program. (c) The school board shall adopt, for each school, a local time schedule which specifies the distribution of instructional time among the following learning areas to be taught in grades 1-8 at all learning levels in the school: (1) For the elementary grades 1-8, where no middle school has been established by vote of the school board: a. Ed 306.31, relative to a <i>competency based</i> arts education <i>program</i>; b. Ed 306.37, relative to a <i>competency-based</i> English/language arts and reading program; c. Ed 306.40, relative to a <i>competency-based</i> health education program; d. Ed 306.41, relative to a <i>competency-based</i> physical education program; e. Ed 306.42, relative to a <i>competency-based</i> digital literacy program; f. Ed 306.43, relative to a <i>competency-based</i> mathematics program; g. Ed 306.45, relative to a <i>competency-based</i> science education; and h. Ed 306.46, relative to a <i>competency-based</i> social studies program; and (2) For middle school:</p>	<p>Revised language</p>
<p>(2) For middle school:</p>	<p>(2) For middle school:</p>	<p>Revised language</p>

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<p>a. Ed 306.31, relative to an arts education;</p> <p>b. Ed 306.37, relative to an English/language arts and reading program;</p> <p>c. Ed 306.40, relative to a health education program;</p> <p>d. Ed 306.41, relative to a physical education program;</p> <p>e. Ed 306.38, relative to a family and consumer science education;</p> <p>f. Ed 306.42, relative to digital literacy program;</p> <p>g. Ed 306.43, relative to a mathematics program;</p> <p>h. Ed 306.45, relative to a science education;</p> <p>i. Ed 306.46, relative to a social studies program; and</p> <p>j. Ed 306.47, relative to a technology and engineering education.</p>	<p>a. Ed 306.31, relative to a competency-based arts education program;</p> <p>b. Ed 306.37, relative to a competency-based English/language arts and reading program.</p> <p>c. Ed 306.40, relative to a competency-based health education program;</p> <p>d. Ed 306.41, relative to a competency-based physical education program;</p> <p>e. Ed 306.38, relative to a competency-based family and consumer science education;</p> <p>f. Ed 306.42, relative to a competency-based digital literacy program;</p> <p>g. Ed 306.43, relative to a competency-based mathematics program;</p> <p>h. Ed 306.45, relative to a competency-based science education;</p> <p>i. Ed 306.46, relative to a competency-based social studies program; and</p> <p>j. Ed 306.47, relative to a competency-based technology and engineering education.</p>	<p>(d) If the local school board determines that one or more world languages might be offered at a middle school in the district, the local school board shall develop a policy for each middle school relative to providing supplemental instruction in one or more world languages, including the extent of this instruction and the students to whom it is offered.</p> <p>(c) If a co-curricular program is offered, it shall consist of those activities that are designed to supplement and enrich regular academic instruction.</p>	<p>Removed local to conform with definition</p> <p>No change</p>
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<p>provide opportunities for social development, and encourage participation in clubs, athletics, performing groups, and service to school and community.</p>	<p>provide opportunities for social development, and encourage participation in clubs, athletics, performing groups, and service to school and community.</p>	
<p>(f) The local school board shall develop a policy that grants acknowledgement of achievement to students taking coursework in the seventh or eighth grade toward high school graduation, if the course demonstrates district or graduation competencies consistent with related high school course(s) and the student achieves satisfactory standards of performance.</p> <p>(g) If a district chooses to offer extended learning opportunities in a middle school, the extended learning opportunities shall:</p> <ol style="list-style-type: none"> (1) Consist of activities designed to: <ol style="list-style-type: none"> a. Provide credit or supplement regular academic courses; and b. Promote the schools and individual students' educational goals and objectives; (2) Be governed by a policy adopted by the local school board that: <ol style="list-style-type: none"> a. Provides for the administration and supervision of the program; b. Outlines how certified school personnel oversee an individual student's program; c. Requires that each extended learning proposal meet rigorous measurable standards and be approved by the school prior to its beginning; d. Specifies whether or not credit can be granted for extended learning activities, including, but not 	<p>Removed</p>	
<p>(f) <i>If a middle school student requests an ELO, the school shall make every reasonable effort to accommodate them. The extended learning opportunities shall:</i></p> <ol style="list-style-type: none"> (1) Consist of activities designed to: <ol style="list-style-type: none"> a. Provide the opportunity to develop and demonstrate achievement of competencies; and b. Promote the schools and individual students' educational goals and objectives; (3) Requires that acknowledgement of achievement for an extended learning activity be approved by a certified educator; (4) Incorporate student participation in selecting, organizing, and carrying out extended learning opportunities; (5) Provide opportunities for students to acquire knowledge and skill development comparable to knowledge and skill development in courses offered at the high school; and 	<p>Paragraph (2)(a-d) moved to Ed 306.04 section</p> <p>Renumbered</p> <p>Revised language</p>	

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<p>limited to, independent study, private instruction, team sports, performing groups, internships, community service, and work study; and</p> <p>e. Requires that acknowledgement of achievement for an extended learning activity be approved by a certified educator;</p> <p>(3) Incorporate student participation in selecting, organizing, and carrying out extended learning activities;</p> <p>(4) Provide opportunities for students to acquire knowledge and skill development comparable to knowledge and skill development in courses offered at the high school; and</p> <p>(5) Be available to all students.</p>		<p>(5) Be available to all students.</p>	Correct numbering
<p>(h) The local school board shall require, and each district shall establish, and provide instruction in, Holocaust and genocide education as described in Ed 306.49, implemented no later than 8th grade as a component of a course in social studies. Nothing in this paragraph shall be construed to prevent developmentally appropriate instruction in Holocaust and genocide studies prior to 8th grade or as a component of other learning areas.</p> <p><u>Ed 306.27 High School Curriculum, Credits, Graduation Requirements, and Cocurricular Program.</u></p>	<p>(g) The school board shall require, and each district shall establish, and provide instruction in, Holocaust and genocide education as described in Ed 306.49, implemented no later than 8th grade as a component of a course in social studies. Nothing in this paragraph shall be construed to prevent developmentally appropriate instruction in Holocaust and genocide studies prior to 8th grade or as a component of other learning areas.</p> <p><u>Ed 306.27 High School Curriculum, Credits, Graduation Requirements, and Cocurricular Program.</u></p>	<p>(g) The school board shall require, and each district shall establish, and provide instruction in, Holocaust and genocide education as described in Ed 306.49, implemented no later than 8th grade as a component of a course in social studies. Nothing in this paragraph shall be construed to prevent developmentally appropriate instruction in Holocaust and genocide studies prior to 8th grade or as a component of other learning areas.</p>	Renumbered
<p>(a) The local school board shall require that the curriculum content developed for each high school outlines district and graduation competencies and is consistent with RSA 193-C:3, III.</p> <p>(b) The required curriculum content shall comply with the following:</p>	<p>(a) The school board shall require that the curriculum content developed for each high school outlines competencies and is consistent with RSA 193-C:3, III.</p> <p>(b) The required curriculum content shall comply with the following:</p>	<p>(a) The school board shall require that the curriculum content developed for each high school outlines competencies and is consistent with RSA 193-C:3, III.</p> <p>(b) The required curriculum content shall comply with the following:</p>	Revised language

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<p>(1) The program of studies shall include those courses in which students demonstrate achievement as well as other educational experiences and instructional activities required by Ed 306.</p> <p>(2) Courses shall be planned for the attainment of specific educational district and graduation competencies leading to the high school diploma.</p> <p>(3) The instructional program shall include:</p> <ul style="list-style-type: none"> a. Procedures for diagnosing learner needs; b. Methods and strategies for teaching that incorporate learner needs; c. Resource-based learning opportunities; d. Techniques for the evaluation of student outcomes, including performance assessment of district competencies; and e. The provision of remedial instruction as needed. 	<p>(1) The program of studies shall include those courses in which students demonstrate achievement of <i>competencies</i> as well as other educational experiences and instructional activities required by Ed 306.</p> <p>(2) Courses shall be planned for the attainment of specific competencies leading to the high school diploma;</p> <p>(3) <i>Learning opportunities</i> shall include:</p> <ul style="list-style-type: none"> a. Procedures for diagnosing learner needs; b. Methods and strategies that incorporate learner needs; c. Resource-based learning opportunities; d. Techniques for the evaluation of student outcomes, including performance assessment of competencies; and e. The provision of remedial instruction as needed. 	<p>Revised language</p>
<p>(4) Districts shall develop local policies that identify how the district shall engage students in creating and supporting extended learning opportunities that occur outside of the physical school building and outside of the usual school day in which students demonstrate achievement as well as other educational experiences and instructional activities required by Ed 306.</p> <p>(5) The extended learning opportunities in (4) above shall:</p> <ul style="list-style-type: none"> a. Consist of activities designed to: 1. Provide acknowledgement of achievement or supplement regular academic courses; and 	<p>Removed, redundant based on (4) below</p>	<p>Revised language</p>
<p>(4) Extended learning opportunities shall:</p> <ul style="list-style-type: none"> a. Consist of activities designed to: 1. Provide acknowledgement of achievement or supplement <i>traditional academic experiences</i>; and 	<p>Revised language</p>	<p>Revised language</p>

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<p>2. Promote the school's and individual students' educational goals and objectives;</p> <p>b. Be governed by a policy adopted by the local school board that:</p> <ol style="list-style-type: none"> 1. Provides for the administration and supervision of the program; 2. Outlines how certified school personnel will oversee, although not necessarily lead, facilitate, or coordinate, an individual student's program; 3. Requires that each extended learning proposal be aligned with district and graduation competencies consistent with RSA 193-C:3 that students are expected to demonstrate for graduation, and be approved by the school prior to its beginning; 4. Specifies that students will be able to attain acknowledgement of achievement through mastery of district or graduation competencies for extended learning activities, including, but not limited to, independent study, private instruction, team sports, performing groups, internships, community service, and work study; and 5. Requires that acknowledgement of achievement shall be based on a student's demonstration of district or graduation competencies, as approved by a certified educator; 	<p>2. Promote the school's and individual students' educational goals and objectives;</p> <p>b. Be governed by a policy adopted by the school board that:</p> <ol style="list-style-type: none"> 1. Provides for the administration and supervision of the program; 2. Outlines how certified school personnel will oversee, facilitate, or coordinate, an individual student's program; 3. Requires that each extended learning opportunity proposal be aligned with competencies and be approved by the school; 4. Specifies that students will be able to attain acknowledgement of achievement through proficiency of competencies for extended learning opportunities; and 5. Requires that credit shall be granted for any subject when a student is able to demonstrate proficiency in the required competencies, that were approved by the school or a certified educator; 	<p>Schools do not approve credits people do</p>
<p>d. Be available to all students; and</p> <p>(6) A co-curricular program shall be offered that provides opportunities for all students to participate</p>	<p>c. Incorporate student participation in selecting, organizing, and carrying out extended learning opportunities; and</p> <p>d. Be available to all students; and</p> <p>(5) A co-curricular program shall be offered that provides opportunities for all students to participate</p>	<p>No change</p>
<p>Renumbered</p>		

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<p>in activities designed to meet their needs and interests, including, but not limited to:</p> <ol style="list-style-type: none"> a. Intramural and interscholastic athletics; b. Performing groups; c. Academic clubs and societies; d. Student government; e. Activities and services that afford students with disabilities an equal opportunity to participate; and f. Any other activities that: <ol style="list-style-type: none"> 1. Supplement and enrich regular academic courses; 2. Provide opportunities for social development; 3. Encourage participation in the arts, athletics, and other cooperative groups; and 4. Encourage service to school and community. <p>(c) The local school board shall require that a program of studies shall be offered for each high school that enables each student to engage in and demonstrate achievement outlined for graduation as well as other educational experiences and instructional activities as follows:</p> <ol style="list-style-type: none"> (1) Ed 306.31, relative to an arts education; (2) Ed 306.33, relative to a business education; (3) Ed 306.34, relative to a career and technical education; (4) Ed 306.35, relative to a career education; 	<p>in activities designed to meet their needs and interests, including, but not limited to:</p> <ol style="list-style-type: none"> a. Intramural and interscholastic athletics; b. Performing groups; c. Academic clubs and societies; d. Student government; e. Activities and services that afford students with disabilities an equal opportunity to participate; and f. Any other activities that: <ol style="list-style-type: none"> 1. Supplement and enrich regular academic courses; 2. Provide opportunities for social development; 3. Encourage participation in the arts, athletics, and other cooperative groups; and 4. Encourage service to school and community. <p>(c) The school board shall require that a program of studies shall be offered for each high school that enables each student to engage in and demonstrate achievement outlined for graduation as well as other educational experiences and <i>learning</i> activities as follows:</p> <ol style="list-style-type: none"> (1) Ed 306.31, relative to a <i>competency-based</i> arts education; (2) Ed 306.33, relative to a <i>competency-based</i> business education; (3) Ed 306.34, relative to a <i>competency-based</i> career and technical education; 	
		<p style="text-align: center;">Revised language</p>

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<p>(5) Ed 306.37, relative to an English/language arts and reading program;</p> <p>(6) Ed 306.38, relative to a family and consumer science education;</p> <p>(7) Ed 306.39, relative to a school counseling program;</p> <p>(8) Ed 306.40, relative to a health education program;</p> <p>(9) Ed 306.41, relative to a physical education program;</p> <p>(10) Ed 306.42, relative to digital literacy program;</p> <p>(11) Ed 306.43, relative to a mathematics program;</p> <p>(12) Ed 306.44, relative to a computer science education;</p> <p>(13) Ed 306.45, relative to a science education;</p> <p>(14) Ed 306.46, relative to a social studies program;</p> <p>(15) Ed 306.47, relative to a technology and engineering education;</p> <p>(16) Ed 306.48, relative to a world languages program; and</p> <p>(17) Ed 306.27(b)(4), relative to extended learning opportunities.</p>	<p>(4) Ed 306.37, relative to a <i>competency-based</i> English/language arts and reading program;</p> <p>(5) Ed 306.38, relative to a <i>competency-based</i> family and consumer science education;</p> <p>(6) Ed 306.39, relative to a <i>competency-based</i> school counseling program;</p> <p>(7) Ed 306.40, relative to a <i>competency-based</i> health education program;</p> <p>(8) Ed 306.41, relative to a <i>competency-based</i> physical education program;</p> <p>(9) Ed 306.42, relative to a <i>competency-based</i> digital literacy program;</p> <p>(10) Ed 306.43, relative to a <i>competency-based</i> mathematics program;</p> <p>(11) Ed 306.44, relative to a <i>competency-based</i> computer science education;</p> <p>(12) Ed 306.45, relative to a <i>competency-based</i> science education;</p> <p>(13) Ed 306.46, relative to a <i>competency-based</i> social studies program;</p> <p>(14) Ed 306.47, relative to a <i>competency-based</i> technology and engineering education;</p> <p>(15) Ed 306.48, relative to a <i>competency-based</i> world languages program; and</p> <p>(16) Ed 306.27(b)(4), relative to <i>competency-based</i> extended learning opportunities.</p>	
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<p>(d) Each high school shall offer maximum student opportunities, in and out of the classroom, while at the same time specifying a basic number of courses that each high school shall offer.</p> <p>(e) A student shall receive acknowledgement of achievement of the competencies contained within the course, shall be awarded course credit, and shall be eligible to take another course when the following is met:</p> <p>(1) The student demonstrates knowledge and skills on an assessment approved by the local school district for a particular course; or</p> <p>(2) The student demonstrates knowledge and skills on an assessment approved by the department if the local school district has not developed an assessment.</p> <p>(f) Department approved assessments shall include assessments that measure achievement of the competencies contained within the course.</p> <p>(g) The local school board shall require that graduation be based on mastery of required graduation competencies as demonstrated through the accumulation of credits as outlined in Table 306-3 and by a certified educator. Each high school shall determine how completion of a classroom course, career and technical education courses, independent study, distance learning opportunity can support student achievement and demonstration of district or graduation competencies.</p> <p>(h) Credits shall be based on the demonstration of district and/or graduation competencies not on time spent achieving these competencies. The credit shall equate to the level of rigor and achievement necessary to master competencies that have been</p>	<p>(d) Each high school shall offer maximum student opportunities, in and out of the classroom, while at the same time specifying a basic number of courses that each high school shall offer.</p> <p>(c) A student shall receive acknowledgement of achievement of the competencies contained within the course, shall be awarded course credit, and shall be eligible to take another course when the following is met:</p> <p>(1) The student demonstrates knowledge and skills on an assessment approved by the school district for a particular course; or</p> <p>(2) The student demonstrates knowledge and skills on an assessment approved by the department if the school district has not developed an assessment.</p> <p>(f) Department approved assessments shall include assessments that measure achievement of the competencies contained within the course.</p> <p>(g) The school board shall require that graduation be based on acknowledgment of competencies at a proficient level as demonstrated through the accumulation of credits as outlined in Table 306-3. Each high school shall ensure that completion of a classroom course, career and technical education courses, independent study, distance learning course, or extended learning opportunity can support student achievement and demonstration of competencies.</p> <p>(h) Credits shall be based on the demonstration of competencies and not on time spent achieving these competencies.</p>	<p>No change</p>	<p>No change</p>
<p>(1) The student demonstrates knowledge and skills on an assessment approved by the local school district for a particular course; or</p> <p>(2) The student demonstrates knowledge and skills on an assessment approved by the department if the local school district has not developed an assessment.</p> <p>(f) Department approved assessments shall include assessments that measure achievement of the competencies contained within the course.</p> <p>(g) The local school board shall require that graduation be based on mastery of required graduation competencies as demonstrated through the accumulation of credits as outlined in Table 306-3 and by a certified educator. Each high school shall determine how completion of a classroom course, career and technical education courses, independent study, distance learning opportunity can support student achievement and demonstration of district or graduation competencies.</p> <p>(h) Credits shall be based on the demonstration of district and/or graduation competencies not on time spent achieving these competencies. The credit shall equate to the level of rigor and achievement necessary to master competencies that have been</p>	<p>(1) The student demonstrates knowledge and skills on an assessment approved by the school district for a particular course; or</p> <p>(2) The student demonstrates knowledge and skills on an assessment approved by the department if the school district has not developed an assessment.</p> <p>(f) Department approved assessments shall include assessments that measure achievement of the competencies contained within the course.</p> <p>(g) The school board shall require that graduation be based on acknowledgment of competencies at a proficient level as demonstrated through the accumulation of credits as outlined in Table 306-3. Each high school shall ensure that completion of a classroom course, career and technical education courses, independent study, distance learning course, or extended learning opportunity can support student achievement and demonstration of competencies.</p> <p>(h) Credits shall be based on the demonstration of competencies and not on time spent achieving these competencies.</p>	<p>Removed local to conform with definition</p>	<p>Ultimately it is the responsibility of the Principal, not the building itself to ensure</p> <p>Either all are singular or all are plural.</p>
<p>(1) The student demonstrates knowledge and skills on an assessment approved by the local school district for a particular course; or</p> <p>(2) The student demonstrates knowledge and skills on an assessment approved by the department if the local school district has not developed an assessment.</p> <p>(f) Department approved assessments shall include assessments that measure achievement of the competencies contained within the course.</p> <p>(g) The local school board shall require that graduation be based on mastery of required graduation competencies as demonstrated through the accumulation of credits as outlined in Table 306-3 and by a certified educator. Each high school shall determine how completion of a classroom course, career and technical education courses, independent study, distance learning opportunity can support student achievement and demonstration of district or graduation competencies.</p> <p>(h) Credits shall be based on the demonstration of district and/or graduation competencies not on time spent achieving these competencies. The credit shall equate to the level of rigor and achievement necessary to master competencies that have been</p>	<p>(1) The student demonstrates knowledge and skills on an assessment approved by the school district for a particular course; or</p> <p>(2) The student demonstrates knowledge and skills on an assessment approved by the department if the school district has not developed an assessment.</p> <p>(f) Department approved assessments shall include assessments that measure achievement of the competencies contained within the course.</p> <p>(g) The school board shall require that graduation be based on acknowledgment of competencies at a proficient level as demonstrated through the accumulation of credits as outlined in Table 306-3. Each high school shall ensure that completion of a classroom course, career and technical education courses, independent study, distance learning course, or extended learning opportunity can support student achievement and demonstration of competencies.</p> <p>(h) Credits shall be based on the demonstration of competencies and not on time spent achieving these competencies.</p>	<p>No change</p>	<p>Revised language</p>
<p>(1) The student demonstrates knowledge and skills on an assessment approved by the local school district for a particular course; or</p> <p>(2) The student demonstrates knowledge and skills on an assessment approved by the department if the local school district has not developed an assessment.</p> <p>(f) Department approved assessments shall include assessments that measure achievement of the competencies contained within the course.</p> <p>(g) The local school board shall require that graduation be based on mastery of required graduation competencies as demonstrated through the accumulation of credits as outlined in Table 306-3 and by a certified educator. Each high school shall determine how completion of a classroom course, career and technical education courses, independent study, distance learning opportunity can support student achievement and demonstration of district or graduation competencies.</p> <p>(h) Credits shall be based on the demonstration of district and/or graduation competencies not on time spent achieving these competencies. The credit shall equate to the level of rigor and achievement necessary to master competencies that have been</p>	<p>(1) The student demonstrates knowledge and skills on an assessment approved by the school district for a particular course; or</p> <p>(2) The student demonstrates knowledge and skills on an assessment approved by the department if the school district has not developed an assessment.</p> <p>(f) Department approved assessments shall include assessments that measure achievement of the competencies contained within the course.</p> <p>(g) The school board shall require that graduation be based on acknowledgment of competencies at a proficient level as demonstrated through the accumulation of credits as outlined in Table 306-3. Each high school shall ensure that completion of a classroom course, career and technical education courses, independent study, distance learning course, or extended learning opportunity can support student achievement and demonstration of competencies.</p> <p>(h) Credits shall be based on the demonstration of competencies and not on time spent achieving these competencies.</p>	<p>Revised language</p>	<p>Revised language</p>

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<p>designed to demonstrate the knowledge and skills necessary to progress toward college level and career work.</p>	<p>(i) Students may receive acknowledgement of achievement for graduation competencies through student demonstration of a collection of work or other assessment evidence gained through prior learning activities.</p> <p>(j) The items in (c) above shall not limit opportunities to develop programs that meet the needs of each student.</p> <p>(k) The programs of studies in (c) above may be offered and coordinated individually or through interdisciplinary studies.</p> <p>(l) Students shall engage with and apply English and mathematics graduation competencies during every year they are enrolled in high school even if graduation competencies for English and mathematics have been demonstrated. Such engagement may occur through integration of these graduation competencies in courses focused on content areas other than English or mathematics. Such engagement shall support students to be college and career ready in mathematics and English/language arts. Nothing contained in this section shall preclude a school or district from offering courses and other learning opportunities in addition to the minimum outlined in Ed 306.</p>	<p>(i) Students may receive acknowledgement of achievement for competencies through student demonstration of a <i>defensible</i> collection of work or other assessment evidence <i>at a proficient level</i> gained through learning activities.</p> <p>(j) The items in (c) above shall not limit opportunities to develop programs that meet the needs of each student.</p> <p>(k) The programs of studies in (c) above may be offered and coordinated individually or through interdisciplinary studies.</p> <p>(l) Students shall engage with and apply English/language arts and mathematics competencies during every year they are enrolled in high school. Such engagement may occur through integration of competencies in courses focused on content areas other than English/language arts or mathematics. Nothing contained in this section shall preclude a school or district from offering courses and other learning opportunities in addition to the minimum outlined in Ed 306.</p>	<p>Revised language</p> <p>No change</p> <p>Revised language</p> <p>Revised language</p>	<p>Defensible by what standard? Please define.</p> <p>Understand the intent, but the language is contrary to paragraph above. How will this apply to a student that only needs elective courses in their 4th or 5th year that have no tangible competency to this requirement? Is this a necessary requirement for school approval?</p>
<p>(m) There shall be a minimum of 20 credits for a regular high school diploma, unless the local school board has set a requirement of more than 20 credits for a regular high school diploma, in which case the local credit requirement shall apply. The local school board shall require that each high school offers courses or learning opportunities as specified in (c) above.</p>	<p>(m) There shall be a minimum of 20 credits for a regular high school diploma, unless the school board has set a requirement of more than 20 credits for a regular high school diploma, in which case the local credit requirement shall apply. The school board shall require that each high school offers courses or learning opportunities as specified in (c) above.</p>	<p>(m) There shall be a minimum of 20 credits for a regular high school diploma, unless the school board has set a requirement of more than 20 credits for a regular high school diploma, in which case the local credit requirement shall apply. The school board shall require that each high school offers courses or learning opportunities as specified in (c) above.</p>	<p>Revised language</p>	

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	Revised language	
<p>(n) The following shall apply relative to the required program of studies:</p> <p>(1) Consistent with Ed 306, the local school board shall verify in writing to the commissioner that each high school shall offer a total of at least 43 courses distributed as shown in Table 306-1 when the school seeks approval or renewal of approval under Ed 306.28;</p> <p>(2) Each high school may use any relevant title to identify a particular course;</p> <p>(3) Local school boards may propose innovative ways to meet or exceed the requirements in Table 306-1, pursuant to Ed 306.29;</p> <p>(4) Local school boards shall ensure that courses necessary to meet the requirements for attaining graduation competencies as defined on Table 306-3 are offered to district students enrolled in high school at no additional cost to the student;</p> <p>(5) The required courses in program areas offered by each high school shall be distributed as specified in Table 306-1 below:</p>	<p>(n) The following shall apply relative to the required program of studies:</p> <p>(1) Consistent with Ed 306, the school board shall verify in writing to the commissioner that each high school shall offer a total of at least 43 courses distributed as shown in Table 306-1 when the school seeks approval or renewal of approval under Ed 306.28;</p> <p>(2) Each high school may use any relevant title to identify a particular course;</p> <p>(3) School boards may propose innovative ways to meet or exceed the requirements in Table 306-1, pursuant to Ed 306.25;</p> <p>(4) School boards shall ensure that courses necessary to meet the requirements for attaining competencies as defined on Table 306-3 are offered to district students enrolled in high school at no additional cost to the student. <i>This shall not preclude offering courses through educational programming outside of the district resources, including but not limited to, Virtual Learning Academy charter school (VLACS) programs, Learn Everywhere programs, or any other alternative program;</i></p> <p>(5) The required courses in program areas offered by each high school shall be distributed as specified in Table 306-1 below:</p> <p>(6) Course requirements under Ed 306.27(l)(5) may be met through school identified and sanctioned distance education programs under Ed 306.22 subject to the following:</p>	<p>(6) Course requirements under Ed 306.27(l)(5) may be met through school identified and sanctioned distance education programs under Ed 306.22 subject to the following:</p>
	<p>The language added is unnecessary and should be removed. This has the potential of funding school choice through public tax dollars beyond EFAs.</p>	
	<p>Revised language</p>	<p>Revised language</p>

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<p>courses required by Ed 306.27(1)(5) to be offered at each host or sending high school in the region. Such courses shall be identified in the school's program of studies. Career program level courses, not available to all students, shall not be counted toward the high school requirement, including career level courses offered at a regional career and technical center that is co-located with the high school. Graduation competencies acquired and demonstrated through career courses may be counted toward a student's requirements for a high school diploma under Ed 306.27(1).</p>	<p>306.27(1)(5) to be offered at each host or sending high school in the region. Such courses shall be identified in the school's program of studies. Career program level courses, not available to all students, shall not be counted toward the high school requirement, including career level courses offered at a regional career and technical center that is co-located with the high school. Competencies acquired and demonstrated through career courses may be counted toward a student's requirements for a high school diploma under Ed 306.27(1).</p>	
<p>(8) Nothing in this section shall prevent a high school from offering classroom courses, distance education courses, independent study programs, career and technical center courses, or extended learning opportunities in addition to the courses required by Ed 306.27(1)(5). Schools shall not be required to pay for student registration or similar fees for these additional courses or programs; and</p>	<p>Revised language</p>	
<p>(9) Nothing in this section shall prevent a student from achieving and demonstrating any number of graduation competencies through classroom courses, career and technical center courses, distance education, independent study, or extended learning opportunities to meet the graduation requirements of Ed 306.27(1) consistent with local district policies.</p>	<p>Revised language</p>	
<p>(10) The local school board of each high school shall award a regular high school diploma to those students who achieve and demonstrate all graduation competencies as encompassed in at least 20 credits.</p>	<p>Revised language</p>	<p>(9) Nothing in this section shall prevent a student from achieving and demonstrating any number of competencies through classroom courses, career and technical center courses, distance education, independent study, or extended learning opportunities to meet the graduation requirements of Ed 306.27(1) consistent with local district policies.</p> <p>(10) The school board of each high school shall award a regular high school diploma to those students who achieve and demonstrate all competencies as encompassed in at least 20 credits, as demonstrated in Table 306-2.</p>

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<p>(p) The local school board shall require that a high school have in place competency assessments for all courses offered through the high school.</p>	<p><i>Removed</i></p>	<p>Recognize this was passed into law, but for a student with life plans to go directly into the workforce becomes ineligible for a diploma as a result.</p>
<p>(q) The local school board of each high school shall award a regular high school diploma to all students, with and without disabilities, who have achieved and demonstrated their local high school's required graduation competencies</p> <p>(r) The school board of a district which does not operate a high school may award a high school diploma if the following are met:</p> <p>(1) The district has contracted with a public academy, as defined in RSA 193:23, II, to be the high school for the district, as authorized by RSA 194:2; and</p> <p>(2) Students have attended a school other than the public academy.</p> <p>(s) The awarding of different types of diplomas shall be governed by the following:</p> <p>(1) A school shall award a regular diploma for achievement and demonstration of the graduation competencies;</p> <p>(2) A school may award a special diploma that recognizes academic achievement;</p> <p>(3) Graduation competencies achieved and demonstrated in adult education, including but not</p>	<p>(p) <i>Each student, as a prerequisite to receiving a high school diploma from a public school, shall fulfill the requirements of RSA 193:26-a, relative to the Free Application for Federal Student Aid. A model waiver shall be made available to school districts by the state board.</i></p> <p>(q) The school board of each high school shall award a regular high school diploma to all students, with and without disabilities, who have achieved and demonstrated their local high school's required competencies</p> <p>(r) The school board of a district which does not operate a high school may award a high school diploma if the following are met:</p> <p>(1) The district has contracted with a public academy, as defined in RSA 193:23, II, to be the high school for the district, as authorized by RSA 194:2; and</p> <p>(2) Students have attended a school other than the public academy.</p> <p>(s) The awarding of different types of diplomas shall be governed by the following:</p> <p>(1) A school shall award a regular diploma for achievement and demonstration of the competencies that lead toward graduation;</p> <p>(2) A school may award a special diploma that recognizes academic achievement;</p> <p>(3) Competencies achieved and demonstrated in adult education, including but not limited to night school, may be used to earn a regular diploma; and</p>	<p>New language/section per new statute</p> <p>Revised language</p> <p>No change</p> <p>Revised language</p>

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<p>limited to night school, may be used to earn a regular diploma; and</p> <p>(4) Students may earn certificates of completion or equivalency diplomas, but these shall not be equal to a regular high school diploma.</p> <p>(t) The district shall provide learning opportunities that enable students to achieve the district's graduation competencies. Graduation competencies shall align with the skills, knowledge, and work-study practices required for success in college and careers.</p>	<p>(4) Students may earn certificates of completion or equivalency diplomas, but these shall not be equal to a regular high school diploma.</p> <p>(t) <i>The 20 credits required for graduation shall be distributed as specified in Table 306-2. Attainment of 20 credits required for graduation, that are based on New Hampshire academic standards, shall ensure that students meet the following graduation competencies outlined in (u) below.</i></p> <p>(u) <i>Graduation competencies encompass a complete body of interrelated student accomplishment and should be considered as a whole, not as discrete silos. Graduation competencies shall align with appropriate high school academic content standards and require students to demonstrate their ability to apply and transfer their learning:</i></p> <p>(1) <i>In Arts, the ability to demonstrate competency in:</i></p> <p><i>a. Creating, presenting, and performing artistic works;</i></p> <p><i>b. Responding and connecting to artistic works;</i></p> <p>(2) <i>In Digital Literacy, the ability to use diverse technology tools and media to demonstrate competency in:</i></p> <p><i>a. Building new knowledge by inquiring, thinking critically, identifying and solving problems;</i></p> <p><i>b. Communicating clearly and creatively;</i></p>	<p>Replaced language</p>	
		<p>New Paragraphs</p>	

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	<p><i>c. Working effectively with others in ways that are safe, legal, and ethical;</i></p> <p><i>d. Locating and critically assessing digital content to construct knowledge, produce creative artifacts, and make meaningful learning experiences for themselves and others;</i></p> <p><i>(3) In English, the ability to demonstrate competency in:</i></p> <ul style="list-style-type: none"><i>a. listening and speaking thoughtfully and purposefully to understand others and convey meaning;</i><i>b. comprehending, analyzing, and critiquing a variety of literary and informational texts;</i><i>c. creating written explanations, narratives and logical arguments that effectively convey ideas, analyses and critiques encompassing broad topics suitable for a variety of audiences;</i><i>d. correctly using the conventions of standard English, such as grammar, punctuation, spelling, capitalization, and word usage, in all written work;</i> <p><i>(4) In Mathematics, the ability to demonstrate competency in:</i></p> <ul style="list-style-type: none"><i>a. understanding number systems and number sense, including computation concepts, strategies, procedures;</i>	
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	<p><i>b. understanding numerical and graphical representations of data and the underlying logical and relational statements represented by those data;</i></p> <p><i>c. understanding geometric relationships and representations and underlying mathematical principles;</i></p> <p><i>d. reasoning mathematically in the development of argument and logic;</i></p> <p><i>(5) In Science, the ability to demonstrate competency in:</i></p> <p><i>a. understanding foundational principles of physical and life sciences;</i></p> <p><i>b. designing and carrying out investigations to explore biological, chemical, and physical phenomena;</i></p> <p><i>c. analyzing and interpreting data to engage in argument from evidence;</i></p> <p><i>d. recognizing, interpreting, modeling, and explaining evidence, such as pattern, scale, proportion and quantity, cause and effect, and other cross-cutting concepts related to observable and non-observable phenomena;</i></p> <p><i>(6) In social studies (US and NH History, Government and Civics, Economics and World History), the ability to demonstrate competency in:</i></p>		
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	<p><i>a. understanding the history of the United States through multiple perspectives, including founding principles and the on-going struggle to realize those principles;</i></p> <p><i>b. understand the governance and functioning of local, state and federal government in a constitutional republic through multiple perspectives;</i></p> <p><i>c. understanding processes of civic engagement in a democratic society, including tolerance and well-mannered engagement across differences of perspective, philosophy, cultural, race and heritage;</i></p> <p><i>d. understanding important events marking world history and how those events have shaped cultural, political and other aspects of civilization through multiple perspectives;</i></p> <p><i>e. recognizing local, state, national and global geography and understand how geography has influenced humanity through multiple perspectives;</i></p> <p><i>f. understanding economic systems and their effect on society;</i></p> <p><i>g. effective planning and management of personal financial resources;</i></p> <p><i>h. researching, inquiring, analyzing, and explaining historical, civic, government, geographic and economic developments.</i></p>		
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	<p><i>including interaction and interdependence, through multiple perspectives;</i></p> <p><i>(7) In Health and Physical Education, the ability to demonstrate competency in:</i></p> <ul style="list-style-type: none"><i>a. researching and comprehending concepts related to health promotion and disease prevention;</i><i>b. setting goals, advocating for and pursuing positive health outcomes for self and others;</i> <p><i>(8) In open electives, an opportunity to demonstrate competency in:</i></p> <ul style="list-style-type: none"><i>a. pursuing areas of personal interest that instill a passion for lifelong learning;</i><i>b. making connections between education and career paths;</i> <p><i>(9) In all programs and courses, the ability to demonstrate competency in:</i></p> <ul style="list-style-type: none"><i>a. Communicating effectively using multiple modalities, interpreting information using multiple senses, and demonstrating ownership of the work;</i><i>b. Thinking originally and independently, taking risks, considering alternate perspectives, and incorporating diverse resources;</i><i>c. Contributing respectfully, listening and sharing resources and ideas, accepting and fulfilling roles,</i>	


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	<p>and exercising flexibility and a willingness to compromise in both an academic and a career settings;</p> <p>d. <i>Persevering in completing complex, challenging tasks, using self-reflection to influence work and goals, and engaging stakeholders to gain support;</i></p>		
	<p>(v) <i>School districts shall develop course competencies, based on New Hampshire academic standards, where applicable, for all course offerings. School districts may use state model course competencies to develop minimum course competencies.</i></p>	New paragraph	
<p>(u) Students shall demonstrate competencies contained in at least the equivalent of 20 credits. Students shall engage in learning concerning competencies in the areas of English/language arts and mathematics for every year they are in high school until graduation, regardless if English/language arts or mathematics graduation competencies have been achieved. Such engagement may occur through integration of these graduation competencies in courses focused on content areas other than English or mathematics as long as English or mathematics competencies are clear expectations of the course. Such engagement shall support students to be college and career ready in mathematics and English/language arts. Nothing contained in this section shall preclude a school or district from offering courses and other learning opportunities in addition to the minimum outlined in Ed. 306.</p>		Removed	
<p>(w) Graduation competencies shall include competencies from the content areas as distributed in Table 306-3 in which students demonstrate</p>		Removed	

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<p>proficiency as determined by the local school district:</p> <p>(x) The rigor and number of graduation competencies shall align with the equivalent of the credits as outlined in Table 306-3.</p> <p>(y) In addition to the graduation competencies aligned with credits as outlined in Table 306-3, students shall also demonstrate achievement of additional competencies through the equivalent of 6 elective courses, career and technical education courses, or extended learning opportunities of their choosing. These additional competencies required for graduation should align with student interests and should prepare the student for successful transitions into careers and college.</p> <p>(z) The graduation competencies in digital literacy education shall be met by either:</p> <p>(1) The equivalent of a 1/2 credit course comprised of the creation by a student of an individual student digital portfolio to demonstrate proficient, ethical, and responsible use of digital tools, including, but not limited to, technology and communication tools, in the context of core subjects; or</p> <p>(2) A course in digital literacy education at the high school level through which a student can achieve and demonstrate</p> <p>(aa) The local school board shall adopt a policy relative to counting achievement and demonstration of graduation competencies from course work earned in one content area toward meeting any graduation competencies in another content area.</p> <p>(ab) Any graduation competency in a subject area may be earned through interdisciplinary learning, subject to the following conditions:</p>	<p>(w) The rigor and number of competencies shall align with the equivalent of the credits as outlined in Table 306-3.</p>	<p>Revised</p> <p>Renumbered</p> <p>Removed</p>	
<p>(1) The equivalent of a 1/2 credit course comprised of the creation by a student of an individual student digital portfolio to demonstrate proficient, ethical, and responsible use of digital tools, including, but not limited to, technology and communication tools, in the context of core subjects; or</p> <p>(2) A course in digital literacy education at the high school level through which a student can achieve and demonstrate</p>		<p>Removed</p>	
<p>(aa) The local school board shall adopt a policy relative to counting achievement and demonstration of graduation competencies from course work earned in one content area toward meeting any graduation competencies in another content area.</p> <p>(ab) Any graduation competency in a subject area may be earned through interdisciplinary learning, subject to the following conditions:</p>	<p>(x) Any competency in a subject area may be earned through interdisciplinary learning:</p>	<p>Revised language</p> <p>Removed paragraphs (1) – (2)</p>	

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<p>(1) Graduation requirements met by interdisciplinary learning opportunities shall be clearly designated on student transcripts; and</p> <p>(2) The high school principal may approve a particular interdisciplinary course if the high school principal determines that:</p> <p>a. The course has been adopted by a faculty team; and</p> <p>b. The course addresses equivalent district or graduation competencies for the subject areas which are covered by the course.</p> <p>(ac) Local school board policies relative to the awarding of achievement and demonstration of district or graduation competencies for distance education as described in Ed 306.22, shall require that:</p> <p>(1) Students may earn achievement and demonstration of the graduation competencies through the successful completion of such courses; and</p> <p>(2) Achievement and demonstration of district or graduation competencies shall be granted only if the high school principal determines that the distance learning course meets the academic standards required by the high school for students to demonstrate achievement of district or graduation competencies.</p>			
<p>(ad) In each high school, the minimum yearly course load for a student shall be the equivalent of 4 credits, except that this requirement may be modified for:</p>		<p>Removed</p>	
	<p>(v) In each high school, the minimum yearly course load for a student shall be the equivalent of 4 credits, except that this requirement may be modified for:</p>	<p>Renumbered</p>	

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<p>(1) Students with an individualized education program (IEP) that has been developed in accordance with Ed 1109;</p> <p>(2) Students for whom early graduation has been approved as provided in (ad) below; or</p> <p>(3) Those individuals in special or unusual circumstances as provided by local school board policy.</p>	<p>(1) Students with an individualized education program (IEP) that has been developed in accordance with Ed 1109;</p> <p>(2) Students for whom early graduation has been approved as provided in (ad) below; or</p> <p>(3) Those individuals in special or unusual circumstances as provided by school board policy.</p>	
<p>(ae) A local school board shall adopt policies pertaining to early graduation for individual students. Such policies shall require parental involvement for students under the age of 18. Consistent with local policy, the high school principal shall approve such requests if the high school principal determines that all state and local graduation requirements will be met and that early graduation is related to the career or educational plans of the student making the request. Upon demonstration of all graduation competencies, awarding of appropriate credits, and approval by the high school principal, the student shall be awarded a high school diploma.</p>	<p>Removed</p>	
<p>(af) The principal shall evaluate the transcripts of students who transfer into a secondary school from another educational program, or state, to determine previous educational experiences toward meeting graduation competencies.</p> <p>(ag) Upon receipt of a written request from the local school board, the commissioner of education shall waive a particular graduation requirement and shall permit the local board to award a high school diploma to a student if the commissioner determines that:</p>	<p>(z) The principal shall evaluate the transcripts of students who transfer into a secondary school from another educational program, or state, to determine previous educational experiences toward meeting competencies.</p>	<p>Revised</p> <p>Renumbered</p> <p>Removed</p>

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<p>(1) Such action is in the best interests of the student; and</p> <p>(2) At least one of the following circumstances exists:</p> <p>a. The student has a debilitating illness which limits school attendance;</p> <p>b. The student has a physical disability which precludes participation in physical education;</p> <p>c. The student moved into a New Hampshire school district from out of state during grade 12 and was not able to schedule a particular graduation requirement; or</p> <p>d. Another condition exists beyond the control of the student similar to the conditions described in a., b., or c. above</p>	
<p>(a) Each local high school shall provide reasonable accommodations for cocurricular activities as appropriate in order to allow for full access and participation by students with disabilities.</p> <p>(a1) The local school board shall require, and each district shall establish, and provide instruction in, Holocaust and genocide education as described in Ed 306.49, and continuing through grade 12 as a component of a course in social studies, world history, global studies, or US history. Nothing in this paragraph shall be construed to prevent developmentally appropriate instruction in Holocaust and genocide studies prior to 8th grade or as a component of other learning areas.</p>	<p>Renumbered</p> <p>(ab) The school board shall require, and each district shall establish, and provide instruction in, Holocaust and genocide education as described in Ed 306.49, implemented not earlier than in 8th grade and continuing through grade 12 as a component of a course in social studies, world history, global studies, or US history. Nothing in this paragraph shall be construed to prevent developmentally appropriate instruction in Holocaust and genocide studies prior to 8th grade or as a component of other learning areas.</p>

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<p>Ed 306.28 <u>Approval Process.</u></p> <p>(a) Pursuant to RSA 186:8, 1, and RSA 21-N:6, V, the department shall administer Ed 306.</p> <p>(b) The following school approval categories shall apply to the administration of Ed 306:</p> <p>(1) Approved for a 5 year period provided that a school meets and continues to meet all requirements of Ed 306;</p> <p>(2) Conditionally approved; and</p> <p>(3) Unapproved.</p> <p>(c) A school which does not meet all of the applicable requirements of Ed 306 shall be designated as conditionally approved, provided that:</p> <p>(1) All identified deficiencies and a timetable for their correction shall be incorporated into the approval designation; and</p> <p>(2) The department shall work with the school officials and the local school board toward correcting all deficiencies.</p> <p>(d) A conditionally approved school which fails to meet the requirements of an approved school within 3 consecutive school years shall be designated as unapproved unless approved for delay in full compliance under Ed 306.30.</p> <p>(e) One year prior to the expiration of a school's approval, the chairperson of the local school board and the superintendent of the respective district shall provide documentation of compliance with all applicable standards as follows:</p>	<p>Ed 306.28 <u>Approval Process.</u></p> <p>(a) Pursuant to RSA 186:8, 1, and RSA 21-N:6, V, the department shall administer Ed 306.</p> <p>(b) The following school approval categories shall apply to the administration of Ed 306:</p> <p>(1) Approved for a 5 year period provided that a school meets and continues to meet all requirements of Ed 306;</p> <p>(2) Conditionally approved; and</p> <p>(3) Unapproved.</p> <p>(c) A school which does not meet all of the applicable requirements of Ed 306 shall be designated as conditionally approved, provided that:</p> <p>(1) All identified deficiencies and a timetable for their correction shall be incorporated into the approval designation; and</p> <p>(2) The department shall work with the school officials and the school board toward correcting all deficiencies.</p> <p>(d) A conditionally approved school which fails to meet the requirements of an approved school within 3 consecutive school years shall be designated as unapproved unless approved for delay in full compliance under Ed 306.30.</p> <p>(e) One year prior to the expiration of a school's approval, the chairperson of the school board and the superintendent of the respective district shall provide documentation of compliance with all applicable standards as follows:</p>	<p>Removed the word local to conform with definition</p>
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<p>(1) By October 1, the superintendent of schools shall electronically certify that the schools in the school administrative unit meet all requirements of Ed 306 through the online Education Statistics System (ESS) school approval checklist; and at https://my.doc.nh.gov/myNHDOE/Login/Login.aspx</p> <p>(2) All schools shall annually comply with Ed 306.07, School Facilities, through the online ESS in (1) above and Saf-C 6000, State Fire Code, through completion of a life safety inspection by the local fire department and inspection by the local health officer or other authority having jurisdiction as required by RSA 153:14.</p> <p>(f) A school not meeting the requirements of (f)(2) above shall be designated as unapproved.</p> <p>(g) If compliance with any other requirement of Ed 306 is in question, the school board chairperson and superintendent shall provide the commissioner with an alternative approval proposal as provided in Ed 306.29. If approved, the alternative approval proposal shall be made publicly available by the school district.</p> <p>(h) The commissioner of education shall designate qualified professionals to visit schools to conduct school audits to verify the information and documentation submitted in (a) and (f) above, in conjunction with visits pursuant to RSA 193-E:3.</p> <p>(i) Each year the commissioner shall provide a proposed approval designation, as identified in (b) above, for each public school and public academy with an expiring approval status.</p>	<p>(4f) By October 1, the superintendent of schools shall electronically certify that the schools in the school administrative unit meet all requirements of Ed 306 through the online Education Statistics System (ESS) school approval checklist; and at https://my.doc.nh.gov/myNHDOE/Login/Login.aspx</p> <p>(2) All schools shall annually comply with Ed 306.07, School Facilities, through the online ESS in (1) above and Saf-C 6000, State Fire Code, through completion of a life safety inspection by the local fire department and inspection by the local health officer or other authority having jurisdiction as required by RSA 153:14.</p> <p>(g) Per Ed 306.07, all facilities operated by the school district for K-12 educational purposes are approved to operate or conditionally approved to operate in accordance with Ed 320.</p> <p>(h) A school not meeting the requirements of (g)(2) above shall be designated as unapproved.</p> <p>(i) If compliance with any other requirement of Ed 306 is in question, the school board chairperson and superintendent shall provide the commissioner with an alternative approval proposal as provided in Ed 306.29. If approved, the alternative approval proposal shall be made publicly available by the school district.</p> <p>(j) The commissioner of education shall designate qualified professionals to visit schools to conduct school audits to verify the information and documentation submitted in (e) and (f) above, in conjunction with visits pursuant to RSA 193-E:3.</p>	<p>Revised language citing back to Ed 320 for facilities regulations for school approvals, renumbered section</p>
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<p>(j) The commissioner shall notify in writing the chairperson of the local school board and the superintendent of each school's final approval designation.</p> <p>(k) If local school officials consider the commissioner's proposed approval designation to be in error, the superintendent shall prepare written evidence to justify its modification.</p> <p>(l) Such evidence shall be submitted to the commissioner or designee within 30 days of receipt of the commissioner's proposed designation.</p> <p>(m) The commissioner shall review all requests for modification and notify, in writing, the chairperson of the local school board and the superintendent of his/her final approval designation as identified in (b).</p> <p>(n) If a request for modification of a proposed approval designation has not been received within 30 days, it shall become the commissioner's final approval designation and the school shall be designated as approved, conditionally approved, or unapproved as identified in (b).</p> <p>(o) Each year, the state board of education shall direct the commissioner of education to publish a list of all public schools and public academies by approval category. The term of approval for each school shall also be listed.</p> <p>(p) If the commissioner has designated a school as unapproved, the chairperson of the local school board or designee may appeal the decision of the school's final approval designation and request a</p>	<p>(k) Each year the commissioner shall provide a proposed approval designation, as identified in (b) above, for each public school and public academy with an expiring approval status.</p> <p>(l) The commissioner shall notify in writing the chairperson of the school board and the superintendent of each school's final approval designation.</p> <p>(m) If local school officials consider the commissioner's proposed approval designation to be in error, the superintendent shall prepare written evidence to justify its modification.</p> <p>(n) Such evidence shall be submitted to the commissioner or designee within 30 days of receipt of the commissioner's proposed designation.</p> <p>(o) The commissioner shall review all requests for modification and notify, in writing, the chairperson of the school board and the superintendent of his/her final approval designation as identified in (b).</p> <p>(p) If a request for modification of a proposed approval designation has not been received within 30 days, it shall become the commissioner's final approval designation and the school shall be designated as approved, conditionally approved, or unapproved as identified in (b).</p> <p>(q) Each year, the state board of education shall direct the commissioner of education to publish a list of all public schools and public academies by approval category. The term of approval for each school shall also be listed.</p>	
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<p>state board hearing. Said appeal shall be filed in writing with the office of legislation and hearings within 20 days of the receipt of the final approval designation and shall specify the basis for the appeal. The office of legislation and hearings shall schedule a hearing on the appeal in accordance with timelines and procedures established in Ed 306.</p> <p>(q) It shall be the responsibility of the superintendent to notify the commissioner of any change in conditions which affects a school's compliance with these rules.</p> <p>(r) Pursuant to RSA 21-N:11, III, any person directly affected by said decision may request a state board hearing. A request for a hearing shall be filed in writing with the office of legislation and hearings within 20 days of the decision and shall specify the basis for such hearing. The office of legislation and hearings shall schedule the hearing in accordance with timelines and procedures established in Ed 200</p>	<p>(r) If the commissioner has designated a school as unapproved, the chairperson of the school board or designee may appeal the decision of the school's final approval designation and request a state board hearing. Said appeal shall be filed in writing with the office of legislation and hearings within 20 days of the receipt of the final approval designation and shall specify the basis for the appeal. The office of legislation and hearings shall schedule a hearing on the appeal in accordance with timelines and procedures established in Ed 200.</p> <p>(s) It shall be the responsibility of the superintendent to notify the commissioner of any change in conditions which affects a school's compliance with these rules.</p> <p>(t) Pursuant to RSA 21-N:11, III, any person directly affected by said decision may request a state board hearing. A request for a hearing shall be filed in writing with the office of legislation and hearings within 20 days of the decision and shall specify the basis for such hearing. The office of legislation and hearings shall schedule the hearing in accordance with timelines and procedures established in Ed 200.</p>	
<p><u>Ed 306.29 Alternative Approval</u></p> <p>(a) In order to meet the provisions of these rules and encourage innovation to achieve high standards for students, a local school board may request approval of an alternative method of compliance with the relevant rule or rules.</p> <p>(b) To apply for alternative approval, the local school board shall submit a written request to the commissioner of education that includes:</p>	<p><u>Ed 306.29 Alternative Approval</u></p> <p>(a) In order to meet the provisions of these rules and encourage innovation to achieve high standards for students, a local school board may request approval of an alternative method of compliance with the relevant rule or rules.</p> <p>(b) To apply for alternative approval, the school board shall submit a written request to the commissioner of education that includes:</p>	<p>Removed "local" to conform to definition</p>

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<p>(1) The name(s) of school(s)/district; (2) The SAU number; (3) The contact person and telephone number; (4) The grades covered by the request; (5) The number of students affected; (6) Identification of the rule(s) for which the alternative plan is being submitted; (7) The local school board chairperson's signature; (8) A clear and concise written justification of the request; and (9) A plan which describes the alternative and consists of a statement of intent, method of implementation, evaluation procedures, timetable for development and implementation, and an explanation of how the alternative is consistent with the statement(s) of philosophy, goals, and objectives adopted pursuant to Ed 306.05.</p> <p>(c) The commissioner shall grant approval of the alternative for that period of time consistent with the school(s) approval designation, issued pursuant to Ed 306.26, if the request meets the following criteria:</p> <p>(1) The information provided is thorough and complete;</p>	<p>(1) The name(s) of school(s)/district; (2) The SAU number; (3) The contact person and telephone number; (4) The grades covered by the request; (5) The number of students affected; (6) Identification of the rule(s) for which the alternative plan is being submitted; (7) The school board chairperson's signature; (8) A clear and concise written justification of the request; and (9) A plan which describes the alternative and consists of a statement of intent, method of implementation, evaluation procedures, timetable for development and implementation, and an explanation of how the alternative is consistent with the statement(s) of philosophy, goals, and objectives adopted pursuant to Ed 306.05.</p> <p>(c) The commissioner shall grant approval of the alternative for that period of time consistent with the school(s) approval designation, issued pursuant to Ed 306.26, if the request meets the following criteria:</p> <p>(1) The information provided is thorough and complete;</p>	
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<p>(2) The school district has demonstrated that it is able to implement the alternative; and</p> <p>(3) The alternative is educationally sound and is consistent with the intent of the rule(s).</p> <p>(d) The commissioner shall notify the local school board chairperson and the superintendent in writing of the decision.</p> <p>(e) If the commissioner denies the request, the chairperson of the local school board or designee may appeal the decision and request a state board hearing. The appeal shall be filed in writing with the office of legislation and hearings within 20 days of the receipt of the decision and shall specify the basis for the appeal. The office of legislation and hearings shall schedule a hearing on the appeal in accordance with timelines and procedures established in Ed 200.</p> <p>(f) Pursuant to RSA 21-N:11, III, any person directly affected by said decision may request a state board hearing. A request for a hearing shall be filed in writing with the office of legislation and hearings within 20 days of the decision and shall specify the basis for such hearing. The office of legislation and hearings shall schedule the hearing in accordance with timelines and procedures established in Ed 200.</p> <p>Ed 306.30 <u>Delay in Full Compliance</u></p>	<p>(2) The school district has demonstrated that it is able to implement the alternative; and</p> <p>(3) The alternative is educationally sound and is consistent with the intent of the rule(s).</p> <p>(d) The commissioner shall notify the school board chairperson and the superintendent in writing of the decision.</p> <p>(e) If the commissioner denies the request, the chairperson of the school board or designee may appeal the decision and request a state board hearing. The appeal shall be filed in writing with the office of legislation and hearings within 20 days of the receipt of the decision and shall specify the basis for the appeal. The office of legislation and hearings shall schedule a hearing on the appeal in accordance with timelines and procedures established in Ed 200.</p> <p>(f) Pursuant to RSA 21-N:11, III, any person directly affected by said decision may request a state board hearing. A request for a hearing shall be filed in writing with the office of legislation and hearings within 20 days of the decision and shall specify the basis for such hearing. The office of legislation and hearings shall schedule the hearing in accordance with timelines and procedures established in Ed 200.</p> <p>Ed 306.30 <u>Delay in Full Compliance</u></p>	<p>Removed "local"</p>
<p>(a) Notwithstanding any other provision of these rules and in accordance with the provisions of RSA 194:23-b, the state board of education shall approve, for a period of one year, a school, although it does not fully meet the requirements for an approved</p>	<p>(a) Notwithstanding any other provision of these rules and in accordance with the provisions of RSA 194:23-b, the state board of education shall approve, for a period of one year, a school, although it does not fully meet the requirements for an approved</p>	

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<p>school, as established in these rules, if any of the conditions listed in (c)(1)-(5) below justify delay in full compliance.</p> <p>(b) A request for delay in full compliance shall be submitted in writing by the chairperson of the local school board to the commissioner. Each request shall specify the standard(s) to be delayed and provide written evidence to justify delay in full compliance, including the reason(s) for the request and a local plan and timetable for bringing the school/district into full compliance.</p> <p>(c) Upon review of the request, the state board shall grant a delay in full compliance and approve the school for a period of one year if any of the following conditions exist at a level that has a significant and/or material impact:</p> <ol style="list-style-type: none"> (1) Reduction in local tax base; (2) Closing of a major industry; (3) Sudden influx of school-age population; (4) Emergency beyond the control of the school district, such as a fire or natural disaster; or (5) The district has made progress toward meeting the standards, but more time is required to implement the district's plan for corrective action. <p>(d) The commissioner shall notify the local school board chairperson and the superintendent of the state board's decision.</p> <p>(e) If the state board denies the request, the chairperson of the local school board or designee may request a reconsideration of the state board's</p>	<p>school, as established in these rules, if any of the conditions listed in (c)(1)-(5) below justify delay in full compliance.</p> <p>(b) A request for delay in full compliance shall be submitted in writing by the chairperson of the local school board to the commissioner. Each request shall specify the standard(s) to be delayed and provide written evidence to justify delay in full compliance, including the reason(s) for the request and a local plan and timetable for bringing the school/district into full compliance.</p> <p>(c) Upon review of the request, the state board shall grant a delay in full compliance and approve the school for a period of one year if any of the following conditions exist at a level that has a significant and/or material impact:</p> <ol style="list-style-type: none"> (1) Reduction in local tax base; (2) Closing of a major industry; (3) Sudden influx of school-age population; (4) Emergency beyond the control of the school district, such as a fire or natural disaster; or (5) The district has made progress toward meeting the standards, but more time is required to implement the district's plan for corrective action. <p>(d) The commissioner shall notify the local school board chairperson and the superintendent of the state board's decision.</p> <p>(e) If the state board denies the request, the chairperson of the school board or designee may request a reconsideration of the state board's</p>
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<p>decision. The reconsideration shall be filed in writing with the office of legislation and hearings within 20 days of receipt of the decision. The office of legislation and hearings shall schedule reconsideration in accordance with timelines and procedures established in Ed 213.</p> <p>(a) Pursuant to Ed 306.26 and Ed 306.27, the local school board shall require that an arts education program for grades 1-12 provides:</p> <p>(1) Systematic and sequential instruction in the arts disciplines of music and visual art, while developing opportunities for dance and theatre, where students will:</p> <ul style="list-style-type: none"> a. Create, perform, and respond with understanding; b. Participate actively in at least one of the art forms of dance, music, theatre or visual art; c. Analyze and evaluate works of art from structural, historical, and cultural perspectives, including acquiring the ability to understand and evaluate works of art in various arts disciplines; d. Recognize exemplary works of art from a variety of historical periods and cultures, as well as understand historical development within and among the arts disciplines; e. Relate various types of arts knowledge and skills within and across the arts and other disciplines; f. Use technology as ways to create, perform, or respond in various arts disciplines; and g. Become familiar with career opportunities in the arts or with the impact of the arts on everyday life. 	<p>decision. The reconsideration shall be filed in writing with the office of legislation and hearings within 20 days of receipt of the decision. The office of legislation and hearings shall schedule reconsideration in accordance with timelines and procedures established in Ed 213.</p> <p>(a) <i>The school board shall provide an arts education program in each elementary, middle and high school consistent with course competencies determined pursuant to Ed 306.26 and Ed 306.27, which may include:</i></p> <p>(1) Systematic and sequential instruction in the arts disciplines of music and visual art, while developing opportunities for dance and theatre, where students will:</p> <ul style="list-style-type: none"> a. Create, perform, and respond with understanding; b. Participate actively in at least one of the art forms of dance, music, theatre or visual art; c. Analyze and evaluate works of art from structural, historical, and cultural perspectives, including acquiring the ability to understand and evaluate works of art in various arts disciplines; d. Recognize exemplary works of art from a variety of historical periods and cultures, as well as understand historical development within and among the arts disciplines; e. Relate various types of arts knowledge and skills within and across the arts and other disciplines; f. Use technology as ways to create, perform, or respond in various arts disciplines; and 	<p>Revised Language</p> <p>Missing Header: Ed306.31 Arts Education Program</p>
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<p>(2) Planned curriculum that is consistent with RSA 193-C:3, III; that will provide for:</p> <ul style="list-style-type: none"> a. A variety of developmentally appropriate techniques and processes as well as learning materials such as tools, equipment, facilities and supplies, including but not limited to musical instruments, current recording devices, computers and software, and expendable art-making supplies, that meet the diverse needs, interests and capacities of each student; b. The best interests of students regarding safety and health issues associated with materials, tools, equipment, supplies and procedures; c. The ability to guide student development in observing, imagining, visualizing, listening, transforming, and synthesizing their thoughts and ideas into artworks through traditional and nontraditional means such as, but not limited to, choreography, reading and writing music, improvisation, script-writing, set design, two and three-dimensional artworks, and media arts; d. The ability to guide students in selecting and applying subject matter and movements, sounds, language, or symbols, or any combination of them, with ideas to express meaning in artwork; e. Developing artistry and artistic skill sequentially over time; f. Critical thinking skills and artistic choices in the creation and evaluation of artworks; g. Addressing opportunities available beyond the regular classroom; and 	<ul style="list-style-type: none"> g. Become familiar with career opportunities in the arts or with the impact of the arts on everyday life; <p>(2) Planned curriculum that is consistent with RSA 193-C:3, III; that will provide for:</p> <ul style="list-style-type: none"> a. A variety of developmentally appropriate materials such as tools, equipment, facilities and supplies, including but not limited to musical instruments, current recording devices, computers and software, and expendable art-making supplies, that meet the diverse needs, interests and capacities of each student; b. The best interests of students regarding safety and health issues associated with materials, tools, equipment, supplies and procedures; c. The ability to guide student development in observing, imagining, visualizing, listening, transforming, and synthesizing their thoughts and ideas into artworks through traditional and nontraditional means such as, but not limited to, choreography, reading and writing music, improvisation, script-writing, set design, two and three-dimensional artworks, and media arts; d. The ability to guide students in selecting and applying subject matter and movements, sounds, language, or symbols, or any combination of them, with ideas to express meaning in artwork; e. Developing artistry and artistic skill sequentially over time; f. Critical thinking skills and artistic choices in the creation and evaluation of artworks; 	
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<p>h. Embedding in the students global arts-related history and culture; and</p> <p>(3) Sound assessment practices as stated in Ed 306.24.</p>	<p>g. Addressing opportunities available beyond the regular classroom; and</p> <p>h. Embedding in the students global arts-related history and culture; and</p> <p>(3) Sound assessment practices <i>consistent with</i> Ed 306.24.</p>	
<p>Ed 306.33 <u>Business Education Program.</u></p> <p>(a) Pursuant to Ed 306.27, the local school board shall require that a business education program provides:</p> <p>(1) Opportunities for students to become familiar with business principles, practices, attitudes and procedures basic to successful participation in the business world;</p> <p>(2) Planned activities designed to increase students' knowledge and skills and enable students to function as economically literate citizens in domestic and international venues;</p> <p>(3) Opportunities for students to acquire fundamental business knowledge and skills in:</p> <p>a. Business essentials;</p> <p>b. Business technology applications; and</p> <p>c. Personal finance; and</p> <p>(4) Courses totaling at least 3 credits in business education which shall be distributed as follows:</p> <p>a. One credit in business essentials that will encompass career exploration in:</p>	<p>Ed 306.33 <u>Business Education Program.</u></p> <p>(a) <i>The school board shall provide a business education program at each high school consistent with course competencies determined pursuant to Ed 306.27, which may include:</i></p> <p>(1) Opportunities for students to become familiar with business principles, practices, attitudes and procedures basic to successful participation in the business world;</p> <p>(2) Planned activities designed to increase students' knowledge and skills and enable students to function as economically literate citizens in domestic and international venues;</p> <p>(3) Opportunities for students to acquire fundamental business knowledge and skills in:</p> <p>a. Business essentials;</p> <p>b. Business technology applications; and</p> <p>c. Personal finance; and</p> <p>(4) Courses totaling at least 3 credits in business education which shall be distributed as follows:</p> <p>a. One credit in business essentials that will encompass career exploration in:</p>	<p>Revised language</p>

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<p>1. Overview of career clusters in business, marketing, and finance;</p> <p>2. Written and oral communication;</p> <p>3. Mathematics and economics;</p> <p>4. Legal and ethical behavior;</p> <p>5. Safe and secure environmental controls;</p> <p>6. Management of resources;</p> <p>7. Employability and personal skills for success in the workplace;</p> <p>8. Entrepreneurship;</p> <p>9. Business practices including ethics and social responsibilities; and</p> <p>10. Global economy;</p> <p>b. One credit in business technology applications that shall encompass business technologies in:</p> <p>1. Word processing applications;</p> <p>2. Spreadsheet development;</p> <p>3. Database management;</p> <p>4. Presentations;</p> <p>5. Electronic communications and internet services;</p> <p>6. Graphics;</p> <p>7. Desktop publishing including basic web design;</p> <p>8. Interactive media;</p>	<p>1. Overview of career clusters in business, marketing, and finance;</p> <p>2. Written and oral communication;</p> <p>3. Mathematics and economics;</p> <p>4. Legal and ethical behavior;</p> <p>5. Safe and secure environmental controls;</p> <p>6. Management of resources;</p> <p>7. Employability and personal skills for success in the workplace;</p> <p>8. Entrepreneurship;</p> <p>9. Business practices including ethics and social responsibilities; and</p> <p>10. Global economy;</p> <p>b. One credit in business technology applications that shall encompass business technologies in:</p> <p>1. Word processing applications;</p> <p>2. Spreadsheet development;</p> <p>3. Database management;</p> <p>4. Presentations;</p> <p>5. Electronic communications and internet services;</p> <p>6. Graphics;</p> <p>7. Desktop publishing including basic web design;</p> <p>8. Interactive media;</p>	
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<p>9. Ethical issues; and</p> <p>10. Careers in business using technology applications; and</p> <p>c. One credit in personal finance that will encompass financial literacy in:</p> <ol style="list-style-type: none"> 1. Personal financial decisions; 2. Rights and responsibilities of consumers; 3. Money management; 4. Understanding scholarships versus loans; 5. Borrowing and earning power; 6. Investing; 7. Financial services and insurance; and 8. Job application and interviewing. <p>(b) Each district shall establish and provide a comprehensive, sequentially designed, business education curriculum designed to meet the minimum standards for college and career readiness and that provides for continued growth in all content areas consistent with RSA 193-C:3, III.</p> <p>(c) For business education programs, schools shall provide for the ongoing, authentic assessment of student learning outcomes through multiple formative and summative assessment instruments that are aligned with the state and district content and performance standards.</p> <p>(d) Examples of such assessment shall include, but not be limited to:</p>	<p>9. Ethical issues; and</p> <p>10. Careers in business using technology applications; and</p> <p>c. One credit in personal finance that will encompass financial literacy in:</p> <ol style="list-style-type: none"> 1. Personal financial decisions; 2. Rights and responsibilities of consumers; 3. Money management; 4. Understanding scholarships versus loans; 5. Borrowing and earning power; 6. Investing; 7. Financial services and insurance; and 8. Job application and interviewing. <p>(b) Each district shall establish and provide a comprehensive, sequentially designed, business education curriculum designed to meet the minimum standards for college and career readiness and that provides for continued growth in all content areas consistent with RSA 193-C:3, III.</p> <p>(c) For business education programs, schools shall provide for the ongoing, authentic assessment of student learning outcomes through multiple formative and summative assessment instruments that are aligned with the state and district content and performance standards.</p> <p>(d) <i>Sound assessment practices consistent with Ed 306.24;</i></p>	
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<p>(1) Teacher observations of student performance;</p> <p>(2) Competency-based or performance based assessments;</p> <p>(3) Common assessments developed locally; and</p> <p>(4) Project evaluation rubrics used to evaluate business education proficiencies applied to integrated curriculum assignments, extended learning opportunities, and out of school learning environments.</p>	<p>(c) For all business education programs, schools shall demonstrate how school and student assessment data are used to evaluate, develop, and improve curriculum, instruction, and assessment.</p>	
<p>(e) For all business education programs, schools shall demonstrate how school and student assessment data are used to evaluate, develop, and improve curriculum, instruction, and assessment.</p> <p><u>Ed 306.34 Career and Technical Education Program</u></p> <p>(a) Pursuant to Ed 306.27, all high school career and technical education (CTE) programs shall be a partnership between the high school and the regional CTE center, established under RSA 188-E.</p> <p>(b) An approved CTE program shall be one that:</p> <p>(1) Delivers multi-level career and technical education, as defined in Ed 306.02(b), in sequential fashion, based on program-specific competencies endorsed by CTE and business leaders;</p> <p>(2) Utilizes competencies aligned with national industry standards that have been vetted through both business and industry and postsecondary education;</p>	<p><u>Ed 306.34 Career and Technical Education Program</u></p> <p>(a) Pursuant to Ed 306.27, all high school career and technical education (CTE) programs shall be a partnership between the high school and the regional CTE center, established under RSA 188-E.</p> <p>(b) An approved CTE program shall be one that:</p> <p>(1) Delivers multi-level career and technical education, as defined in Ed 306.02(b), in sequential fashion, based on program-specific competencies endorsed by CTE and business leaders;</p> <p>(2) Utilizes competencies aligned with national industry standards that have been vetted through both business and industry and postsecondary education;</p>	<p>Removed paragraph (f)</p>

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<p>(3) Offer students a career pathway plan of study that establishes an educational progression from secondary through postsecondary, which culminates in a postsecondary educational degree or credential in the student's chosen career field or to a career in the student's identified field in a supportive capacity for students with disabilities whose IEP teams have determined that the student, even with accommodations and or modifications, is unable to meet licensure or certification requirements;</p> <p>(4) Implements third-party assessments as recognized and designated by the department;</p> <p>(5) Is in one of the following nationally recognized career cluster areas:</p> <ul style="list-style-type: none"> a. Agriculture, food, and natural resources; b. Architecture and construction; c. Arts, audiovisual and communications; d. Business, management, and administration; e. Education and training; f. Finance, including personal financial literacy; g. Government and public administration; h. Health science; i. Hospitality and tourism; j. Human services; k. Information technology; 	<p>(3) Offer students a career pathway plan of study that establishes an educational progression from secondary through postsecondary, which culminates in a postsecondary educational degree or credential in the student's chosen career field or to a career in the student's identified field in a supportive capacity for students with disabilities whose IEP teams have determined that the student, even with accommodations and or modifications, is unable to meet licensure or certification requirements;</p> <p>(4) Implements third-party assessments as recognized and designated by the department;</p> <p>(5) Is in one of the following nationally recognized career cluster areas:</p> <ul style="list-style-type: none"> a. Agriculture, food, and natural resources; b. Architecture and construction; c. Arts, audiovisual and communications; d. Business, management, and administration; e. Education and training; f. Finance, including personal financial literacy; g. Government and public administration; h. Health science; i. Hospitality and tourism; j. Human services; k. Information technology; 	
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<p>l. Law, public safety, and security;</p> <p>m. Manufacturing;</p> <p>n. Marketing, sales, and services;</p> <p>o. Science, technology, engineering, and mathematics including technology education; and</p> <p>p. Transportation, distribution, and logistics;</p> <p>(6) Provides instruction that embeds:</p> <p>a. Program-related, competency-based academic knowledge;</p> <p>b. High employability skills and performance skills, including:</p> <ol style="list-style-type: none"> 1. Acting as a responsible and contributing citizen and employee; 2. Applying appropriate academic and technical skills; 3. Attending to personal and financial well-being; 4. Communicating clearly, effectively and with reason; 5. Considering the environmental, social and economic impacts of decisions; 6. Demonstrating creativity and innovation; 7. Employing valid and reliable research strategies; 8. Utilizing critical thinking to make sense of problems and persevere in solving them; 	<p>l. Law, public safety, and security;</p> <p>m. Manufacturing;</p> <p>n. Marketing, sales, and services;</p> <p>o. Science, technology, engineering, and mathematics including technology education; and</p> <p>p. Transportation, distribution, and logistics;</p> <p>(6) Provides instruction that embeds:</p> <p>a. Program-related, competency-based academic knowledge;</p> <p>b. High employability skills and performance skills, including:</p> <ol style="list-style-type: none"> 1. Acting as a responsible and contributing citizen and employee; 2. Applying appropriate academic and technical skills; 3. Attending to personal and financial well-being; 4. Communicating clearly, effectively and with reason; 5. Considering the environmental, social and economic impacts of decisions; 6. Demonstrating creativity and innovation; 7. Employing valid and reliable research strategies; 8. Utilizing critical thinking to make sense of problems and persevere in solving them;
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<p>9. Modeling integrity, ethical leadership and effective management;</p> <p>10. Planning education and career path aligned to personal goals;</p> <p>11. Using technology to enhance productivity; and</p> <p>12. Working productively in teams while using cultural/global competence;</p> <p>c. Math, English language arts, and science consistent with RSA 193-C:3, III;</p> <p>d. Occupation-specific skills that provide the individual student with the ability to be college and career ready and able to adapt to the changing demands of the workplace; and</p> <p>e. Supportive capacity for students with disabilities whose IEP teams have determined that even with accommodations the student is unable to meet licensure or certification requirements;</p> <p>(7) Offers approved CTE programs in a safe environment for students that:</p> <p>a. Meets safety standards established by national associations and adopted as administrative rules by New Hampshire licensing boards for the particular career;</p> <p>b. Do not exceed 24 students in each laboratory class; and</p> <p>c. Comply with all state and federal child labor laws;</p>	<p>9. Modeling integrity, ethical leadership and effective management;</p> <p>10. Planning education and career path aligned to personal goals;</p> <p>11. Using technology to enhance productivity; and</p> <p>12. Working productively in teams while using cultural/global competence;</p> <p>c. Math, English language arts, and science consistent with RSA 193-C:3, III;</p> <p>d. Occupation-specific skills that provide the individual student with the ability to be college and career ready and able to adapt to the changing demands of the workplace; and</p> <p>e. Supportive capacity for students with disabilities whose IEP teams have determined that even with accommodations the student is unable to meet licensure or certification requirements;</p> <p>(7) Offers approved CTE programs in a safe environment for students that:</p> <p>a. Meets safety standards established by national associations and adopted as administrative rules by New Hampshire licensing boards for the particular career;</p> <p>b. Do not exceed 24 students in each laboratory class; and</p> <p>c. Comply with all state and federal child labor laws;</p>	
		<p>Same comment as above regarding laboratory classes vs activities.</p>

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<p>(8) Coordinates with postsecondary or apprenticeship programs, or both; and</p> <p>(9) Coordinates with business and industry based programs.</p> <p>(c) Receiving districts shall collaborate with various CTE stakeholders, including, but not limited to:</p> <p>(1) Business and industry, including, but not limited to:</p> <ul style="list-style-type: none"> a. Regional advisory committee participation; b. Program advisory committee participation; c. Core competency development and review; d. National industry standards adherence; and e. State industry economic initiatives and labor demands; <p>(2) Postsecondary institutions;</p> <p>(3) Specific program area state governing boards, including, but not limited to, the:</p> <ul style="list-style-type: none"> a. State board of nursing; b. State board of cosmetology; c. Mechanical licensing board previously known as the plumbing safety and licensing board; d. New Hampshire electricians board; e. State apprenticeship advisory council; 	<p>(8) Coordinates with postsecondary or apprenticeship programs, or both; and</p> <p>(9) Coordinates with business and industry based programs.</p> <p>(c) Receiving districts shall collaborate with various CTE stakeholders, including, but not limited to:</p> <p>(1) Business and industry, including, but not limited to:</p> <ul style="list-style-type: none"> a. Regional advisory committee participation; b. Program advisory committee participation; c. Core competency development and review; d. National industry standards adherence; and e. State industry economic initiatives and labor demands; <p>(2) Postsecondary institutions;</p> <p>(3) Specific program area state governing boards, including, but not limited to, the:</p> <ul style="list-style-type: none"> a. State board of nursing; b. State board of cosmetology; c. Mechanical licensing board previously known as the plumbing safety and licensing board; d. New Hampshire electricians board; e. State apprenticeship advisory council; 	
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<p>f. National foundation; automotive technicians education</p> <p>g. Bureau of emergency medical services; and</p> <p>h. NH fire standards and training commission;</p> <p>(4) State department of labor;</p> <p>(5) U.S. office of vocational and adult education;</p> <p>(6) U.S. office for civil rights; and</p> <p>(7) Other such governing bodies as are identified by the department</p> <p>(d) Each regional CTE center shall establish and provide a comprehensive, sequentially designed curriculum, providing instruction that supports the achievement of the statewide CTE core competencies offered at that regional CTE center.</p> <p>(e) For each CTE program within each regional CTE center, the center shall provide for the ongoing, authentic assessment of competencies aligned with the requirements of Ed 306.34(b)(2) using multiple formative and summative assessment instruments that are aligned with the state and district content and performance standards.</p> <p>(f) Examples of such assessment shall include, but not be limited to:</p> <p>(1) Teacher observations of student performance;</p> <p>(2) Competency-based or performance based assessments;</p> <p>(3) Common assessments developed locally;</p>	<p>f. National foundation; automotive technicians education</p> <p>g. Bureau of emergency medical services; and</p> <p>h. NH fire standards and training commission;</p> <p>(4) State department of labor;</p> <p>(5) U.S. office of vocational and adult education;</p> <p>(6) U.S. office for civil rights; and</p> <p>(7) Other such governing bodies as are identified by the department.</p> <p>(d) Each regional CTE center shall establish and provide a comprehensive, sequentially designed curriculum, providing instruction that supports the achievement of the statewide CTE core competencies offered at that regional CTE center.</p> <p>(e) For each CTE program within each regional CTE center, the center shall provide for the ongoing, authentic assessment of competencies aligned with the requirements of Ed 306.34(b)(2) using multiple formative and summative assessment instruments that are aligned with the state and district content and performance standards.</p> <p>(f) Each CTE center shall report the academic performance of each student on a regular basis as follows:</p> <p>(1) Distribute a summary of individual student performance to parents at least 3 times each year;</p> <p>(2) Provide an opportunity for parents to meet individually with their student's teachers about their</p>	
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<p>(4) Project evaluation rubrics applied to integrated curriculum assignments, extended learning opportunities, and out-of-school learning environments; and</p> <p>(5) Third-party technical assessments that are aligned with industry standards, as recognized and designated by the department.</p> <p>(g) Each CTE center shall report the academic performance of each student on a regular basis as follows:</p> <p>(1) Distribute a summary of individual student performance to parents at least 3 times each year;</p> <p>(2) Provide an opportunity for parents to meet individually with their student's teachers about their student's performance at least once during the school year; and</p> <p>(3) Report aggregate data to all sending schools regarding student performance disaggregated by each career and technical education program.</p> <p>(h) For the CTE programs at all regional CTE centers, centers shall demonstrate how school and student assessment data are used to evaluate, develop and improve curriculum, instruction, and assessment.</p> <p>Ed 306.35 Career Education Program.</p>	<p>student's performance at least once during the school year; and</p> <p>(3) Report aggregate data to all sending schools regarding student performance disaggregated by each career and technical education program.</p> <p>(g) For the CTE programs at all regional CTE centers, centers shall demonstrate how school and student assessment data are used to evaluate, develop and improve curriculum, instruction, and assessment.</p>	
<p>(a) Pursuant to Ed 306.26 and Ed 306.27, the local school board shall require that a comprehensive career education program provides for the infusion of developmentally appropriate knowledge and skill development throughout all areas of the K-12 curriculum, in accordance with RSA 193-C:3, III.</p>	<p>Removed 306.35 and replaced with policy language in Ed 306.04(a)(20)</p>	

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<p>(b) At all grade levels, this comprehensive career education program shall include opportunities for students to:</p> <p>(1) Develop self-knowledge, self-confidence, and self-awareness in defining and refining life and work roles; and</p> <p>(2) Become familiar with the skills and knowledge essential for making individual career and educational decisions.</p> <p>(c) At the middle and high school level, this program shall include systematic instruction and activities designed to enable students to:</p> <p>(1) Develop basic knowledge, attitudes, and competencies that promote success on the job;</p> <p>(2) Collect and evaluate data related to current and emerging employment opportunities;</p> <p>(3) Use available resources in planning and decision making regarding educational and career objectives;</p> <p>(4) Understand the wide variety and interrelatedness of occupations; and</p> <p>(5) Develop career interests and an awareness of the training and skills required for success.</p> <p><u>Ed 306.37 English/Language Arts and Reading Program.</u></p>	<p><u>Ed 306.37 English/Language Arts and Reading Program.</u></p> <p>(a) The school board shall provide an English/language arts and reading program in each elementary school consistent with competencies determined pursuant to Ed 306.26, which may include:</p>			<p>Revised language</p>
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<p>(1) Systematic and continuous instruction which develops students' knowledge of language arts, including listening, speaking, reading, writing, and viewing;</p> <p>(2) Instruction which emphasizes how to clarify, order, interpret, and communicate experiences through the skillful use of language;</p> <p>(3) Opportunities for each student to exercise, with fluency and ease, oral and written skills and to become acquainted with others' interpretations of experiences through fiction and informational materials, film, television, and other media;</p> <p>(4) An environment which promotes the importance of reading;</p> <p>(5) Opportunities for each child to become literate;</p> <p>(6) Methods for assessing students for appropriate placement in the reading/language arts program, including diagnostic assessment for remediation;</p> <p>(7) Support for teachers on interpreting test results;</p> <p>(8) Continuous monitoring of each student's progress from grade to grade;</p> <p>(9) Early intervention or remediation;</p> <p>(10) Instruction for teachers in reading in the content areas; and</p> <p>(11) Training for instructional staff on methods for effectively meeting the language arts/reading needs of all students and on current developments in language arts/reading.</p>	<p>(1) Systematic and continuous instruction which develops students' knowledge of language arts, including listening, speaking, reading, writing, and viewing;</p> <p>(2) Instruction which emphasizes how to clarify, order, interpret, and communicate experiences through the skillful use of language;</p> <p>(3) Opportunities for each student to exercise, with fluency and ease, oral and written skills and to become acquainted with others' interpretations of experiences through fiction and informational materials, film, television, and other media;</p> <p>(4) An environment which promotes the importance of reading;</p> <p>(5) Opportunities for each child to become literate;</p> <p>(6) Methods for assessing students for appropriate placement in the reading/language arts program, including diagnostic assessment for remediation;</p> <p>(7) Support for teachers on interpreting test results;</p> <p>(8) Continuous monitoring of each student's progress from grade to grade;</p> <p>(9) Early intervention or remediation;</p> <p>(10) Instruction for teachers in reading in the content areas; and</p> <p>(11) Training for instructional staff on methods for effectively meeting the language arts/reading needs of all students and on current developments in language arts/reading.</p>	
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<p>(b) Pursuant to Ed 306.26, the local school board shall require that an English/language arts and reading program in each middle school provides:</p> <p>(1) Instruction which emphasizes the use of language to clarify, order, interpret, and communicate experiences including instruction in listening, speaking, reading, writing, and viewing;</p> <p>(2) Opportunities for each student to develop oral and written skills and to become acquainted with others' interpretations of experiences through fiction and informational materials, film, television, and other media; and</p> <p>(3) Systematic instruction and activities designed to enable student to:</p> <ol style="list-style-type: none"> a. Comprehend and produce progressively more complex oral and written language using various patterns of organization, such as narration, description, enumeration, sequence, cause/effect, comparison/contrast, and problem solution; b. Recognize and create literary elements, such as plot, character, setting and point of view in a variety of genres; c. Apply the writing process, including choosing a topic, generating ideas and locating information, drafting, revising, and editing; d. Increase vocabulary through semantics, use of the dictionary, structural analysis, including prefixes and suffixes, and other strategies; e. Apply previously learned reading skills to content materials; 	<p>(b) The school board shall provide an English/language arts and reading program in each middle school, consistent with competencies determined pursuant to Ed 306.26, which may include:</p> <p>(1) Instruction which emphasizes the use of language to clarify, order, interpret, and communicate experiences including instruction in listening, speaking, reading, writing, and viewing;</p> <p>(2) Opportunities for each student to develop oral and written skills and to become acquainted with others' interpretations of experiences through fiction and informational materials, film, television, and other media; and</p> <p>(3) Systematic instruction and activities designed to enable student to:</p> <ol style="list-style-type: none"> a. Comprehend and produce progressively more complex oral and written language using various patterns of organization, such as narration, description, enumeration, sequence, cause/effect, comparison/contrast, and problem solution; b. Recognize and create literary elements, such as plot, character, setting and point of view in a variety of genres; c. Apply the writing process, including choosing a topic, generating ideas and locating information, drafting, revising, and editing; d. Increase vocabulary through semantics, use of the dictionary, structural analysis, including prefixes and suffixes, and other strategies;
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<p>f. Acquire new reading skills and fluency through remedial, developmental, and enrichment programs;</p> <p>g. Use appropriate reading techniques to acquire knowledge, including setting the purpose for reading, varying reading speed, and reading for comprehension at the literal, inferential, evaluative, critical, and analytical levels;</p> <p>h. Read to satisfy personal interests and recognize that fiction and informational materials can offer insight into life; and</p> <p>i. Employ appropriate study skills, including the ability to locate materials, take notes, organize information, and use a variety of sources.</p> <p>(c) Pursuant to Ed 306.27, the local school board shall require that an English/language arts program in each high school provides:</p> <p>(1) Opportunities for students to become familiar with the history, structure, and use of English as the basic medium of communication in our society;</p> <p>(2) Opportunities for students to develop proficiency and control in the use of language, an appreciation of a variety of literary forms, an understanding and appreciation of various aspects of past and present cultures as expressed in literature, and interests for lifelong learning;</p> <p>(3) Courses totaling at least 6 credits in English which shall be distributed as follows:</p> <p>a. At least 4 credits required of all students and planned as a purposeful sequence of study which promotes:</p>	<p>e. Apply previously learned reading skills to content materials;</p> <p>f. Acquire new reading skills and fluency through remedial, developmental, and enrichment programs;</p> <p>g. Use appropriate reading techniques to acquire knowledge, including setting the purpose for reading, varying reading speed, and reading for comprehension at the literal, inferential, evaluative, critical, and analytical levels;</p> <p>h. Read to satisfy personal interests and recognize that fiction and informational materials can offer insight into life; and</p> <p>i. Employ appropriate study skills, including the ability to locate materials, take notes, organize information, and use a variety of sources.</p> <p>(c) The school board shall provide an English/language arts and reading program at each high school, consistent with competencies developed pursuant to Ed 306.27, which may include:</p> <p>(1) Opportunities for students to become familiar with the history, structure, and use of English as the basic medium of communication in our society;</p> <p>(2) Opportunities for students to develop proficiency and control in the use of language, an appreciation of a variety of literary forms, an understanding and appreciation of various aspects of past and present cultures as expressed in literature, and interests for lifelong learning;</p> <p>(3) Courses totaling at least 6 credits in English which shall be distributed as follows:</p>
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<p>1. The development of the basic language skills of listening, speaking, reading, writing, and viewing;</p> <p>2. The acquisition of knowledge; and</p> <p>3. The understanding of literature and our literary heritage; and</p> <p>b. At least 2 elective credits designed to provide increased proficiency in the basic language skills and/or an expanded knowledge and understanding of literature and which may be met by such courses as advanced writing, public speaking, debating, dramatics, humanities, and world literature; and</p> <p>(4) Systematic instruction and activities designed to enable students to:</p> <p>a. Develop effective listening and discussion techniques, distinguish fact from opinion, and identify the principle idea;</p> <p>b. Write and present speeches for a variety of purposes and audiences;</p> <p>c. Understand and apply the writing process by choosing a topic, generating ideas and locating information, drafting, revising, and editing in order to write well-organized, legible, well-supported papers;</p> <p>d. Correctly use the conventions of standard English, such as grammar, punctuation, spelling, capitalization, and word usage, in all written work;</p> <p>e. Increase reading speed and comprehension and develop thinking skills, such as inference, applying knowledge, and making judgments.</p>	<p>a. At least 4 credits required of all students and planned as a purposeful sequence of study which promotes:</p> <p>1. The development of the basic language skills of listening, speaking, reading, writing, and viewing;</p> <p>2. The acquisition of knowledge; and</p> <p>3. The understanding of literature and our literary heritage; and</p> <p>b. At least 2 elective credits designed to provide increased proficiency in the basic language skills and/or an expanded knowledge and understanding of literature and which may be met by such courses as advanced writing, public speaking, debating, dramatics, humanities, and world literature; and</p> <p>(4) Systematic instruction and activities designed to enable students to:</p> <p>a. Develop effective listening and discussion techniques, distinguish fact from opinion, and identify the principle idea;</p> <p>b. Write and present speeches for a variety of purposes and audiences;</p> <p>c. Understand and apply the writing process by choosing a topic, generating ideas and locating information, drafting, revising, and editing in order to write well-organized, legible, well-supported papers;</p> <p>d. Correctly use the conventions of standard English, such as grammar, punctuation, spelling, capitalization, and word usage, in all written work;</p>	
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<p>f. Develop word recognition skills, such as context clues, prefixes, suffixes, and phonetic analysis, in order to develop an increased vocabulary;</p> <p>g. Understand ideas presented in a variety of visual formats such as television advertisements and political cartoons;</p> <p>h. Know and appreciate both traditional and contemporary literature, including English, American, and works in translation;</p> <p>i. Understand literary analysis through discussion and writing activities;</p> <p>j. Recognize how our literary heritage relates to the customs, ideas, and values of today's life and culture; and</p> <p>k. Develop study skills which contribute to academic success, such as using the dictionary, note taking, locating information, distinguishing good sources of information from bad sources, and applying information in solving of real-life problems.</p>	<p>e. Increase reading speed and comprehension and develop thinking skills, such as inference, applying knowledge, and making judgments;</p> <p>f. Develop word recognition skills, such as context clues, prefixes, suffixes, and phonetic analysis, in order to develop an increased vocabulary;</p> <p>g. Understand ideas presented in a variety of visual formats such as television advertisements and political cartoons;</p> <p>h. Know and appreciate both traditional and contemporary literature, including English, American, and works in translation;</p> <p>i. Understand literary analysis through discussion and writing activities;</p> <p>j. Recognize how our literary heritage relates to the customs, ideas, and values of today's life and culture; and</p> <p>k. Develop study skills which contribute to academic success, such as using the dictionary, note taking, locating information, distinguishing good sources of information from bad sources, and applying information in solving of real-life problems.</p>	
<p>Ed 306.38 Family and Consumer Science Education Program.</p> <p>(a) Pursuant to Ed.306.26 and Ed. 306.27, the local school board shall require that a family and consumer science education program be provided in each middle school.</p>	<p>Ed 306.38 Family and Consumer Science Education Program.</p> <p>(a) The school board shall <i>provide</i> a family and consumer science education program in each middle school, <i>consistent with competencies developed pursuant to Ed 306.26, which may include:</i></p>	<p>Revised language</p> <p>Removed paragraphs (2) and (3)</p>

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<p>(b) The middle school program shall provide planned learning strategies and opportunities to prepare independent, educated consumers that are literate in life skills that provide:</p> <p>(1) Students with teaching and instructional practice that:</p> <ul style="list-style-type: none"> a. Prepare students for college, career, and citizenship; b. Promote optimal nutrition education that supports district wellness policies; c. Use critical and creative thinking skills to promote problem solving in diverse family, community and work environments; d. Demonstrate creative thinking, constructs knowledge, and develops innovative products and processes using technology; e. Use critical thinking skills to plan and conduct research, manage projects, solve problems, and make informed decisions; f. Supports literacy in math, language arts, and science; and g. Manage the challenges of living and working in a diverse global society; <p>(2) Experiences that support students' 21st century learning, including, but not limited to:</p> <ul style="list-style-type: none"> a. Collecting, analyzing, organizing, and presenting information; b. Decision making and problem solving; 	<p>(b) The middle school program shall provide planned learning strategies and opportunities to prepare independent, educated consumers that are literate in life skills that provide:</p> <p>(1) Students with teaching and instructional practice that:</p> <ul style="list-style-type: none"> a. Prepare students for college, career, and citizenship; b. Promote optimal nutrition education that supports district wellness policies; c. Use critical and creative thinking skills to promote problem solving in diverse family, community and work environments; d. Demonstrate creative thinking, constructs knowledge, and develops innovative products and processes using technology; e. Use critical thinking skills to plan and conduct research, manage projects, solve problems, and make informed decisions; f. Supports literacy in math, language arts, and science; and g. Manage the challenges of living and working in a diverse global society; <p>(c) The local school board shall provide a family and consumer education program in each high school, consistent with competencies pursuant to Ed 306.27, which may include:</p> <ul style="list-style-type: none"> (d) Planned learning strategies and opportunities that: 	
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<p>c. Self-management;</p> <p>d. Communication and conflict resolution; and</p> <p>e. Technological literacy; and</p> <p>(3) Experiences which develop students' knowledge and skills in:</p> <p>a. Managing foods and nutrition;</p> <p>b. Consumer financial literacy; and</p> <p>c. Human growth and development;</p> <p>(c) The local school board shall require that a family and consumer science education program be provided in each high school.</p> <p>(d) The program in each high school shall provide planned learning strategies and opportunities that:</p> <p>(1) Enable students to develop an awareness of career opportunities and to function as leaders in family, community, and work settings;</p> <p>(2) Provide students with knowledge and experience in the following areas of:</p> <p>a. Foods and nutrition;</p> <p>b. Human growth and development;</p> <p>c. Consumer and resource management; and</p> <p>d. Textiles and design.</p> <p>(e) Each district shall establish and provide a comprehensive, sequentially designed, family and consumer science curriculum that will meet the minimum standards for college and career readiness and that provide for continued growth in all content areas consistent with RSA 193-C:3, III.</p> <p>(f) For family and consumer science programs, schools shall provide for the ongoing, authentic assessment of student learning outcomes through multiple formative and summative assessment instruments that are aligned with the state and district content and performance standards.</p> <p>(g) <i>Sound assessment practices consistent with Ed 306.24;</i></p> <p>(h) Family and consumer science programs shall report the academic performance of all students on a regular basis by providing the following:</p> <p>(1) A summary of individual student performance to parents at least 4 times per course; and</p>	<p>(1) Enable students to develop an awareness of career opportunities and to function as leaders in family, community, and work settings;</p> <p>(2) Provide students with knowledge and experience in the following areas of:</p> <p>a. Foods and nutrition;</p> <p>b. Human growth and development;</p> <p>c. Consumer and resource management; and</p> <p>d. Textiles and design.</p> <p>(e) Each district shall establish and provide a comprehensive, sequentially designed, family and consumer science curriculum that will meet the minimum standards for college and career readiness and that provide for continued growth in all content areas consistent with RSA 193-C:3, III.</p> <p>(f) For family and consumer science programs, schools shall provide for the ongoing, authentic assessment of student learning outcomes through multiple formative and summative assessment instruments that are aligned with the state and district content and performance standards.</p> <p>(g) <i>Sound assessment practices consistent with Ed 306.24;</i></p> <p>(h) Family and consumer science programs shall report the academic performance of all students on a regular basis by providing the following:</p> <p>(1) A summary of individual student performance to parents at least 4 times per course; and</p>
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<p>and that provide for continued growth in all content areas consistent with RSA 193-C:3, III.</p>	<p>(2) The opportunity for parents to meet individually with their students' teachers about their students' performance at least once during each school year.</p>	
<p>(f) For family and consumer science programs, schools shall provide for the ongoing, authentic assessment of student learning outcomes through multiple formative and summative assessment instruments that are aligned with the state and district content and performance standards.</p>	<p>(i) For the family and consumer science programs at each grade level, schools shall demonstrate how school and student assessment data are used to evaluate, develop, and improve curriculum, instruction, and assessment.</p>	<p>Grade level or learning level? Document should be consistent.</p>
<p>(g) Examples of such assessment shall include, but not be limited to:</p>		
<p>(1) Teacher observations of student performance;</p>		
<p>(2) Competency-based or performance based assessments;</p>		
<p>(3) The use of real-life relevant tasks, laboratories, simulations, and community involvement;</p>		
<p>(4) Common assessments developed locally; and</p>		
<p>(5) Project evaluation rubrics used to evaluate family and consumer science competencies applied to integrated curriculum assignments, extended learning opportunities, and out-of-school learning environments.</p>		
<p>(h) Family and consumer science programs shall report the academic performance of all students on a regular basis by providing the following:</p>		
<p>(1) A summary of individual student performance to parents at least 4 times per course; and</p>		
<p>(2) The opportunity for parents to meet individually with their students' teachers about their students' performance at least once during each school year.</p>		

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<p>(i) For the family and consumer science programs at each grade level, schools shall demonstrate how school and student assessment data are used to evaluate, develop, and improve curriculum, instruction, and assessment.</p>			
<p><u>Ed 306.39 School Counseling Program.</u> (a) The local school board shall require that each school in its district provides for the implementation of a comprehensive school counseling program based on this section and “The ASCA National Model: A Foundation for School Counseling Program,” published by the American School Counselor Association (ASCA) in 2012 as referenced in Appendix II as an integral part of the total educational program. The local school board shall require that each district develop and have on file a comprehensive K-12 School counseling program policy and implementation plan consistent with the components in this section and kept current biennially.</p>	<p><u>Ed 306.39 School Counseling Program.</u> (a) The school board shall require that each school in its district provides for the implementation of a comprehensive school counseling program based on this section and “The ASCA National Model: A Foundation for School Counseling Program,” published by the American School Counselor Association (ASCA) in 2012 as referenced in Appendix II as an integral part of the total educational program. The local school board shall require that each district develop and have on file a comprehensive K-12 School counseling program policy and implementation plan consistent with the components in this section and kept current biennially.</p>	<p>No change</p>	
<p>(b) The K-12 school counseling program shall include a comprehensive sequence of learning opportunities designed to promote each student’s development of work-study practices in academic development, career development, and personal/social development by means of the following components:</p>	<p>(b) The K-12 school counseling program shall include a comprehensive sequence of learning opportunities designed to promote each student’s development of work-study practices in academic development, career development, and personal/social development by means of the following components:</p>		
<p>(1) A school counseling core curriculum based on the ASCA student competencies and local goals, designed to help students attain the desired work-study practices and to provide all students with the knowledge, attitudes and skills appropriate to their developmental level, including prevention and intervention activities. The school counseling core</p>	<p>(1) A school counseling core curriculum based on the ASCA student competencies and local goals, designed to help students attain the desired work-study practices and to provide all students with the knowledge, attitudes and skills appropriate to their developmental level, including prevention and intervention activities. The school counseling core</p>		

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<p>curriculum shall be delivered throughout the school's overall curriculum and be systematically presented by school counselors in collaboration with other professional educators in K-12 classroom and group activities;</p> <p>(2) Individual student planning that is coordinated and systematic including activities designed to assist students in establishing personal goals, developing future plans, and attaining college and career-ready, work-study practices;</p> <p>(3) Responsive services to meet students' immediate needs and concerns and counselor teaming in crisis response;</p> <p>(4) School counseling program management including data-driven decision-making reflective of the school's needs; and</p> <p>(5) Consultation and collaboration with parents, teachers, other educators, and community organizations, and referral of students for additional assistance.</p> <p>(c) For the school counseling programs in grades K-12, the performance of the school counselor(s) shall be evaluated on knowledge, abilities, skills and attitudes necessary to plan, organize, implement and evaluate the implementation of a comprehensive school counseling program based on the ASCA national model.</p> <p>(d) For the school counseling programs in grades K-12, schools shall demonstrate the effectiveness of the local comprehensive school counseling program through a summary report of student performance in:</p>	<p>curriculum shall be delivered throughout the school's overall curriculum and be systematically presented by school counselors in collaboration with other professional educators in K-12 classroom and group activities;</p> <p>(2) Individual student planning that is coordinated and systematic including activities designed to assist students in establishing personal goals, developing future plans, and attaining college and career-ready, work-study practices;</p> <p>(3) Responsive services to meet students' immediate needs and concerns and counselor teaming in crisis response;</p> <p>(4) School counseling program management including data-driven decision-making reflective of the school's needs; and</p> <p>(5) Consultation and collaboration with parents, teachers, other educators, and community organizations, and referral of students for additional assistance.</p> <p>(c) For the school counseling programs in grades K-12, the performance of the school counselor(s) shall be evaluated on knowledge, abilities, skills and attitudes necessary to plan, organize, implement and evaluate the implementation of a comprehensive school counseling program based on the ASCA national model.</p> <p>(d) For the school counseling programs in grades K-12, schools shall demonstrate the effectiveness of the local comprehensive school counseling program through a summary report of student performance in:</p>	<p>Grade levels or learning levels?</p>
<p>curriculum shall be delivered throughout the school's overall curriculum and be systematically presented by school counselors in collaboration with other professional educators in K-12 classroom and group activities;</p> <p>(2) Individual student planning that is coordinated and systematic including activities designed to assist students in establishing personal goals, developing future plans, and attaining college and career-ready, work-study practices;</p> <p>(3) Responsive services to meet students' immediate needs and concerns and counselor teaming in crisis response;</p> <p>(4) School counseling program management including data-driven decision-making reflective of the school's needs; and</p> <p>(5) Consultation and collaboration with parents, teachers, other educators, and community organizations, and referral of students for additional assistance.</p> <p>(c) For the school counseling programs in grades K-12, the performance of the school counselor(s) shall be evaluated on knowledge, abilities, skills and attitudes necessary to plan, organize, implement and evaluate the implementation of a comprehensive school counseling program based on the ASCA national model.</p> <p>(d) For the school counseling programs in grades K-12, schools shall demonstrate the effectiveness of the local comprehensive school counseling program through a summary report of student performance in:</p>	<p>curriculum shall be delivered throughout the school's overall curriculum and be systematically presented by school counselors in collaboration with other professional educators in K-12 classroom and group activities;</p> <p>(2) Individual student planning that is coordinated and systematic including activities designed to assist students in establishing personal goals, developing future plans, and attaining college and career-ready, work-study practices;</p> <p>(3) Responsive services to meet students' immediate needs and concerns and counselor teaming in crisis response;</p> <p>(4) School counseling program management including data-driven decision-making reflective of the school's needs; and</p> <p>(5) Consultation and collaboration with parents, teachers, other educators, and community organizations, and referral of students for additional assistance.</p> <p>(c) For the school counseling programs in grades K-12, the performance of the school counselor(s) shall be evaluated on knowledge, abilities, skills and attitudes necessary to plan, organize, implement and evaluate the implementation of a comprehensive school counseling program based on the ASCA national model.</p> <p>(d) For the school counseling programs in grades K-12, schools shall demonstrate the effectiveness of the local comprehensive school counseling program through a summary report of student performance in:</p>	<p>Grade levels or learning levels?</p>

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<p>achievement, attendance, and behavior to the local school board at least once a year.</p> <p>(e) The staff requirements for provision of the comprehensive developmental guidance and counseling program shall be as set forth in Ed 306.15(b).</p>	<p>achievement, attendance, and behavior to the local school board at least once a year.</p> <p>(e) The staff requirements for provision of the comprehensive developmental guidance and counseling program shall be as set forth in Ed 306.15(b).</p>	
<p><u>Ed 306.40 Health Education Program.</u></p> <p>(a) Pursuant to Ed 306.26 and Ed 306.27, the local school board shall require that a school health education program for grades 1-12 provides:</p> <ol style="list-style-type: none"> (1) Health education; (2) School health services; (3) Food and nutrition services; (4) A comprehensive guidance and counseling program; (5) [Healthy school] facilities; and (6) Family and community partnerships. <p>(b) The local school board shall require that each school health education program provides:</p> <ol style="list-style-type: none"> (1) Systematic instruction in grades K-12, designed to enable students to: <ol style="list-style-type: none"> a. Comprehend concepts related to health promotion and disease prevention, linking to all content areas; b. Demonstrate functional knowledge of the most important and enduring ideas, issues, and concepts related to achieving good health; 	<p><u>Ed 306.40 Health Education Program.</u></p> <p>(a) The school board shall <i>provide</i> a health education program <i>at all schools consistent with competencies pursuant to Ed 306.26 and Ed 306.27, which may include:</i></p> <ol style="list-style-type: none"> (1) Health education; (2) School health services; (3) Food and nutrition services; (4) A comprehensive guidance and counseling program; (5) Healthy school facilities; and (6) Family and community partnerships. <p>(b) The local school board shall require that each school health education program provides:</p> <ol style="list-style-type: none"> (1) Systematic instruction in grades K-12, designed to enable students to: <ol style="list-style-type: none"> a. Comprehend concepts related to health promotion and disease prevention, linking to all content areas; b. Demonstrate functional knowledge of the most important and enduring ideas, issues, and concepts related to achieving good health; 	<p style="text-align: center;">Revised language</p> <p style="text-align: right;">Grade levels or learning levels?</p>

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<p>c. Demonstrate the ability to access valid health information and health-promoting products and services;</p> <p>d. Demonstrate the ability to practice health enhancing behaviors and reduce health risks;</p> <p>e. Analyze the effect of culture, media, technology, and other influences on health;</p> <p>f. Demonstrate the ability to use interpersonal communications skills to enhance health;</p> <p>g. Demonstrate the ability to use goal-setting and decision making skills to enhance health; and</p> <p>h. Demonstrate the ability to advocate for personal, family, and community health;</p> <p>(2) A planned K-12 curriculum in health education designed to teach the skills listed in (b)(1) above across the following content areas of health education:</p> <p>a. Alcohol and other drug use prevention, in accordance with RSA 189:10;</p> <p>b. Injury prevention;</p> <p>c. Nutrition;</p> <p>d. Physical activity;</p> <p>e. Family life and comprehensive sexuality education, including instruction relative to abstinence and sexually transmitted infections in accordance with RSA 189:10;</p> <p>f. Tobacco use prevention;</p>	<p>c. Demonstrate the ability to access valid health information and health-promoting products and services;</p> <p>d. Demonstrate the ability to practice health enhancing behaviors and reduce health risks;</p> <p>e. Analyze the effect of culture, media, technology, and other influences on health;</p> <p>f. Demonstrate the ability to use interpersonal communications skills to enhance health;</p> <p>g. Demonstrate the ability to use goal-setting and decision making skills to enhance health; and</p> <p>h. Demonstrate the ability to advocate for personal, family, and community health;</p> <p>(2) A planned K-12 curriculum in health education designed to teach the skills listed in (b)(1) above across the following content areas of health education:</p> <p>a. Alcohol and other drug use prevention, in accordance with RSA 189:10;</p> <p>b. Injury prevention;</p> <p>c. Nutrition;</p> <p>d. Physical activity;</p> <p>e. Family life and comprehensive sexuality education, including instruction relative to abstinence and sexually transmitted infections in accordance with RSA 189:10;</p> <p>f. Tobacco use prevention;</p>	<p>Will learning levels have unintended outcomes because of age differences on topics such as this?</p>
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<p>g. Mental health;</p> <p>h. Personal and consumer health; and</p> <p>i. Community and environmental health; and</p> <p>(3) Sound assessment practices in health education that:</p> <p>a. Match goals and objectives;</p> <p>b. Require evaluation and synthesis of knowledge and skills;</p> <p>c. Emphasize higher order thinking skills;</p> <p>d. Clearly indicate what the student is asked to do but not how to do it;</p> <p>e. Are at the appropriate reading level;</p> <p>f. Have criteria that are clear to students and teachers;</p> <p>g. Are engaging and relevant to students;</p> <p>h. Link to ongoing instruction;</p> <p>i. Provide feedback to students;</p> <p>j. Provide cost-effective benefits to students;</p> <p>k. Reflect real world situations; and</p> <p>l. Emphasize use of available knowledge and skills in relevant problem contexts.</p> <p>Ed 306.41 <u>Physical Education Program.</u></p> <p>(a) Pursuant to Ed 306.26 and Ed 306.27, the local school board shall require that a school physical education program for grades 1-12 provides:</p>	<p>g. Mental health;</p> <p>h. Personal and consumer health; and</p> <p>i. Community and environmental health; and</p> <p>(3) Sound assessment practices <i>consistent with Ed 306.24.</i></p>	
<p>Ed 306.41 <u>Physical Education Program.</u></p> <p>(a) Pursuant to Ed 306.26 and Ed 306.27, the local school board shall require that a school physical education program for grades 1-12 provides:</p>	<p>Ed 306.41 <u>Physical Education Program.</u></p> <p>(a) <i>The school board shall provide a physical education program at each school consistent with</i></p>	<p>Revised language</p> <p>Renumbered</p>

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<p>(1) Physical education as provided in (b) below; and</p> <p>(2) Family and community partnerships.</p> <p>(b) In the area of physical education, the local school board shall require that each school physical education program provides:</p> <p>(1) Systematic instruction in grades 1-12, designed to enable students to:</p> <ul style="list-style-type: none"> a. Demonstrate competency in motor skills and movement patterns needed to perform a variety of physical activities; b. Demonstrate understanding of movement concepts, principles, and performance of physical activities; c. Participate regularly in physical activity; d. Achieve and maintain a health enhancing level of physical fitness; e. Exhibit responsible personal and social behavior that respects self and others in physical activity settings; and f. Value physical activity for health, enjoyment, challenge, self expression, and social interaction. <p>(2) A planned 1-12 curriculum in physical education that will provide for:</p> <ul style="list-style-type: none"> a. A variety of motor skills that are designed to enhance the physical, mental, social, and emotional development of every child; 	<p><i>competencies pursuant to Ed 306.26 and Ed 306.27, which may include:</i></p> <p>(1) Physical education as provided in (b) below; and</p> <p>(2) Family and community partnerships.</p> <p>(b) Systematic instruction in grades 1-12, designed to enable students to:</p> <ul style="list-style-type: none"> (1) Demonstrate competency in motor skills and movement patterns needed to perform a variety of physical activities; (2) Demonstrate understanding of movement concepts, principles, and performance of physical activities; (3) Participate regularly in physical activity; (4) Achieve and maintain a health enhancing level of physical fitness; (5) Exhibit responsible personal and social behavior that respects self and others in physical activity settings; and (6) Value physical activity for health, enjoyment, challenge, self expression, and social interaction. (7) A variety of motor skills that are designed to enhance the physical, mental, social, and emotional development of every child; (8) Fitness education and assessment to help children understand and improve or maintain their physical well-being; 	<p>Attends levels or learning levels?</p>
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<p>b. Fitness education and assessment to help children understand and improve or maintain their physical well-being;</p> <p>c. Development of cognitive concepts about motor skills and fitness;</p> <p>d. Opportunities to improve children's emerging social and cooperative skills and to gain a multicultural perspective;</p> <p>e. Promotion of regular amounts of appropriate physical activity now and throughout life; and</p> <p>f. Utilization of technology in attaining instruction, curricular, and assessment goals; and</p> <p>(3) Sound assessment practices in physical education that:</p> <ol style="list-style-type: none"> Match goals and objectives; Require evaluation and synthesis of knowledge and skills; Emphasize higher-order thinking skills; Clearly indicate what the student is asked to do; Are at an appropriate skill level according to: <ol style="list-style-type: none"> State standards; and The needs of the individual; Have criteria that are clear to students and teacher; Are engaging and relevant to students; Link to ongoing instruction; 	<p>(9) Development of cognitive concepts about motor skills and fitness;</p> <p>(10) Opportunities to improve children's emerging social and cooperative skills and to gain a multicultural perspective;</p> <p>(11) Promotion of regular amounts of appropriate physical activity now and throughout life; and</p> <p>(13) Utilization of technology in attaining instruction, curricular, and assessment goals; and</p> <p>(c) <i>Sound assessment practices consistent with Ed 306.24;</i></p>	
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<p>i. Provide feedback to students;</p> <p>j. Provide cost-effective benefits to students;</p> <p>k. Reflect real-world situations; and</p> <p>l. Emphasize use of available knowledge and skills in relevant <i>problem</i> contexts</p> <p>Ed 306.42 <u>Digital Literacy Program</u></p> <p>(a) The local school board shall require an integrated approach to the use of 21st century tools, including, but not limited to technology and communication tools, within all curriculum areas through the adoption of an information and communication technologies literacy (ICT) program in grades 1 - 12 that provides opportunities at developmentally appropriate levels for students to:</p> <p>(1) Develop knowledge of ethical, responsible use of technology tools in a society that relies heavily on knowledge of information in its decision-making;</p> <p>(2) Become proficient in the use of 21st century tools to access, manage, integrate, evaluate, and create information within the context of the core subjects of:</p> <p>a. Reading;</p> <p>b. Mathematics;</p> <p>c. English and language arts;</p> <p>d. Science;</p> <p>e. Social studies, including civics, government, economics, history, and geography;</p>	<p>Ed 306.42 <u>Digital Literacy Program</u>.</p> <p>(a) The local school board shall provide an integrated approach to the use of 21st century tools, including, but not limited to technology and communication tools, within all curriculum areas through the adoption of a digital literacy program in learning levels 1 - 12 that provides opportunities at developmentally appropriate levels for students to:</p> <p>(1) Develop knowledge of ethical, responsible, and safe use of technology tools in a society that relies heavily on knowledge of information in its decision-making;</p> <p>(2) Become proficient in the use of 21st century tools to access, manage, integrate, evaluate, and create information within the required subject areas identified in Table 306-1;</p> <p>(3) Use digital tools to develop cognitive proficiency in literacy, numeracy, problem solving, decision making, and spatial/visual literacy;</p> <p>(4) Use digital tools to develop technical proficiency at a foundation knowledge level in:</p> <p>a. Hardware;</p> <p>b. Software applications;</p>	<p>Revised language</p> <p>Inconsistent language</p>
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<p>f. Arts; and</p> <p>g. World languages;</p> <p>(3) Use 21st century tools to develop cognitive proficiency in:</p> <ol style="list-style-type: none"> Literacy; Numeracy; Problem solving; Decision making; and Spatial/ visual literacy; <p>(4) Use 21st century tools to develop technical proficiency at a foundation knowledge level in:</p> <ol style="list-style-type: none"> Hardware; Software applications; Networks; and Elements of digital technology; and <p>(5) Create digital portfolios which:</p> <ol style="list-style-type: none"> Address the following components: <ol style="list-style-type: none"> Basic operations and concepts; Social, ethical, and human issues; Technology productivity tools; Technology communications tools; Technology research tools; and 	<p>e. Networks; and</p> <p>d. Elements of digital technology; and</p> <p>(5) Create digital portfolios which:</p> <ol style="list-style-type: none"> Address the following components: <ol style="list-style-type: none"> Basic operations and concepts; Social, ethical, and human issues; Technology productivity tools; Technology communications tools; Technology research tools; and The school board shall provide opportunities for students to demonstrate <i>digital literacy</i> competency by the end of 8th grade using assessment rubrics applied to the contents of digital portfolios as required in (a)(5) above. Students who successfully demonstrate knowledge, skill, and understanding of these competencies shall have the opportunity, as high school students, to take a higher level computer course to meet the ½ credit requirement. The school board shall provide opportunities for students to complete a ½ credit <i>digital literacy</i> course prior to high school graduation; 	
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<p>6. Technology problem solving and decision-making tools;</p> <p>b. Represent proficient, ethical, responsible use of 21st century tools within the context of the core subjects; and</p> <p>c. Include, at a minimum, such digital artifacts as:</p> <ol style="list-style-type: none"> 1. Standardized tests; 2. Observation; 3. Student work; and 4. Comments describing a student's reflection on his/her work. <p>(b) The local school board shall provide opportunities for students to demonstrate ICT competency by the end of 8th grade using assessment rubrics applied to the contents of digital portfolios as required in (a)(5) above. Students who successfully demonstrate knowledge, skill, and understanding of these competencies shall have the opportunity, as high school students, to take a higher level computer course to meet the ½ credit requirement.</p> <p>(c) The local school board shall provide opportunities for students to complete a ½ credit ICT course prior to high school graduation, including, but not limited to:</p> <ol style="list-style-type: none"> (1) Use of common productivity and web based software; (2) Use of a variety of multimedia software and equipment; 		
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<p>(3) Configuring computers and basic network configurations; and</p> <p>(4) Applying programming concepts used in software development.</p> <p>Ed 306.43 <u>Mathematics Program</u></p> <p>(a) Pursuant to Ed 306.26, the local school board shall require that a mathematics program in each elementary grade, excluding kindergarten, provides:</p> <p>(1) Opportunities for all students to solve problems by:</p> <ol style="list-style-type: none"> Using multiple strategies; Communicating mathematical ideas through speaking and writing; and Making logical connections between different mathematical concepts; <p>(2) Opportunities for all students to build and construct knowledge and understanding of mathematical concepts through developmentally appropriate activities that include concrete experiences and interactions with manipulatives, technology, and their environment;</p> <p>(3) Opportunities for authentic tasks that:</p> <ol style="list-style-type: none"> Promote student decision making and questioning; Encourage students to develop unique problem solving strategies while allowing students to defend their strategies and results; 	<p>Ed 306.43 <u>Mathematics Program</u></p> <p>(a) <i>The school board shall provide a mathematics program at each elementary school consistent with competencies pursuant to Ed 306.26, which may include:</i></p> <p>(1) Opportunities for all students to solve problems by:</p> <ol style="list-style-type: none"> Using multiple strategies; Communicating mathematical ideas through speaking and writing; and Making logical connections between different mathematical concepts; <p>(2) Opportunities for all students to build and construct knowledge and understanding of mathematical concepts through developmentally appropriate activities that include concrete experiences and interactions with manipulatives, technology, and their environment;</p> <p>(3) Opportunities for authentic tasks that:</p> <ol style="list-style-type: none"> Promote student decision making and questioning; Encourage students to develop unique problem solving strategies while allowing students to defend their strategies and results; 	<p>Revised language</p>
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<p>(4) Planned activities that promote developing mathematical concepts from the concrete to the representational and finally to the abstract level;</p> <p>(5) Opportunities for all students to develop positive attitudes such as inquisitiveness and appreciation of the multiple ways to approach and solve mathematical situations;</p> <p>(6) Interactive instruction and sustained activities designed to enable all students to demonstrate proficiency using the concepts and skills articulated in any grade level expectations that are adopted at the state level; and</p> <p>(7) A developed curriculum incorporating number and operations, geometry and measurement, data, statistic and probability, and functions and algebra consistent with RSA 193-C:3, III.</p> <p>(b) Pursuant to Ed 306.26, the local school board shall require that a mathematics program in each middle school grade provides:</p> <p>(1) Opportunities for all students to solve problems by:</p> <ul style="list-style-type: none"> a. Using multiple strategies; b. Reading and interpreting mathematics; c. Communicating mathematical ideas through speaking and writing; and d. Making connections within and among mathematical ideas and across disciplines; <p>(2) Opportunities for all students to build and construct knowledge and understanding of</p>	<p>(4) Planned activities that promote developing mathematical concepts from the concrete to the representational and finally to the abstract level;</p> <p>(5) Opportunities for all students to develop positive attitudes such as inquisitiveness and appreciation of the multiple ways to approach and solve mathematical situations;</p> <p>(6) Interactive instruction and sustained activities designed to enable all students to demonstrate proficiency using the concepts and skills articulated in any grade level expectations that are adopted at the state level; and</p> <p>(7) A developed curriculum incorporating number and operations, geometry and measurement, data, statistic and probability, and functions and algebra consistent with RSA 193-C:3, III.</p> <p>(b) <i>The school board shall provide a mathematics program at each middle school, consistent with competencies pursuant to Ed 306.26, which may include:</i></p> <p>(1) Opportunities for all students to solve problems by:</p> <ul style="list-style-type: none"> a. Using multiple strategies; b. Reading and interpreting mathematics; c. Communicating mathematical ideas through speaking and writing; and d. Making connections within and among mathematical ideas and across disciplines; 	
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<p>mathematical concepts through developmentally appropriate activities that include concrete experiences and interactions with manipulative, technology, and their environment.</p> <p>(3) Opportunities for authentic tasks that:</p> <p>a. Promote student decision making and questioning; and</p> <p>b. Encourage students to develop unique problem solving strategies while allowing students to defend their strategies and results through inductive and deductive reasoning;</p> <p>(4) Opportunities for all students to explore the historical and cultural development of mathematics;</p> <p>(5) Opportunities for all students to:</p> <p>a. Explore mathematically-related careers; and</p> <p>b. Have direct interaction with the mathematics involved in various careers;</p> <p>(6) Planned activities that promote developing mathematical concepts from the concrete to the representational and finally to the abstract level;</p> <p>(7) Opportunities for all students to develop positive attitudes such as inquisitiveness, appreciation of the multiple ways to approach and solve mathematical situations, and an appreciation of mathematical patterns;</p> <p>(8) Sustained projects and labs that are designed to:</p>	<p>(2) Opportunities for all students to build and construct knowledge and understanding of mathematical concepts through developmentally appropriate activities that include concrete experiences and interactions with manipulative, technology, and their environment;</p> <p>(3) Opportunities for authentic tasks that:</p> <p>a. Promote student decision making and questioning; and</p> <p>b. Encourage students to develop unique problem solving strategies while allowing students to defend their strategies and results through inductive and deductive reasoning;</p> <p>(4) Opportunities for all students to explore the historical and cultural development of mathematics;</p> <p>(5) Opportunities for all students to:</p> <p>a. Explore mathematically-related careers; and</p> <p>b. Have direct interaction with the mathematics involved in various careers;</p> <p>(6) Planned activities that promote developing mathematical concepts from the concrete to the representational and finally to the abstract level;</p> <p>(7) Opportunities for all students to develop positive attitudes such as inquisitiveness, appreciation of the multiple ways to approach and solve mathematical situations, and an appreciation of mathematical patterns;</p> <p>(8) Sustained projects and labs that are designed to:</p>	<p>Will learning levels have unintended consequences?</p>
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<p>a. Incorporate multiple mathematical ideas, research, technology, mathematical communication, and interdisciplinary interaction; and</p> <p>b. Encourage students to solve problems that are meaningful and unique to their lives;</p> <p>(9) Interactive instruction and sustained activities designed to enable all students to demonstrate proficiency using the concepts and skills articulated in any grade level expectations that are adopted at the state level; and</p> <p>(10) A developed curriculum incorporating number and operations, geometry and measurement, data, statistics and probability, and functions and algebra consistent with RSA 193-C:3, III.</p> <p>(c) Pursuant to Ed 306.27, the local school board shall require that a mathematics program in each high school provides:</p> <p>(1) Opportunities for all students to solve problems by:</p> <ul style="list-style-type: none"> a. Using multiple strategies; b. Reading and interpreting mathematics; c. Communicating mathematical ideas through speaking and writing; and d. Making connections within and among mathematical ideas and across disciplines; <p>(2) Opportunities for all students to build and construct knowledge and understanding of mathematical concepts through developmentally appropriate activities that include concrete</p>	<p>a. Incorporate multiple mathematical ideas, research, technology, mathematical communication, and interdisciplinary interaction; and</p> <p>b. Encourage students to solve problems that are meaningful and unique to their lives;</p> <p>(9) Interactive instruction and sustained activities designed to enable all students to demonstrate proficiency using the concepts and skills articulated in any grade level expectations that are adopted at the state level; and</p> <p>(10) A developed curriculum incorporating number and operations, geometry and measurement, data, statistics and probability, and functions and algebra consistent with RSA 193-C:3, III.</p> <p>(c) <i>The school board shall provide a mathematics program at each high school consistent with competencies pursuant to Ed 306.27, which may include:</i></p> <p>(1) Opportunities for all students to solve problems by:</p> <ul style="list-style-type: none"> a. Using multiple strategies; b. Reading and interpreting mathematics; c. Communicating mathematical ideas through speaking and writing; and d. Making connections within and among mathematical ideas and across disciplines; <p>(2) Opportunities for all students to build and construct knowledge and understanding of mathematical concepts through developmentally</p>	
<p>appropriate activities that include concrete</p>	<p>mathematical concepts through developmentally</p>	

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<p>experiences and interactions with manipulatives, technology, and their environment;</p> <p>(3) Opportunities for authentic tasks that:</p> <p>a. Promote student decision making and questioning; and</p> <p>b. Encourage students to develop unique problem-solving strategies while allowing students to defend their strategies and results through inductive and deductive reasoning and proof;</p> <p>(4) Opportunities for all students to explore the historical and cultural development of mathematics;</p> <p>(5) Opportunities for all students to:</p> <p>a. Research mathematically-related careers;</p> <p>b. Have direct interaction with the mathematics involved in various careers; and</p> <p>c. Research the mathematical requirements of various college majors;</p> <p>(6) Planned activities that promote developing mathematical concepts from the concrete to the representational and finally to the abstract level;</p> <p>(7) Opportunities for all students to develop positive attitudes such as inquisitiveness, appreciation of the multiple ways to approach and solve mathematical situations, appreciation of mathematical patterns, and the ability to make predictions from patterns;</p> <p>(8) Sustained projects and labs designed to incorporate multiple mathematical ideas, research, technology, mathematical communication, and</p>	<p>appropriate activities that include concrete experiences and interactions with manipulatives, technology, and their environment;</p> <p>(3) Opportunities for authentic tasks that:</p> <p>a. Promote student decision making and questioning; and</p> <p>b. Encourage students to develop unique problem-solving strategies while allowing students to defend their strategies and results through inductive and deductive reasoning and proof;</p> <p>(4) Opportunities for all students to explore the historical and cultural development of mathematics;</p> <p>(5) Opportunities for all students to:</p> <p>a. Research mathematically-related careers;</p> <p>b. Have direct interaction with the mathematics involved in various careers; and</p> <p>c. Research the mathematical requirements of various college majors;</p> <p>(6) Planned activities that promote developing mathematical concepts from the concrete to the representational and finally to the abstract level;</p> <p>(7) Opportunities for all students to develop positive attitudes such as inquisitiveness, appreciation of the multiple ways to approach and solve mathematical situations, appreciation of mathematical patterns, and the ability to make predictions from patterns;</p> <p>(8) Sustained projects and labs designed to incorporate multiple mathematical ideas, research,</p>	
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<p>interdisciplinary interaction, and to encourage students to solve problems that are meaningful and unique to their lives;</p> <p>(9) Interactive instruction and sustained activities developed to increase mathematical maturity and allow students to be successful in solving problems outside of the classroom;</p> <p>(10) Opportunities for all students to attain competency in mathematics for each year in which he or she is in high school, through graduation, to ensure career and college readiness.</p> <p>(11) Such competency may be met by satisfactorily completing:</p> <p>a. A minimum of 4 courses in mathematics; or</p> <p>b. A minimum of 3 mathematics courses and one non-mathematics content area course in which mathematics knowledge and skills are embedded and applied, as may be approved by the school board.</p> <p>(12) Interactive instruction and sustained activities designed to enable all students to demonstrate proficiency on the state assessment; and</p> <p>(13) A developed curriculum incorporating number and operations, geometry and measurement, data, statistics and probability, and functions and algebra consistent with RSA 193-C:3, III.</p> <p>Ed 306.44 <u>Computer Science Education.</u></p>	<p>technology, mathematical communication, and interdisciplinary interaction, and to encourage students to solve problems that are meaningful and unique to their lives;</p> <p>(9) Interactive instruction and sustained activities developed to increase mathematical maturity and allow students to be successful in solving problems outside of the classroom;</p> <p>(10) Opportunities for all students to attain competency in mathematics for each year in which he or she is in high school, through graduation, to ensure career and college readiness.</p> <p>(11) Such competency may be met by satisfactorily completing:</p> <p>a. A minimum of 4 courses in mathematics; or</p> <p>b. A minimum of 3 mathematics courses and one non-mathematics content area course in which mathematics knowledge and skills are embedded and applied, as may be approved by the school board.</p> <p>(12) Interactive instruction and sustained activities designed to enable all students to demonstrate proficiency on the state assessment; and</p> <p>(13) A developed curriculum incorporating number and operations, geometry and measurement, data, statistics and probability, and functions and algebra consistent with RSA 193-C:3, III.</p> <p>(14) <i>Sound assessment practices consistent with Ed 306.24;</i></p> <p>Ed 306.44 <u>Computer Science Education.</u></p>	
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<p>(a) Each district shall establish and provide a comprehensive, sequentially designed, computer science curriculum, implemented on or before July 1, 2020, that will meet the minimum standards for college and career readiness and that provide for continued growth in all content areas consistent with RSA 193-C:3, III.</p> <p>(b) Pursuant to Ed 306.26, the local school board shall require that a computer science education program for grades 1-8 provides:</p> <p>(1) Integrated, developmentally appropriate instruction in the concepts of computational thinking and the impacts of computing, where students will:</p> <ul style="list-style-type: none"> a. Foster an inclusive computing culture that incorporates personal, ethical, social, economic, and cultural contexts when considering the needs of diverse users of computational products; b. Use collaborative tools and processes to effectively work together to create complex artifacts; c. Recognize and define computational problems; d. Develop and use abstractions to manage complexity; e. Create, test, and refine computational artifacts; and f. Communicate with diverse audiences about the use and effects of computation and the appropriateness of computational choices; and <p>(2) Opportunities for students to build and construct knowledge and understanding of computational</p>	<p>Removed paragraph (a)</p> <p>(a) <i>The school board shall provide a computer science education at each elementary and middle school consistent with competencies pursuant to Ed 306.26, which may include:</i></p> <p>(1) Integrated, developmentally appropriate instruction in the concepts of computational thinking and the impacts of computing, where students will:</p> <ul style="list-style-type: none"> a. Foster an inclusive computing culture that incorporates personal, ethical, social, economic, and cultural contexts when considering the needs of diverse users of computational products; b. Use collaborative tools and processes to effectively work together to create complex artifacts; c. Recognize and define computational problems; d. Develop and use abstractions to manage complexity; e. Create, test, and refine computational artifacts; and f. Communicate with diverse audiences about the use and effects of computation and the appropriateness of computational choices; and <p>(2) Opportunities for students to build and construct knowledge and understanding of computational thinking through developmentally appropriate activities that include concrete experiences and interactions with manipulatives, technology, and their environment.</p> <p>(c) <i>The school board shall provide a computer science education program at each school</i></p>
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<p>thinking through developmentally appropriate activities that include concrete experiences and interactions with manipulatives, technology, and their environment.</p> <p>(c) Pursuant to Ed 306.27, the local school board shall require that a computer science education program be provided in each high school that:</p> <ul style="list-style-type: none"> (1) Offers 2 credits in coursework and competencies in one or more of the following core content areas: <ul style="list-style-type: none"> a. Computing systems; b. Networks and the internet; c. Data and analysis; and d. Algorithms and programming; (2) Provides opportunities for students to build and construct knowledge and understanding of computational thinking through developmentally appropriate activities that include concrete experiences and interactions with manipulatives, technology, and their environment; and (3) Provides opportunities for students to engage in authentic tasks that: <ul style="list-style-type: none"> a. Foster an inclusive computing culture; b. Encourage collaboration; c. Promote the recognition and defining of computational problems; d. Encourage the development and use of abstractions in complex problem solving; 	<p><i>consistent with course competencies pursuant to Ed 306.27, which may include:</i></p> <ul style="list-style-type: none"> (1) Offers 2 credits in coursework and competencies in one or more of the following core content areas: <ul style="list-style-type: none"> a. Computing systems; b. Networks and the internet; c. Data and analysis; and d. Algorithms and programming; (2) Provides opportunities for students to build and construct knowledge and understanding of computational thinking through developmentally appropriate activities that include concrete experiences and interactions with manipulatives, technology, and their environment; and (3) <i>Sound assessment practices consistent with Ed 306.24;</i> 	

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<p>e. Create, test, and refine computational artifacts; and</p> <p>f. Provide opportunities for communication about computing.</p>	<p>Ed 306.45 <u>Science Education Program.</u></p> <p>(a) Pursuant to Ed 306.26, the local school board shall require that a science education program in each elementary school grades, excluding kindergarten, provides:</p> <p>(1) Planned activities designed to:</p> <ol style="list-style-type: none"> Develop students' critical thinking skills; Promote the acquisition of positive attitudes, including, but not limited to, curiosity, initiative, self-reliance, and persistence; and Develop an awareness of and involvement with the natural world; <p>(2) Planned activities designed to increase students' factual knowledge and conceptual understanding of the nature of science, unifying themes of science, and physical, biological, and earth space sciences; and</p> <p>(3) Opportunities for students to develop a knowledge and understanding of process skills such as observing, classifying, measuring, and inferring through activities that allow each student to:</p> <ol style="list-style-type: none"> Explore, collect, handle, sort, and classify natural objects; 	<p>Ed 306.45 <u>Science Education Program.</u></p> <p>(a) <i>The school board shall provide a science education program in each elementary school, excluding Kindergarten, consistent with competencies pursuant to Ed 306.26, which may include:</i></p> <p>(1) Planned activities designed to:</p> <ol style="list-style-type: none"> Develop students' critical thinking skills; Promote the acquisition of positive attitudes, including, but not limited to, curiosity, initiative, self-reliance, and persistence; and Develop an awareness of and involvement with the natural world; <p>(2) Planned activities designed to increase students' factual knowledge and conceptual understanding of the nature of science, unifying themes of science, and physical, biological, and earth space sciences; and</p> <p>(3) Opportunities for students to develop a knowledge and understanding of process skills such as observing, classifying, measuring, and inferring through activities that allow each student to:</p> <ol style="list-style-type: none"> Explore, collect, handle, sort, and classify natural objects; 	<p>Revised language</p>
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<p>b. Use strategies to organize and identify the questions children ask from natural world observations;</p> <p>c. Use tools, including, but not limited to, nonstandard measures, rulers, and magnifiers, to enhance observations and collect represent and interpret data;</p> <p>d. Organize data in multiple ways using tools of technology, including calculators, computers, and handheld electronic devices;</p> <p>e. Communicate through reading, writing, speaking, listening, creating, and viewing to describe their observations of the natural world; and</p> <p>f. Model and communicate safety and health related issues relating to exploration, activities, and inquiry associated with materials, tools, and procedures.</p> <p>(b) Each district shall establish a comprehensive curriculum that meets the needs of the students as described in (a) above and helps students progress as provided in RSA 193-C:3, III.</p>	<p>b. Use strategies to organize and identify the questions children ask from natural world observations;</p> <p>c. Use tools, including, but not limited to, nonstandard measures, rulers, and magnifiers, to enhance observations and collect represent and interpret data;</p> <p>d. Organize data in multiple ways using tools of technology, including calculators, computers, and handheld electronic devices;</p> <p>e. Communicate through reading, writing, speaking, listening, creating, and viewing to describe their observations of the natural world; and</p> <p>f. Model and communicate safety and health related issues relating to exploration, activities, and inquiry associated with materials, tools, and procedures.</p> <p>(b) Each district shall establish a comprehensive curriculum that meets the needs of the students as described in (a) above and helps students progress as provided in RSA 193-C:3, III.</p>	
<p>(c) Pursuant to Ed 306.26, the local school board shall require that a science program in each middle school provides:</p> <p>(1) Planned activities in grades 5-8 designed to increase students' factual knowledge and conceptual understanding of the nature of science, unifying themes of science, and physical, biological, and earth space sciences;</p> <p>(2) Instruction in grades 6 to 8 which provides a semester of yearlong and content connected</p>	<p>(c) The school board shall provide a science education program in each middle school consistent with competencies pursuant to Ed 306.26, which may include:</p> <p>(1) Planned activities in grades 5-8 designed to increase students' factual knowledge and conceptual understanding of the nature of science, unifying themes of science, and physical, biological, and earth space sciences;</p> <p>(2) Instruction in grades 6 to 8 which provides a semester of yearlong and content connected</p>	<p>Grade levels or learning levels?</p> <p>Grade levels or learning levels?</p>

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<p>experiences in biology life science, physical science, and earth space science;</p> <p>(3) Opportunities for students to develop a knowledge and understanding of process skills such as observing, classifying, measuring, graphing, inferring, experimenting, and communicating; and</p> <p>(4) Systematic instruction, laboratory experiences and activities designed to enable students to:</p> <p>a. Gather scientific data through laboratory and field work;</p> <p>b. Employ safe practices and techniques in the laboratory and on field trips;</p> <p>c. Apply scientific concepts and skills in solving real problems and in everyday situations;</p> <p>d. Understand the impact of science and technology on daily life;</p> <p>e. Be aware of science-related societal issues;</p> <p>f. Investigate the natural world and acquire an understanding of scientific explanations of natural phenomena;</p> <p>g. Acquire an understanding of the history of science and its impact on society and the realization that science is a human endeavor;</p> <p>h. Become familiar with science and technology related careers;</p> <p>i. Engage in full and partial inquiries;</p>	<p>experiences in biology life science, physical science, and earth space science;</p> <p>(3) Opportunities for students to develop a knowledge and understanding of process skills such as observing, classifying, measuring, graphing, inferring, experimenting, and communicating; and</p> <p>(4) Systematic instruction, laboratory experiences and activities designed to enable students to:</p> <p>a. Gather scientific data through laboratory and field work;</p> <p>b. Employ safe practices and techniques in the laboratory and on field trips;</p> <p>c. Apply scientific concepts and skills in solving real problems and in everyday situations;</p> <p>d. Understand the impact of science and technology on daily life;</p> <p>e. Be aware of science-related societal issues;</p> <p>f. Investigate the natural world and acquire an understanding of scientific explanations of natural phenomena;</p> <p>g. Acquire an understanding of the history of science and its impact on society and the realization that science is a human endeavor;</p> <p>h. Become familiar with science and technology related careers;</p> <p>i. Engage in full and partial inquiries;</p>	
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<p>j. Use their understanding of background content and theories to guide their design of observations and investigations;</p> <p>k. Shape and modify their background knowledge through experiments and observations;</p> <p>l. Develop their abilities in systematic observation, making accurate measurements, and identifying and controlling variables; and</p> <p>m. Express their understanding through the use of writing, labeling drawings, completing concept maps, developing spreadsheets and creative representations, and designing computer images and representations.</p> <p>(d) Each district shall establish a comprehensive curriculum that provides for continued growth in all content areas consistent with RSA 193-C:3, III.</p> <p>(e) Pursuant to Ed 306.27, the local school board shall require that a science program in each high school provides:</p> <p>(1) Opportunities for students to become familiar with the impact, limitations, fundamental principles, and methods of science;</p> <p>(2) Opportunities for students to acquire knowledge of the natural world through the application of logical thought processes such as observation, hypothesizing, experimentation, and the drawing of conclusions;</p> <p>(3) Opportunities for students to develop a knowledge and understanding of attitudes and problem-solving techniques essential for life in an increasingly complex technological society;</p>	<p>j. Use their understanding of background content and theories to guide their design of observations and investigations;</p> <p>k. Shape and modify their background knowledge through experiments and observations;</p> <p>l. Develop their abilities in systematic observation, making accurate measurements, and identifying and controlling variables; and</p> <p>m. Express their understanding through the use of writing, labeling drawings, completing concept maps, developing spreadsheets and creative representations, and designing computer images and representations.</p> <p>(d) Each district shall establish a comprehensive curriculum that provides for continued growth in all content areas consistent with RSA 193-C:3, III.</p> <p>(e) <i>The school board shall provide a science education program at each high school consistent with competencies pursuant to Ed 306.27, which may include:</i></p> <p>(1) Opportunities for students to become familiar with the impact, limitations, fundamental principles, and methods of science;</p> <p>(2) Opportunities for students to acquire knowledge of the natural world through the application of logical thought processes such as observation, hypothesizing, experimentation, and the drawing of conclusions;</p> <p>(3) Opportunities for students to develop a knowledge and understanding of attitudes and</p>	

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<p>(4) Courses totaling at least 5 credits in science comprised of offerings in each of the following areas:</p> <ol style="list-style-type: none"> a. Physical science which shall include: <ol style="list-style-type: none"> 1. Conservation of matter; 2. Conservation of energy, matter and energy in nuclear phenomena; 3. Newton's Laws involving the structure and interaction of matter and energy; 4. Chemical principles, including the ability to distinguish among materials by utilizing observable properties; and 5. Physical principles, including the application of knowledge of forces and motion to all types of motion in the universe; b. Biology which shall include: <ol style="list-style-type: none"> 1. Molecular and cellular biology; 2. Genetics; 3. Plant and animal diversity and the structure and function of plants and animals; 4. The principles of classification, including fundamental structures, functions, and mechanisms of inheritance found in the major grouping of organisms including bacteria, fungi, protists, plants, and animals; 5. Population biology; 	<p>problem-solving techniques essential for life in an increasingly complex technological society;</p> <p>(4) Courses totaling at least 5 credits in science comprised of offerings in each of the following areas:</p> <ol style="list-style-type: none"> a. Physical science b. Biology c. Chemistry d. Physics e. Earth space science <p>(5) Systematic instruction, fieldwork, experimentation and activities designed to enable students to:</p> <ol style="list-style-type: none"> a. Know about the diversity of natural phenomena and the methods of studying and classifying them; b. Recognize the interrelationship and interdependence of living organisms and the role of a biological organism in a physical world; c. Understand the scientific method of investigation, including the role of observation and experimentation in the advancement of scientific knowledge; d. Gather scientific data through laboratory and field work; e. Construct tables and graphs from given data and interpret data presented in tables and graphs; f. Draw conclusions and inferences from data. 	
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<p>6. Organic evolution and patterns and products of evolution, including genetic variation, specialization, adaptation, and natural selection;</p> <p>7. Ecology and animal behavior and how environmental factors affect all living systems, including individuals, communities, biomes, and the biosphere, as well as species to species interactions; and</p> <p>8. The concept that organisms are linked to one another and to their physical setting by the transfer and transformation of matter and energy to maintain a dynamic equilibrium;</p> <p>c. Chemistry which shall include:</p> <ol style="list-style-type: none"> 1. Structure of matter; 2. States of matter; 3. Chemical classification; 4. Introductory organic chemistry; 5. Reactions of matter such as acids, bases, oxidation-reduction, electrochemistry, equilibrium, kinetics; and 6. Thermodynamics; <p>d. Physics which shall include:</p> <ol style="list-style-type: none"> 1. Principles of mechanics; 2. Laws of conservation; 3. Basics of waves; 4. Fundamentals of electricity and magnetism; and 	<p>g. Apply scientific concepts and skills in solving real problems and in everyday situations;</p> <p>h. Communicate observations and experimental results both quantitatively, through the use of mathematical relationships, and qualitatively, in clear and concise spoken or written language;</p> <p>i. Appreciate the unifying concepts and principles within the natural sciences;</p> <p>j. Be aware of the philosophical, ethical, legal, political, and economic impacts of science and technology;</p> <p>k. Acquire an understanding of the history of science and the realization that science is a human endeavor; and</p> <p>l. Be aware of concerns about the current and future impacts of science and technology on society and the environment.</p> <p>(f) Science courses in high schools shall teach the fundamentals of science and incorporate all of the content-specific components listed in (e) above and as many of the other non-course frameworks and concepts, including, but not limited to, science as inquiry/science and technology and society/unifying themes, as are appropriate</p> <p>(g) High school science courses shall be designed to prepare students for meeting or exceeding the end of grade 10 proficiencies in science consistent with RSA 193-C:3, III, regardless of the grade in which the course occurs.</p>
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<p>5. Atomic and nuclear physics:</p> <p>e. Earth space science which shall include the concepts that the earth:</p> <p>1. Is a unique member of our solar system, located in a galaxy, within the universe;</p> <p>2. Is a complex planet with 5 interacting systems, namely:</p> <p>(i) Solid earth or lithosphere;</p> <p>(ii) Air or atmosphere;</p> <p>(iii) Water or hydrosphere;</p> <p>(iv) Ice or cryosphere; and</p> <p>(v) Life or biosphere; and</p> <p>3. Contains a variety of renewable and nonrenewable resources; and</p> <p>f. General or advanced science which shall include subject matter appropriate to the disciplines listed in e. above; and</p> <p>(5) Systematic ^{instruction.} fieldwork, experimentation and activities designed to enable students to:</p> <p>a. Know about the diversity of natural phenomena and the methods of studying and classifying them;</p> <p>b. Recognize the interrelationship and interdependence of living organisms and the role of a biological organism in a physical world;</p>			
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<p>c. Understand the scientific method of investigation, including the role of observation and experimentation in the advancement of scientific knowledge;</p> <p>d. Gather scientific data through laboratory and field work;</p> <p>e. Construct tables and graphs from given data and interpret data presented in tables and graphs;</p> <p>f. Draw conclusions and inferences from data;</p> <p>g. Apply scientific concepts and skills in solving real problems and in everyday situations;</p> <p>h. Communicate observations and experimental results both quantitatively, through the use of mathematical relationships, and qualitatively, in clear and concise spoken or written language;</p> <p>i. Appreciate the unifying concepts and principles within the natural sciences;</p> <p>j. Be aware of the philosophical, ethical, legal, political, and economic impacts of science and technology;</p> <p>k. Acquire an understanding of the history of science and the realization that science is a human endeavor; and</p> <p>l. Be aware of concerns about the current and future impacts of science and technology on society and the environment.</p> <p>(f) Science courses in high schools shall teach the fundamentals of science and incorporate all of the content-specific components listed in (e) above and</p>		
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<p>as many of the other non-course frameworks and concepts, including, but not limited to, science as inquiry/science and technology and society/unifying themes, as are appropriate.</p> <p>(g) High school science courses shall be designed to prepare students for meeting or exceeding the end of grade 10 proficiencies in science consistent with RSA 193-C:3, III, regardless of the grade in which the course occurs.</p>			
<p>Ed 306.46 <u>Social Studies Program</u></p> <p>(a) Pursuant to Ed 306.26, the local school board shall require that a social studies program in each elementary school grade, excluding kindergarten, and excepting Holocaust and genocide education, as applicable pursuant to Ed 306.26(h) which is to be implemented no later than 8th grade, provides:</p> <p>(1) Opportunities for students to:</p> <p>a. Acquire knowledge and understanding of civics, economics, geography, history, and Holocaust and genocide education, as applicable pursuant to Ed 306.26(h), in a program consistent with the requirements under RSA 193-C:3, III; and</p> <p>b. Become familiar with the skills of decision making, data gathering, and critical thinking:</p> <p>(2) Pursuant to RSA 186:13, opportunities to practice citizenship in the school and community;</p> <p>(3) Pursuant to RSA 189:11, instruction in history and government and the constitutions of the United States and New Hampshire; and</p> <p>(4) Opportunities for students to acquire the knowledge, skills, and attitudes necessary for</p>	<p>Ed 306.46 <u>Social Studies Program</u>.</p> <p>(a) <i>The school board shall provide a social studies program in each elementary school consistent with competencies pursuant to Ed 306.26, excluding kindergarten, and excepting Holocaust and genocide education, as applicable pursuant to Ed 306.26(h) which is to be implemented no later than 8th grade, provides, which may include:</i></p> <p>(1) Opportunities for students to:</p> <p>a. Acquire knowledge and understanding of civics, economics, geography, history, and Holocaust and genocide education, as applicable pursuant to Ed 306.26(h), in a program consistent with the requirements under RSA 193-C:3, III; and</p> <p>b. Become familiar with the skills of decision making, data gathering, and critical thinking:</p> <p>(2) Pursuant to RSA 186:13, opportunities to practice citizenship in the school and community;</p> <p>(3) Pursuant to RSA 189:11, instruction in history and government and the constitutions of the United States and New Hampshire; and</p>	<p>Revised language</p>	

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<p>effective participation in the life of the community, the state, the nation, and the world.</p> <p>(b) Pursuant to Ed 306.26, the local school board shall require that a social studies program in each middle school provides:</p> <p>(1) Opportunities for students to acquire knowledge and understanding of civics, economics, geography, history, and Holocaust and genocide education, as applicable pursuant to Ed 306.26(h), in a program consistent with RSA 193-C:3, III;</p> <p>(2) Pursuant to RSA 186:13, opportunities to practice citizenship in the school and community;</p> <p>(3) Pursuant to RSA 189:11, instruction in history and government and the constitutions of the United States and New Hampshire; and</p> <p>(4) Systematic instruction and activities designed to enable students to:</p> <p>a. Acquire and use information to clarify issues and seek solutions to societal problems;</p> <p>b. Value and apply critical thinking, interpersonal relations, and decision-making skills in both individual and group problem-solving situations;</p> <p>c. Participate in and contribute to the well-being of the home and school as well as the larger communities of the state, nation, and world; and</p> <p>d. Become familiar with careers in history, the humanities, and the social sciences.</p>	<p>(4) Opportunities for students to acquire the knowledge, skills, and attitudes necessary for effective participation in the life of the community, the state, the nation, and the world.</p> <p>(b) <i>The school board shall provide a social studies education program in each middle school consistent with competencies pursuant to Ed 306.26, which may include:</i></p> <p>(1) Opportunities for students to acquire knowledge and understanding of civics, economics, geography, history, and Holocaust and genocide education, as applicable pursuant to Ed 306.26(h), in a program consistent with RSA 193-C:3, III;</p> <p>(2) Pursuant to RSA 186:13, opportunities to practice citizenship in the school and community;</p> <p>(3) Pursuant to RSA 189:11, instruction in history and government and the constitutions of the United States and New Hampshire; and</p> <p>(4) Systematic instruction and activities designed to enable students to:</p> <p>a. Acquire and use information to clarify issues and seek solutions to societal problems;</p> <p>b. Value and apply critical thinking, interpersonal relations, and decision-making skills in both individual and group problem-solving situations;</p> <p>c. Participate in and contribute to the well-being of the home and school as well as the larger communities of the state, nation, and world; and</p> <p>d. Become familiar with careers in history, the humanities, and the social sciences.</p>	

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<p>(c) Pursuant to Ed 306.27, the local school board shall require that a social studies program in each high school provides:</p> <p>(1) Opportunities for students to acquire knowledge and modes of inquiry in the areas of civics, economics, geography, world history, United States and New Hampshire history, and Holocaust and genocide education pursuant to Ed 306.27(ai), in a program consistent with RSA 193-C:3, III, including the related areas of sociology, anthropology, and psychology;</p> <p>(2) Opportunities for students to acquire the knowledge, skills, and attitudes necessary for effective participation in the life of the community, the state, the nation, and the world;</p> <p>(3) Pursuant to RSA 186:13, opportunities to practice citizenship in the school and community;</p> <p>(4) Courses totaling at least 5 credits in social studies comprised of offerings in each of the following areas:</p> <p>a. At least one credit in national and state history pursuant to RSA 189:11;</p> <p>b. At least one credit in world history or global studies;</p> <p>c. At least one credit in geography;</p> <p>d. At least ½ credit in United States and New Hampshire government/civics;</p> <p>e. At least ½ credit in economics; and</p>	<p>(c) <i>The school board shall provide a social studies education program in each high school consistent with course competencies pursuant to Ed 306.27, which may include:</i></p> <p>(1) Opportunities for students to acquire knowledge and modes of inquiry in the areas of civics, economics, geography, world history, United States and New Hampshire history, and Holocaust and genocide education pursuant to Ed 306.27(ai), in a program consistent with RSA 193-C:3, III, including the related areas of sociology, anthropology, and psychology;</p> <p>(2) Opportunities for students to acquire the knowledge, skills, and attitudes necessary for effective participation in the life of the community, the state, the nation, and the world;</p> <p>(3) Pursuant to RSA 186:13, opportunities to practice citizenship in the school and community;</p> <p>(4) Courses totaling at least 5 credits in social studies comprised of offerings in each of the following areas:</p> <p>a. At least one credit in national and state history pursuant to RSA 189:11;</p> <p>b. At least one credit in world history or global studies;</p> <p>c. At least one credit in geography;</p> <p>d. At least ½ credit in United States and New Hampshire government/civics;</p> <p>e. At least ½ credit in economics; and</p>	
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<p>f. At least one credit, which may be interdisciplinary or integrated, to be chosen from the areas of geography, economics, world history, civics/government, state or national history or both, or behavioral studies; and</p> <p>(5) Systematic instruction and activities designed to enable students to acquire the skills of critical thinking, effective decision making, and human relations.</p>	<p>f. At least one credit, which may be interdisciplinary or integrated, to be chosen from the areas of geography, economics, world history, civics/government, state or national history or both, or behavioral studies; and</p> <p>(5) Systematic instruction and activities designed to enable students to acquire the skills of critical thinking, effective decision making, and human relations.</p>	
<p><u>Ed 306.47 Technology/Engineering Education Program.</u></p> <p>(a) Technology/engineering education is the discipline devoted to the study of human invention and innovation and their influence on our natural and human-made environment.</p> <p>(b) The local school board shall require that a technology/engineering education program in each middle school provides:</p> <p>(1) Opportunities for students to develop an understanding of the technological world in which they live and will someday work;</p> <p>(2) Opportunities for students to develop positive attitudes and knowledge about present and future technologies in 3 or more of the following content areas:</p> <p>a. Medical technologies;</p> <p>b. Agricultural;</p>	<p><i>(d) Sound assessment practices consistent with Ed 306.24;</i></p> <p><u>Ed 306.47 Technology/Engineering Education Program.</u></p> <p>(b) The school board shall provide a technology/engineering education program in each middle school consistent with competencies pursuant to Ed 3056.26, which may include:</p> <p>(1) Opportunities for students to develop an understanding of the technological world in which they live and will someday work;</p> <p>(2) Opportunities for students to develop positive attitudes and knowledge about present and future technologies in 3 or more of the following content areas:</p> <p>a. Medical technologies;</p> <p>b. Agricultural;</p> <p>c. Biotechnologies;</p> <p>d. Energy and power technologies;</p>	<p>Revised language</p>

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<p>e. Biotechnologies;</p> <p>d. Energy and power technologies;</p> <p>e. Information and communications technologies;</p> <p>f. Transportation technologies;</p> <p>g. Manufacturing technologies;</p> <p>h. Construction technologies; and</p> <p>i. New and emerging technologies;</p> <p>(3) Opportunities for students to develop a knowledge and understanding of how social forces like demographics and prevailing economic systems can influence the free-enterprise system and the global marketplace;</p> <p>(4) Opportunities to promote the development of problem-solving skills as well as basic skills in planning, design, fabrication, and evaluating technical processes technology/engineering principles and design, encouraging those habits of mind necessary to be a lifelong learner; and</p> <p>(5) Systematic instruction and activities designed to enable students to:</p> <p>a. Acquire an understanding of technical processes, the practical application of mathematics and scientific principles, and the interrelationships between technology/engineering education and other academic disciplines in the school curriculum;</p> <p>b. Be aware of the right to, and the knowledge of what constitutes, safe work environments as well as</p>	<p>e. Information and communications technologies;</p> <p>f. Transportation technologies;</p> <p>g. Manufacturing technologies;</p> <p>h. Construction technologies; and</p> <p>i. New and emerging technologies;</p> <p>(3) Opportunities for students to develop a knowledge and understanding of how social forces like demographics and prevailing economic systems can influence the free-enterprise system and the global marketplace;</p> <p>(4) Opportunities to promote the development of problem-solving skills as well as basic skills in planning, design, fabrication, and evaluating technical processes technology/engineering principles and design, encouraging those habits of mind necessary to be a lifelong learner; and</p> <p>(5) Systematic instruction and activities designed to enable students to:</p> <p>a. Acquire an understanding of technical processes, the practical application of mathematics and scientific principles, and the interrelationships between technology/engineering education and other academic disciplines in the school curriculum;</p> <p>b. Be aware of the right to, and the knowledge of what constitutes, safe work environments as well as the safe and appropriate use of tools, small machines, and processes;</p> <p>c. Understand industry and technology, their systematic structures, and their place in our culture;</p>	
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<p>the safe and appropriate use of tools, small machines, and processes;</p> <p>c. Understand industry and technology, their systematic structures, and their place in our culture;</p> <p>d. Understand the technological systems model requiring inputs, processes, outputs and feedback, where the processes include the resources of people, information, tools, energy, capital, time, materials;</p> <p>e. Learn leadership and group-process skills;</p> <p>f. Recognize and build upon individual talents and interests; and</p> <p>g. Become familiar with opportunities and requirements for careers in new and emerging technologies like medicine, agriculture, biotechnology, energy and power, information and communications, transportation, manufacturing, and construction.</p>	<p>d. Understand the technological systems model requiring inputs, processes, outputs and feedback, where the processes include the resources of people, information, tools, energy, capital, time, materials;</p> <p>e. Learn leadership and group-process skills;</p> <p>f. Recognize and build upon individual talents and interests; and</p> <p>g. Become familiar with opportunities and requirements for careers in new and emerging technologies like medicine, agriculture, biotechnology, energy and power, information and communications, transportation, manufacturing, and construction.</p>	
<p>(c) The local school board shall require that a technology/engineering education program in each high school provides:</p> <p>(1) Opportunities for students to develop insight, understanding, and application of technological concepts, processes, and systems;</p> <p>(2) Opportunities for students to develop safe and efficient habits in the application of tools, materials, machines, processes, and technical concepts;</p> <p>(3) Planned activities designed to increase students' knowledge and skills related to technologies like medicine, agriculture, biotechnology, energy and</p>	<p>(c) The school board shall provide a technology/engineering education program in each high school consistent with course competencies pursuant to Ed 306.27, which may include:</p> <p>(1) Opportunities for students to develop insight, understanding, and application of technological concepts, processes, and systems;</p> <p>(2) Opportunities for students to develop safe and efficient habits in the application of tools, materials, machines, processes, and technical concepts;</p> <p>(3) Planned activities designed to increase students' knowledge and skills related to technologies like medicine, agriculture, biotechnology, energy and power, information and communications, transportation, manufacturing, and construction;</p>	

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<p>power, information and communications, transportation, manufacturing, and construction;</p> <p>(4) Courses totaling at least 4 credits in technology/engineering education with a minimum of one credit offered in 3 of the 4 areas of:</p> <ul style="list-style-type: none"> a. Energy and power technologies, including electricity, electronics, power mechanics, transportation, alternative energy, and energy conservation; b. Process technologies, including manufacturing, construction, wood, metal, medical, agricultural, and biotechnology; c. Communication and information technologies, including engineering graphics/CAD fundamentals, architectural design including modeling and the virtual environment, photography, printing, desktop publishing, graphic arts and design; and d. Engineering principles and design; and <p>(5) Systematic instruction and activities designed to enable students to:</p> <ul style="list-style-type: none"> a. Understand the factors of production, including capital, labor, and management, in relation to industrial organization, systems and structure; b. Utilize the engineering design process to propose, build, test and assess technological problems in a systematic and economically sound manner; c. Develop skills in specific machine and tool operations; 	<p>(4) Courses totaling at least 4 credits in technology/engineering education with a minimum of one credit offered in 3 of the 4 areas of:</p> <ul style="list-style-type: none"> a. Energy and power technologies, including electricity, electronics, power mechanics, transportation, alternative energy, and energy conservation; b. Process technologies, including manufacturing, construction, wood, metal, medical, agricultural, and biotechnology; c. Communication and information technologies, including engineering graphics/CAD fundamentals, architectural design including modeling and the virtual environment, photography, printing, desktop publishing, graphic arts and design; and d. Engineering principles and design; and <p>(5) Systematic instruction and activities designed to enable students to:</p> <ul style="list-style-type: none"> a. Understand the factors of production, including capital, labor, and management, in relation to industrial organization, systems and structure; b. Utilize the engineering design process to propose, build, test and assess technological problems in a systematic and economically sound manner; c. Develop skills in specific machine and tool operations; d. Plan, design, produce and/or use measuring instruments, jigs, fixtures, and templates to control, test and assess parts of a technological process;
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<p>d. Plan, design, produce and/or use measuring instruments, jigs, fixtures, and templates to control, test and assess parts of a technological process;</p> <p>e. Use a variety of problem-solving tools to develop and apply critical thinking skills to technological problems;</p> <p>f. Exhibit an understanding for the importance of using resources in a way that is economical, efficient and respectful of our shared environment;</p> <p>g. Develop those habits of mind necessary to a lifelong learner such as the ability to question, investigate, design, experiment, and evaluate; and</p> <p>h. Develop leadership abilities required in a technological society such as communication, cooperation, and collaboration with individuals and groups.</p> <p>Ed 306.48 <u>World Languages Program.</u></p> <p>(a) The local school board may provide instruction in one or more world languages in an elementary school. The extent of this instruction and the students to whom it is offered shall be determined by local school board policy.</p> <p>(b) Pursuant to Ed 306.26 the local school board may provide supplemental instruction in one or more world languages in a middle school.</p> <p>(c) If world language instruction is offered, the program shall be designed to provide:</p> <p>(1) Opportunities for students to develop a basic proficiency in a second language or to explore 2 or more languages other than English;</p>	<p>e. Use a variety of problem-solving tools to develop and apply critical thinking skills to technological problems;</p> <p>f. Exhibit an understanding for the importance of using resources in a way that is economical, efficient and respectful of our shared environment;</p> <p>g. Develop those habits of mind necessary to a lifelong learner such as the ability to question, investigate, design, experiment, and evaluate; and</p> <p>h. Develop leadership abilities required in a technological society such as communication, cooperation, and collaboration with individuals and groups.</p> <p>(d) <i>Sound assessment practices consistent with Ed 306.24;</i></p> <p>Ed 306.48 <u>World Languages Program.</u></p> <p>(a) The local school board may provide instruction in one or more world languages in an elementary school. The extent of this instruction and the students to whom it is offered shall be determined by local school board policy.</p> <p>(b) Pursuant to Ed 306.26 the local school board may provide supplemental instruction in one or more world languages in a middle school.</p> <p>(c) If world language instruction is offered, the program shall be designed to provide:</p> <p>(1) Opportunities for students to develop a basic proficiency in a second language or to explore 2 or more languages other than English;</p>	
		<p>Revised language</p> <p>Added paragraph (g)</p>

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<p>(2) Instruction which emphasizes basic competency in the 4 skills of listening comprehension, reading, speaking, and writing;</p> <p>(3) Activities designed to make students aware of the culture of the countries in which the language(s) is/are spoken; and</p> <p>(4) Systematic instruction and activities designed to enable students to:</p> <p>a. Gain basic linguistic knowledge in one or more second language(s);</p> <p>b. Acquire basic communicative competence by applying the skills of listening comprehension, speaking, reading, and writing;</p> <p>c. Understand the contributions of other cultures and compare elements of those cultures with American culture;</p> <p>d. Recognize and respect linguistic and cultural differences and be enriched by other societies' contributions to the human experience;</p> <p>e. Be aware of the concept of global interdependence; and</p> <p>f. Become familiar with the relationship between second language skills and future career choices.</p> <p>(d) Pursuant to Ed 306.27, the local school board shall require that a world language program in each high school provides:</p> <p>(1) Opportunities for students to become familiar with the linguistic and cultural elements of classical and/or modern languages;</p>	<p>(2) Instruction which emphasizes basic competency in the 4 skills of listening comprehension, reading, speaking, and writing;</p> <p>(3) Activities designed to make students aware of the culture of the countries in which the language(s) is/are spoken; and</p> <p>(4) Systematic instruction and activities designed to enable students to:</p> <p>a. Gain basic linguistic knowledge in one or more second language(s);</p> <p>b. Acquire basic communicative competence by applying the skills of listening comprehension, speaking, reading, and writing;</p> <p>c. Understand the contributions of other cultures and compare elements of those cultures with American culture;</p> <p>d. Recognize and respect linguistic and cultural differences and be enriched by other societies' contributions to the human experience;</p> <p>e. Be aware of the concept of global interdependence; and</p> <p>f. Become familiar with the relationship between second language skills and future career choices.</p> <p>(d) <i>The school board shall provide a world language education program in each high school consistent with course competencies pursuant to Ed 306.27, which may include:</i></p>	
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<p>(2) Opportunities for students to develop a knowledge and understanding of the skills necessary for effective communication in the language(s) studied as well as an understanding of the nature and contributions of the related culture(s); and</p> <p>(3) Systematic instruction and activities designed to enable students to:</p> <p>a. Acquire progressive proficiency in the skills of listening comprehension, speaking, reading, writing and structural analysis;</p> <p>b. Increase knowledge and understanding of the countries, cultures, and attitudes of the peoples whose languages are being studied;</p> <p>c. Appreciate one's own cultural heritage;</p> <p>d. Plan education and career development in areas related to world languages; and</p> <p>e. Develop career and technical interests and activities associated with the study and use of world languages.</p> <p>(c) Each high school shall offer courses totaling 5 credits comprised of a 3-year sequence in one world language and a 2-year sequence in a second world language.</p> <p>(f) American Sign Language (ASL) shall qualify as a world language for purposes of this section and for the purpose of meeting a high school world language graduation requirement.</p>	<p>(1) Opportunities for students to become familiar with the linguistic and cultural elements of classical and/or modern languages;</p> <p>(2) Opportunities for students to develop a knowledge and understanding of the skills necessary for effective communication in the language(s) studied as well as an understanding of the nature and contributions of the related culture(s); and</p> <p>(3) Systematic instruction and activities designed to enable students to:</p> <p>a. Acquire progressive proficiency in the skills of listening comprehension, speaking, reading, writing and structural analysis;</p> <p>b. Increase knowledge and understanding of the countries, cultures, and attitudes of the peoples whose languages are being studied;</p> <p>c. Appreciate one's own cultural heritage;</p> <p>d. Plan education and career development in areas related to world languages; and</p> <p>e. Develop career and technical interests and activities associated with the study and use of world languages.</p> <p>(e) Each high school shall offer courses totaling 5 credits comprised of a 3-year sequence in one world language and a 2-year sequence in a second world language.</p> <p>(f) American Sign Language (ASL) shall qualify as a world language for purposes of this section and for</p>
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	the purpose of meeting a high school world language graduation requirement. <i>(g) Sound assessment practices consistent with Ed 306.24;</i>	
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Date	Time	Location	Attendee	Questions that need further explanation on the proposed changes (list all questions you may have)	Concerns with the proposed changes (list all concerns you may have)	Support of the proposed changes (please select what best describes your level of support)	Are there any additional comments you would like to have included?
4/14/2023	9:56:41	Marlborough	Public School Staff Member	Could you please let us know what the significant changes are? I looked through the draft you attached, but I do not know what to compare that to; could you summarize what the significant changes are?	I don't know as I do not know what the significant changes are	I need additional information before I can support the proposed changes.	Could my question be asked before the public forum?
4/15/2023	15:33:1	Marlborough	Administrator	1) Why does the minimum standards require school counselors to follow the ASCA model, yet they promote a counselor to student ratio of 1:500, whereas it's 1:250 according to ASCA. That is contradictory. 2) School districts must already address special physical needs of student, but they added that district must also meet "special emotional needs." Will their be added resources to address this?	1) Why does the minimum standards require school counselors to follow the ASCA model, yet they promote a counselor to student ratio of 1:500, whereas it's 1:250 according to ASCA. That is contradictory. 2) School districts must already address special physical needs of student, but they added that district must also meet "special emotional needs." Will their be added resources to address this?	I need additional information before I can support the proposed changes.	It was a long document to digest, but it's important work so that is not a criticism
4/12/2023	9:54:1	Marlborough	Parent	What is this going to affect in the curriculum that is provided currently as so far this year I feel our school is already very behind	I don't understand what these changes entail please describe these in more detail.	I fully support the proposed changes as presented.	I fully support the proposed changes as presented.
4/12/2023	11:10	Marlborough	Parent	I have no idea after reading all that into what exactly that are changing that everyone thinks is bad and if there is something bad I want to be made aware of it. I'd like a laymans term description of what is what without all the technical stuff. I am a smart lady but I like to just hear the facts without the extra stuff.		I need additional information before I can support the proposed changes.	Please simplify what this change will mean for those of us who have no idea
4/12/2023	14:55	Marlborough	Parent, Taxpayer			I fully support the proposed changes as presented.	
4/12/2023	15:07	Marlborough	Parent, Taxpayer			I need additional information before I can support the proposed changes.	
5/8/2023	10:24:1	Marlborough	Taxpayer			I do not support the proposed changes at all.	
5/8/2023	13:07:1	Marlborough	Parent	It says meeting the instructional needs of each individual student is to be removed. The other section being removed also seemingly relevant to the previous section stated before this, meeting the instructional needs of students requirements for administrators based on talents, interests and needs when planning educational programs	Does this mean there will no longer be IEP's? Does this mean that the style/manner in which each teacher educates and instructs will be of a certain way, that won't allow for variation when needed for students with different education needs but don't qualify for an IEP? Are we no longer going to take into account the varying needs, interests, and talents of students? Are we watering down minimum standards that are already so minimum that we are not graduating students with competencies required in future academics, careers and lives? Do we want minimum standards that are easy to meet, or minimum standards that will deliver on the mission of education?	I need additional information before I can support the proposed changes.	There seems to be some good changes, but also some not so great changes here as well, but further clarification may help.
5/8/2023	15:58:1	Marlborough	School Board Member			I need additional information before I can support the proposed changes.	

Timestamp	I am a (check all that apply)	I reside in (enter level of jurisdiction)	Questions that need further explanation on the proposed changes (list all questions you may have)	Concerns with the proposed changes (list all concerns you may have)	Support of the proposed changes (please select what best describes your level of support)	Are there any additional comments you would like to have included?
5/8/2023 16:51	Public School Staff Member	Westmoreland, NH	How does the personal learning plan impact the IEP a student may be on? How many public school teachers were on the team that developed these changes?	How do we fit personal learning plan prepping/maintaining into our daily schedule? Details are needed on the portfolio requirement. Plus, what is the purpose and who will ever look at it?	I do not support the proposed changes at all	NH just passed a law stating that multiplication is a required skill in elementary school (along with cursive). How are we supposed to respect changes when the commission of ed doesn't realize that multiplication is already a standard? My student is an honor student who works very hard for her grades. I would hate to see all that hard work dumbed down for other kids abilities. We can not afford private school but I worry she will not get her best education with the proposed changes. It feels like they are pushing for kids like her to go to private schools but that isn't fair. We pay taxes and she should be guaranteed the best education that schools can provide. This feels like they are trying to provide less and less
5/8/2023 22:09	Parent, Public School Staff Member, Taxpayer	Westmoreland	Changing from "mastery" to "achieved". What about our honor students? Doesn't this make it so all their hard work isn't recognized?	Changing "mastered" to "achieved". Making it so that the grading isn't accurate for the work and effort put in The changing public schools to have more learning in other environments. What does this do for our honor students? Do they still get the recognition and credit they work hard for? Not having standards set for each class. Not giving teachers the ability to grade on their own. Why is the language changed to "learning opportunities" instead of courses?	I do not support the proposed changes at all	
5/10/2023 19:35	Parent	Chesterfield	What is reimagine education through the lens of unbundling? Pods? Micro schools? Part time public school enrollment? Comprehensive discussion and more specifics of what this will look like is needed.	Reverts away from the fundamentals of education and standardized assessments. Impacts our children's ability to develop necessary life skills to cope, problem solve, make life decisions	I do not support the proposed changes at all	
5/11/2023 11:50	Taxpayer	Keene	Vague Language	removal of certification requirements	I do not support the proposed changes at all.	Value your trained educators!

Date	Name of Member	Questions that need further explanation on the proposed changes (list all questions you may have)	Concerns with the proposed changes (list all concerns you may have)	Support of the proposed changes (please select what best describes your level of support)
5/11/2023 14:26	Westmoreland Public School Staff Member	<p>How are these changes in the best interest of New Hampshire's students and families? If the rules are removed from school approval standards, would that allow the state to defund those parts of public schools? What's the purpose of removing certified teachers from approving credits towards graduation?</p>	<p>The proposed rules change the expectation for the achievement of competencies from "mastery" to "proficiency." What's the reason for lowering this expectation? How will the rules ensure that all students, regardless of where they live, have access to high-quality educational opportunities?</p>	I do not support the proposed changes at all
5/12/2023 9:18:14	Westmoreland Public School Staff Member	<p>If the intent of the rule changes is to expand pathways and opportunities, how will the state ensure that schools have the resources to support students in navigating the pathways, and ensure that every student receives a meaningful, rigorous, and engaging educational experience?</p>	<p>Fred Bramante said that it wasn't feasible to have public school teachers on the team building the rules. Many people are surprised or even appalled by this omission. It's obviously impossible to go back and redo that. But it is NOT too late to correct it going forward. Please add teachers to this very important decision making process beginning now I am concerned that it will be too late for educator input, but this is crucial since there wasn't any educator representation on the committee. I am concerned that the language of the proposed changes make this more vague, which may put way more power into the hands of government officials and less power in the hands of teachers. I am concerned that the "learn from anywhere" model will create more opportunities for charter schools, which would mean less support for public schools. I am also concerned about who will be in charge of assessing students in the "learn from anywhere" model. I am already concerned about parents and guardians becoming the highest stakeholder on the educational team, despite most guardians not having the professional training necessary to make decisions that affect student learning and growth.</p>	I do not support the proposed changes at all
5/15/2023 9:59	Keene Public School Staff Member, Taxpayer			Thank you, Robb, for requesting the presence of this committee. I would like more of these sessions as we get further down the road with the changes to make sure all stakeholders are informed.

Date/Time	Participant	Questions that need further explanation on the proposed changes (list all questions you may have)	Concerns with the proposed changes (list all concerns you may have)	Support of the proposed changes (please select what best describes your level of support)	Are there any additional comments you would like to have included?
5/16/2023 9:37:	School Board Member, Taxpayer	I believe all issues brought up were explained (defensively, which I pointed out to Fred)	The Surry Board discussed the meeting last night. Surry Board members agree with the concept of competency based education. Surry Board members agree that Standards need to be specific, not open to interpretation. Surry Board members agree that public and professional input was needed at the beginning of the process, not at the end. Surry Board members agree that the current standards are working.	I do not support the proposed changes at all.	<p>My personal thoughts:</p> <ul style="list-style-type: none"> -Robb did an excellent job in framing the meeting as a discussion and not a confrontation -The whole audience had read the Reach -Higher NH materials and agreed that standards should not be lowered (as I do) -Members of the audience I spoke with afterwards noted that the "rockstar" committee bios on their website were flashed too quickly to read, that there are Libertarians on the committee and by watering down the standards, the state may be able to reduce the amount of funding that goes to a public -"adequate education." -I believe this is another DOE effort to ram through changes the public does not want. - Carol Lothrop, Surry School Board
5/16/2023 20:43	Parent, Taxpayer, State Rep	1. Why is the commissioner not attending these sessions? 2. Where is the funding for the many changes coming from? Who will be paying for the individualized learning plans? 3. If kids are spending all of their time in ELOs, when are they learning the fundamentals? 4. If these are the minimum standards, what are we doing to ensure our kids reach their maximum potential? 5. Why have their been no teachers on the committee to make these recommendations? When do teachers get to have meaningful input? Why are their no parents on these panels? When do they get to make meaningful input? 6. Why were the public information sessions not publicized? Why do people have to work so hard to get them scheduled? 7. Competency Based minimum standards and get a Meets Expectations evaluation. How does that serve to encourage maximum achievement? 8. How can any of the work this commission does be taken seriously when the commissioner of education keeps working to defund and decertify public schools and openly states his opposition to public education?	See questions.	I do not support the proposed changes at all	

I am a (check all that apply)	I reside in (enter town or residence)	Questions that need further explanation on the proposed changes (list all questions you may have)	Concerns with the proposed changes (list all concerns you may have)	Suggest any proposed changes (please state what these describe your level of support)	Are there any additional comments you would like to have included?
5/17/2023 0:48	School Board Keene Member	Will only certified educators be allowed to grant credit for ELOs? Why is all equity language removed from the document?	These changes severely water down the value of a NH diploma. Your definition of competency is meaningless. Your definition of proficiency is also meaningless. Classroom instruction is not interchangeable with the vague term "learning opportunities". There is value in a learning community and it can not be replaced with patching together individual experiences. There is a very real possibility that ELO opportunities will simply turn into free child labor for companies. There is no possible way that teachers will be able to both teach kids in the classroom and manage a variety of students each doing their own ELO. It's not fair to ask them to.	I do not support the proposed changes at all.	It is shameful that this committee met for almost 2 years behind closed doors with no input from teachers, parents, students or other members of the community. It is even more shameful that the draft that finally was released had already been altered by the DoE so the public has no idea what the committee recommended and what the DoE inserted. It is blatantly clear that the DoE through this supposedly independently produced document is pushing to privatize and unbundle education in NH to the detriment of our students. This is garbage. The best motivation for student learning is a teacher who is personally involved and uses creativity in their lessons. The failure rate at SAU 29 is very high because you are focusing on assessments, not quality of teaching.
5/28/2023 19:21	Parent	How will students with IEPs with extended time to turn in work be fairly graded? How will the rule on doing building blocks apply so that a disabled student gets to reassess, as he is guaranteed under National Laws concerning students who need accommodations?	The problem is that the basis for the Competency Based Assessment is flawed. Negative reinforcement principles do not motivate children. Talk to the kids who are being assessed. You will find out that they are choosing to do less and they are failing more.	I do not support the proposed changes at all.	

Manchester Board of School Committee

Manchester School District ~ SAU 37



March 11, 2024

New Hampshire State Board of Education
25 Hall Street
Concord, NH 03301

Re: **Proposed changes to Ed 306 minimum standards**

To the State Board of Education:

We, the Manchester Board of School Committee, are opposed to the recently accepted draft of updated minimum standards, from February 15, 2024. We are grateful to Fred Bramante for meeting with us to present proposed changes. Nevertheless, after reviewing the latest draft of Ed 306 revisions we continue to have significant concerns, in terms of both process and substance:

PROCESS CONCERNS

- 1) **Ignoring Community feedback:** Fred Bramante led many listening sessions across NH and the feedback from these sessions—including those in Manchester—clearly articulated many concerns with the proposed revisions. Unfortunately, the current draft has not satisfied these concerns. By initiating a process to include these forums and then ignoring the feedback, the State Board of Education has negated the openness and effectiveness of the process.
- 2) **Lack of transparency:** A group of education leaders worked with Mr. Bramante on revising the standards in a way that did honor the community feedback. This January 22 draft had broad support, but it has neither been released, nor has its content been used as the basis for the current draft of 306 revisions.

CONTENT CONCERNS

- 1) **Class size maximums:** The class size requirements for K-12 have been removed—we feel that these caps on class size are essential for our students.
- 2) **Maintain local authority:** Current draft removes references to local competencies, local graduation requirements, and local assessments. Minimum standards need to ensure that Districts are the final arbiters of the role of educators, graduation requirements, and the assessment of competencies.
- 3) **Arts and PE elementary education:** The requirements for elementary schools to have certified art, music, and physical education teachers have been removed. We feel these subjects are essential for all NH students and that the requirements should be re-instated.
- 4) **Differentiated Instruction:** The requirements for differentiated student support have been removed. We feel these requirements are essential to ensure that direct instruction holds pride of place throughout the standards as it is a key driver in building personalized systems for learning.
- 5) **Competency terminology:** The language surrounding competencies has been weakened. We recommend strengthening the language, especially around direct instruction (instead of the revised "learning opportunities").

As the largest district in the state, we felt compelled to voice these concerns, and we feel they must be addressed before final approval. We look forward to seeing an update that benefits all New Hampshire students. Thank you for your consideration.

Sincerely,

Jay Ruais, Chair
Mayor of Manchester

James O'Connell, Vice Chair
Committee Member, At-Large

Peter Argeropoulos
Committee Member, At-Large

Julie Turner
Committee Member, Ward 1

Sean Parr
Committee Member, Ward 2

Karen Soule
Committee Member, Ward 3

Leslie Want
Committee Member, Ward 4

Jason Bonilla
Committee Member, Ward 5

Dan Bergeron
Committee Member, Ward 6

Chris Potter
Committee Member, Ward 7

Jessica Spillers
Committee Member, Ward 8

Robert Baines
Committee Member, Ward 9

Joy Senecal
Committee Member, Ward 10

Elizabeth O'Neil
Committee Member, Ward 11

Carlos Gonzalez
Committee Member, Ward 12

From: [Vanessa Bentley-Moeschen](#)
To: [Adams, Angela](#)
Subject: testimony for ED306
Date: Tuesday, April 2, 2024 10:38:42 AM
Attachments: [ED_306.pdf](#)

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Good day,

Please see my attached testimony for ED306.

Thank you,
Vanessa Moeschen
Woodbury School
Salem, NH

April 1, 2024

RE: Upcoming Public hearing April 2 and 11, 2024 of the NHDOE Ed 306 Administrative Rules for Public School Approval and changes to the Minimum Standards for Public School Approval.

Dear Angela Adams:

My name is Vanessa Moeschen and I am a NH state World Language Educator Spanish who resides in Rockingham County. I am writing to urge you to review the comments and suggested wording submitted by Christine Downing per the educator review sessions. Close to 300 certified teachers reviewed these proposed changes and have put forth their testimony.

Here are just a few concerns that the New Hampshire World Language Educators would like to share with you in hopes that you will revise these Rules and support a full scope for an inclusive and competent public education program.

1. Reducing student electives from 6 to 2.5 is a danger and detriment to students and educators
2. Removal of career ed. programs will have a large impact on hundreds of students statewide.
3. Alternative courses of study: needs review to maintain quality curriculum and instruction.

We as educators have deep concerns regarding: Requirements vs expectations, Rhetoric like may vs shall, Program vs curriculum , Student right to choose electives , Removal of class size capping , Local vs State control , Defining Adequate Education, ALL students to have a Personal Learning Plan (PLP), Accountability.

Sincerely,

Vanessa Moeschen



From: [Marie Morgan](#)
To: [Shea, Julie](#)
Cc: [Adams, Angela](#)
Subject: NH Minimum Standards for Public School Approval Proposed Changes
Date: Monday, April 29, 2024 10:10:28 PM

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To the NH State Board of Education

Prior to my retirement from the NH Department of Education in 2014, I worked in the Office of School Approval for many years. My coworker and I were responsible for recommending the approval or conditional approval for public and nonpublic schools. Each school administrator was required to submit health and fire reports every 3 years plus complete checklists regarding adherence to the minimum standards (ED 306). During my last few years in the position, I scheduled a team of specialists to visit schools in many districts and oversaw the final report sent to the district superintendent and DOE Commissioner. I remember visiting numerous districts including: Hollis-Brookline, Manchester, Hampton, Bartlett, Kearsage, Keene, Hanover, and Berlin. The team met with teachers and other staff to verify the schools were meeting the minimum requirements for approval. Each of these districts differed in several ways from the others, but they also were very much alike as they all worked to meet or exceed the state's minimum standards.

Recently I have read newspaper accounts of superintendents and others who are concerned about the proposed changes to the minimum standards. I tend to agree with the concerns raised by Reaching Higher NH, a state nonprofit which studies the state's educational issues. Their concerns regarding the revised draft include:

1. It redefines the purpose and structure of schools;
2. It hollows out instructional requirements;
3. It removes many aspects from local authority control;
4. Some lawmaking is occurring in the Rules; and
5. Future school funding and statewide equity could be jeopardized if districts are not required to meet a clearly defined minimum standard.

Having reviewed your biographies on the Department's website, it appears that all of you have had positions where listening to others' feedback is absolutely critical to making key decisions in your organizations.

I did not see in your biographies that any of you had taught in NH schools for any substantial period of time. Perhaps this lack of experience may lead you to wonder whose opinion to trust...the contractor or numerous superintendents who have spent their lives in public school systems working to improve the education and training of each child placed in their care.

I certainly hope you make an educated decision regarding the proposed changes to Ed 306, Minimum Standards for the Approval of Public Schools.

Sincerely,

Marie B. Morgan, USAF, Major, Retired

Goffstown, NH

From: [REDACTED]
To: [Adams, Angela](#)
Cc: [Bridey Bellemare](#); [Jane Bergeron](#); [Bill Carozza](#)
Subject: Ed 306 Minimum Standards - Collaborative Letter
Date: Saturday, March 30, 2024 11:03:39 AM
Attachments: [Collaborative 306 letter \(March 2024\).pdf](#)

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Hi Angela,

On behalf of the New Hampshire School Administrators Association (NHSAA), the New Hampshire Association of School Principals (NHASP), the New Hampshire Association of Special Education Administrators (NHASEA), and the New Hampshire Association for Supervision and Curriculum Development (NHASCD), please accept the following letter. The Executive Directors of the aforementioned organizations are all copied to this email.

We hope this letter helps provide some insight into the impact of the 306 standards and the tremendous opportunity the State Board has to advance education. Please share this letter with the State Board and enter it into the public comment for the upcoming Ed 306 Public Hearing.

Thank you for your time and consideration.

All the best.

On behalf of the NHSAA, NHASP, NHASEA, and NHASCD,

Mark



Mark MacLean, Ed.D.
Executive Director | NHSAA

[REDACTED] | [REDACTED]
<https://www.nhsaa.org>
[REDACTED]

March 30, 2024

To the esteemed members of the New Hampshire State Board of Education:

The mission and the vision of the NH State Board of Education (SBE) are incredibly lofty and integral to supporting the excellent quality of life for NH's residents, providing engaging, innovative, and diverse educational opportunities for all of NH's students and helping to create an enlightened, active, and caring citizenry. Thank you for your service to the students, families, and learning communities in our great state. New Hampshire's Pre-K – 12 public education system is consistently ranked among the best in the Nation. While the ranking has slipped since 2017 (when NH was ranked #1), the most recent US News and World Report ranks NH's Pre-K – 12 education system as #6 in the US. New Hampshire's Pre-K – 12 public education system is indeed world class. With the continued support of the SBE, public schools can evolve and continually improve, and public-school students and families will continue to receive a "personalized, student-centered education in a flexible, innovative learning environment," thus achieving the stated vision of the SBE.

A foundational and fundamental element to the SBE's mission and vision are the Ed 306 Minimum Standards for Public Schools Approval. Setting the minimum standards for a public education system that is already world class and highly ranked is certainly a daunting task. New Hampshire is also renowned for being an early adopter of Competency-Based Education (CBE). Updating the Ed 306 rules is a tremendous opportunity for the SBE to advance CBE and ensure all of NH's students and families, regardless of zip code, can readily access personalized and high-quality education opportunities. Stripping out language and requirements, while simultaneously lowering standards is counter to the SBE's mission and vision. For nearly three years, the Ed 306 rules have been being updated. This process has included a contract with an external organization, Ed 306 work groups, multiple public hearings, and significant volunteer efforts from educators passionately seeking to ensure feedback from the field is brought forth and heard. Please respect this process, voices from the field and communities, the labors of the Ed 306 work groups, and the tireless volunteer efforts of educators.

Please adopt Ed 306 Minimum Standards for Public Approval that include the following:

- Definitions informed by peer-reviewed academic studies.
- Language and definitions that advance CBE and support ongoing CBE efforts by providing a framework for local decisions, continued growth, and innovation.
- Language and definitions that ensure equitable access to a wide range of engaging educational opportunities.
- Language and definitions that ensure high standards and quality programming for students and teachers.
- A minimum number of high school courses that ensure all approved schools are required to offer NH's students with diverse choices in their academic journeys that provide them with new learning experiences, spark their personal passion for continuous learning, help shape and inform future plans, and provide the required course of study for a NH high school diploma.
- Class sizes that assist districts in creating budgets, allocating resources (personnel and supplies), and crafting schedules where students are able to receive personalized, supportive, engaging, expert, and diverse learning.

Please respect and listen to the voices from the field, the public, and members of the 306 work groups. Your adoption of the Ed 306 Minimum Standards for Public Schools Approval is significant to keeping NH as a highly ranked state overall and for Pre-K – 12 public education. Standards that create inequities, remove choices, lower quality, de-value trained and licensed teachers, and are not informed by peer-reviewed research should not be considered.

Respectfully,





New Hampshire School Boards Association

Barrett M. Christina, Executive Director
Tim Dow, President, Franklin
Matt Pappas, First Vice President, Rochester
Holly Kennedy, Past-President

25 Triangle Park Drive, Suite 101
Concord, NH 03301
Phone: (603) 228-2061
www.nhsba.org

April 29, 2024

State Board of Education
New Hampshire Department of Education
25 Hall Street
Concord, NH 03301

Re: Minimum Standards for Public School Approval

Sent via e-mail

Dear Members of the State Board of Education:

Please accept this correspondence as official comments on behalf of the New Hampshire School Boards Association relative to the proposed Ed 306 Rules – Minimum Standards for Public School Approval. NHSBA’s testimony does not address the entirety of the proposed draft but will rather focus on areas impacting school board governance.

School Board Policies under proposed Ed 306.04

NHSBA believes that the reorganization of the required school board policies, both in this section and throughout the proposed changes, are assistive in helping local school boards identify their important policy needs. The current version of the Minimum Standards has policy requirements littered throughout. Combining them into one section is sensible.

NHSBA notes a few concerns relative to these policy requirements.

First, while some of the policy requirements are removed, much of the proposed language seems to be writing the policy for local school boards by dictating what the policy “shall include.” NHSBA finds much of the proposed language to be too prescriptive. While NHSBA does not object to the Minimum Standards having broad policy requirements, we believe that the content and wording of these policies should be left to local school boards, recognizing that the policy needs in Manchester will be different than the policy needs in Colebrook.

Second, NHSBA respectfully asks the State Board to amend the proposed Minimum Standards to delay implementation or effective dates of these amended policy requirements by six months. To be done using appropriate processes, local school board policy development takes a few months. Policies are often introduced by the administration to a policy committee. The committee works on the policy then brings an initial proposal to the full school board. Depending on the nature and content of the policy, it may be sent back to the committee for review and amendment before the full school board formally adopts the policy.

There is precedent for this, as the 2014 version of the Minimum Standards delayed implementation of new and revised required policies to allow school boards to implement numerous policy changes. NHSBA asks that this practice continue.

Changes to vital words and without clear rationale or definition.

One of NHSBA's largest concerns with this draft is the significant change in vital terms and phrases without a clear rationale or a clear definition of those new terms and phrases.

For example, Ed 306.08 is changed from "Instructional Resources" to "Learning Resources" or "Learning Opportunities". Similar changes from "instructional" to "learning" are noticed throughout the draft. While there is some reasoned support for language change in RSA 193-E, Adequate Public Education, it marks as a sharp contrast to what public schools do. Public schools, through a system of highly qualified, licensed educators, instruct children. However, the definition of "Learning opportunities" in proposed Ed 306.02(r) focuses less on classroom instruction and more so on instruction via other means.

Another example of significant language changes come in the form of changing "courses" and "classes" to "facilitating learning". Similarly, the phrase "teaching" currently appears 10 times in the current version of Ed 306, whereas the draft all but eliminates that word.

Further, current Ed 306.21 speaks to "Alternative Programs" and defines these programs as "the regular delivery of the majority of a student's instruction through classroom or other methods designed to address the needs of individual students or particular groups of students that might be different from the methods of instruction used by the standard schools of the district."

This definition implies that "alternative programs" are just that – alternatives to regular school programs. However, the proposed draft of the Minimum Standards inserts replaces

“program” with “course of study”. NHSBA believes a program and a course of study are distinct and different. Further, NHSBA also believes that this proposed language changes the original and primary intent of “alternative programs”.

NHSBA respectfully asks the state board to clarify why these significant changes to the above-referenced language are being made.

Impact of the proposed rules on local credit-earning requirements.

NHSBA continues to have concerns with proposed requirements that diminish local graduation standards, especially those that are replaced by standards developed by non-educators who may or may not align certain competencies with competencies developed by local school districts.

For example, the draft eliminates the requirement that local school boards have a policy on how credit is earned and how credit is used to track achievement of graduation competencies. Rather, the revised section states that school districts must award credit to students regardless of the student’s enrollment status. NHSBA questions whether local school boards will be issuing credit and diplomas to students who are not enrolled in the district.

Also, though not specifically related to the earning of credit, the proposed rules eliminate wording from the definition of “educator” that the educator be certified by the state board pursuant to RSA 189:39.

To be clear, NHSBA supports students learning outside of the classroom through experiential learning via extended learning opportunities, independent study, performing groups, internships, and the like, which are approved by the local school board. One key difference between the current extended learning opportunity and experiential structures and the proposed rule is that local school districts establish their own local standards, overseen by credentialed educators, because it is the local school board that is issuing the diploma.

Related, NHSBA has concerns over the removal of “mastery” as it relates to local competencies leading toward high school graduation. As the current rule states, mastery means “means a high level of demonstrated proficiency with regard to a competency.” The proposed rule turns this on its head by defining “proficiency” as the “minimum student performance required.”

Last, proposed rule 306.21(j) (Page 31 of the February 2024 draft) states “Credits shall be awarded for achievement of competencies.” This proposal removes reference to “district and or graduation” competencies and also removes language relative to the “level of rigor and achievement necessary to master competencies.”

Again, NHSBA asks the state board to publicly state its rationale for these significant changes.

How will these changes impact state and local funding?

In February 2008, a Joint Legislative Oversight Committee on Costing an Adequate Education issued a report and findings of how to define, cost and fund the opportunity for an adequate public education. In various places in that report, the Committee referenced the Minimum Standards to determine required state adequacy funding. The report referenced maximum class sizes, required elements of an adequate education (including art, music, health, and physical education), certified teacher salaries, certified principal-to-student ratios, technology, professional development costs for teacher, facilities and maintenance, and a host of other necessities needed to operate a public school consistent with both state statute, Department of Education regulations, and the mandates of the Claremont decisions.

Essentially, the Minimum Standards have long been a key component to determining state funding. NHSBA has concerns that various aspects of the proposed rules may negatively impact adequate education funding.

For example, the draft Minimum Standards eliminates class size maximums. The draft eliminates various sections that speak to or otherwise require certified educators.

Also, the proposed rules state that “The school district shall provide, when necessary, all equipment, software, internet connectivity necessary to participate in remote learning or alternative courses of study or learning opportunities that are to be counted toward the courses required...” (Page 33). This provision gives NHSBA significant cause for concern, especially as it relates to Alternative Course of Study in proposed Ed 306.17 (Page 19).

Does this mean that the local school district will be required to pay for a student’s Learn Everywhere program, if that program is being used to earn credit for one of the required courses? Does this mean that a school district will have to pay for a student’s computer and internet if the student is enrolled in a VLACS class to earn credit for one of the required courses? NHSBA believes the state board should reconsider this particular provision.

Impacts of pending legislation.

As the state board is likely aware, there are currently multiple bills pending before the New Hampshire Legislature that directly impact adequate education and the minimum standards. Those bills are:

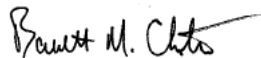
- SB 378: relative to the performance-based school accountability system task force.
- HB 468: establishing a commission to recodify the education laws and making an appropriation therefor.
- HB 1107: relative to public school curriculum frameworks.
- HB 1163: relative to review of public school minimum standards by the legislative oversight commission.
- HB 1160: relative to school assessments of statewide academic areas.
- HB 274: relative to the administrative rulemaking process.
- SB 266: relative to administration of school assessment and accountability programs by the department of education.

NHSBA suggests that it may be prudent for the state board to wait until this legislative session ends before it adopts revised Minimum Standards, lest these bills have a significant impact on RSA 193-E and other statutes that relate to school assessment and accountability. NHSBA recognizes and understands that the state board is under statutory requirements in terms of timing, delaying implementation, and the like. However, to the extent possible, NHSBA believes waiting until the current legislative session ends before adopting new rules would be prudent.

Last, NHSBA knows full well the time and effort spent in working through these rules. We are appreciative of members of the initial task force for sharing their invaluable knowledge and expertise, as well as Department staff who worked on this undertaking. It is NHSBA's earnest hope that the state board will give due consideration to all the public comments it receives during this process and make changes consistent with those comments.

Thank you for your consideration.

Respectfully,



Barrett M. Christina
Executive Director

From: [Adams, Angela](#)
To: [Deborah Bacon Nelson](#)
Subject: RE: Letter for the Board of Education
Date: Monday, April 29, 2024 2:15:26 PM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12.

Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

The contents of this message are confidential. Any unauthorized disclosure, reproduction, use or dissemination (either whole or in part) is prohibited. If you are not the intended recipient of this message, please notify the sender immediately and delete the message and any attachments from your system.

From: Deborah Bacon Nelson [REDACTED]
Sent: Monday, April 29, 2024 12:23 PM
To: Adams, Angela <Angela.adams@doe.nh.gov>
Subject: Letter for the Board of Education

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The below email attachments triggered a violation of the State's allowed attachment types. They have been removed and are not recoverable.

[Proofpoint POD – State of New Hampshire]

List of files deleted: letter to state board of educationapril 29, 2024.gdoc

Dear Ms Adams,

Please find enclosed a letter I would like you to share with the members of the Board of Education. I am attaching it as a separate document and also including it in the body of this email.

Thank you.

Deborah H. Bacon Nelson

Letter to State Board of Education April 29, 2024

To the Commissioner of Education and Members of the Board of Education

I write to you as a 30 year veteran teacher in New Hampshire schools and as a current school board member to ask you to listen to the concerns that have been expressed over the proposed revisions to the New Hampshire Educational Standards.

My concerns are informed by many years of teaching and by my current responsibilities as a member of the Hanover, Dresden, and SAU70 School Boards. The proposed changes directly challenge the long held responsibility of local boards for their schools. Specifically - these changes challenge our ability to establish graduation requirements. They also challenge our ability to establish minimum standards for courses that meet graduation requirements by broadening the number of online possibilities without setting in place any criteria for evaluating those courses.

The proposed changes in language - from shall to may - upend the expectation that a public education will be consistent district to district and instead, underscore the differences between wealthier districts and those with fewer options for funding. While the Hanover/Dresden Districts are committed to maintaining limits on class size, on the licensing of classroom teachers, on offering career development and post-secondary advising, other districts are likely to find themselves having to make drastic cuts in programs and staffing.

While I am very concerned with the process the Board has followed, and the omission of professional teachers, administrators experienced with curriculum, and building principals, I have been reassured by the incredible work of Christine Downey to bring these perspectives to your attention. I urge you to accept the work of this group and **approve the existing 306 standards.**

For many years I worked in college admissions, and the quality of a New Hampshire public education and a New Hampshire high school diploma was never in question. I am very concerned that the proposed changes in standards will water down the credibility of what happens in our schools. I recognize that this might well be your intention, and I understand that the shifting of dollars to private schools without any oversight, is a model with which you are very comfortable. Nonetheless, I remain hopeful that you will stop short of undermining education in this state in ways that will be profoundly damaging for

many years.

Sincerely,

Deborah H. Bacon Nelson

Hanover, NH

Hanover, Dresden, SAU70 Board Member

Experienced Educator

Former Admission Officer - Princeton University, Dartmouth College

From: [Jessica Paeplow](#)
To: [Adams, Angela](#)
Subject: Written testimony ED 306
Date: Tuesday, April 2, 2024 11:09:34 AM
Attachments: [Written testimony ED 306 .pdf](#)

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Jessica M. Paeplow *M.S. TESOL*
ESOL Coordinator
SAU 81 - Hudson NH
"Breathe. Smile. Repeat "

April 2, 2024

RE: Upcoming Public hearing April 2 and 11, 2024 of the NHDOE Ed 306 Administrative Rules for Public School Approval and changes to the Minimum Standards for Public School Approval.

Dear Angela Adams:

My name is Jessica Paepflow and I am a NH state World Language Educator in Hudson NH who resides in Rockingham County. I am writing to urge you to review the comments and suggested wording submitted by Christine Downing per the educator review sessions. Close to 300 certified teachers reviewed these proposed changes and have put forth their testimony.

Here are just a few concerns that the New Hampshire World Language Educators would like to share with you in hopes that you will revise these Rules and support a full scope for an inclusive and competent public education program.

1. Reducing student electives from 6 to 2.5 is a danger and detriment to students and educators
2. Removal of career ed. programs will have a large impact on hundreds of students statewide.
3. Alternative courses of study: needs review to maintain quality curriculum and instruction.

We as educators have deep concerns regarding: Requirements vs expectations, Rhetoric like may vs shall, Program vs curriculum, Student right to choose electives, Removal of class size capping, Local vs State control, Defining Adequate Education, ALL students to have a Personal Learning Plan (PLP), Accountability.

Sincerely,

Jessica M. Paepflow



April 2, 2024

Dear State Board of Education,

I would like to offer this public testimony to the hearing on April 4th at 1pm for revision of the **Ed 306.01-Ed 306.25 Minimum Standards for Public School Approval**. Please include this in the records, and present this as public testimony as part of the hearing.

I feel that the definition of **Rigor** needs to remain the language from the original ED 306 rules. **Rigor**, which means the depth with which students are expected to demonstrate, communicate, and apply knowledge and skills aligned to competencies, is essentially a level of understanding in Bloom's Taxonomy which allows one to utilize knowledge in a variety of scenarios outside of the environment or situation in which it is being learned. This should be the level of which we strive to teach our next generation.

As the workgroup articulated in their proposed definition for "**Achievement of Competencies**," and as is in keeping with how the state monitors School Districts, it feels most appropriate that there should be a requirement for a *defensible body of learning evidence* to demonstrate competencies; without this, it could just be a nod and a handshake, which is meaningless and unprovable, not defensible, not auditable. I also agree with the Workgroup's inclusion of the language "at a proficient level associated with local articulated curriculum for a course of study;" if local School Districts are awarding credit, then the credits being awarded must be due to a student's achievement of competencies at a level of rigor that is expected at their local level, for their local School District, regardless of where the competency was learned, regardless of where the defensible body of learning evidence was acquired or collected. Local established curriculum expectations are what needs to be met in order to earn a public school diploma.

The proposed NHED version of the definition for **Competencies** is weak and vague. I feel that either the definition that currently exists, or the definition written by the Workgroup, are both of higher quality and clarity, and that the NHED version is ineffectual.

The current rules definition for **Credit** includes the word "demonstrated," whereas the proposed version does not. Going back to the "**Achievement of Competencies**" definition, I feel strongly that any definition of Credits should also include language related to *demonstrated achievement*, or *defensible body of learning evidence*.

The definition of **Work Study Practices** I feel should be the version proposed by the Workgroup. This definition should be explicit, and not only reference an RSA outside of these rules with minor supporting language.

ED 306.4 (13); ED 306.4 (14) [Revised in the NHED version as ED 306.4(12); ED 306.4 (13)] I feel that the Workgroup language should be used here. The NHED version supports providing alternative means to

earn credit, whereas the Workgroup identifies it as alternative means of demonstrating achievement of competencies towards the awarding of credit; the Workgroup's language is more explicit, appropriate, and in tune with what happens in real life.

I feel that the terms VLACS and Learn Everywhere programs should be removed from **ED 306.4 (20)(d)(4)**; these are specific programs, which should not be explicitly identified in a general state rule.

Graduation competencies for the base expectation of all NH citizens should exist within this ruleset. Please do not eliminate ED 306.4 (25); this rule is what guides the expected core curriculum that every NH community member is exposed to. It will cheapen our society if we remove this explicit baseline of knowledge every NH citizen is expected to have, which includes math, science, reading, history, arts education, personal finance, digital literacy, and health/ physical education.

I do not agree that the language within the current rules **ED 306.15** [in the NHED proposed ED 306.12 rules should have language which changes *certified* to *licensed*. We are required by law to be certified by the state of NH, not licensed by any other agency. It needs to stay that way; the state needs to maintain this expectation, that NH educators are certified by the DOE.

I believe that this language is missing under **ED 306.4**, and feel that it should exist somewhere within this policy section, "An organized plan for recording student progress in meeting district and graduation competencies."

I'd like to advocate for no change to the original rules regarding class sizes, **ED 306.18** [in the NHED proposed draft, ED 306.15]. The proposed draft does not have explicit student body sizes, which exists to enforce a safe amount of students within one class. With rising behaviors and student need, increasing class sizes past the pre-established numbers is unsafe.

Please reinstate this language;

ED 306.17 Class Size.

(a) Class size for instructional purposes, in each school shall be:

(1) Kindergarten – grade 2, 25 students or fewer per educator, provided that each school shall strive to achieve the class size of 20 students or fewer per educator;

(2) Grades 3 – 5, 30 students or fewer per educator, provided that each school shall strive to achieve the class size of 25 students or fewer per educator; and

(3) Middle and senior high school, 30 students or fewer per educator.

(b) These class size requirements may be exceeded for study halls, band and chorus, and other types of large group instruction, including but not limited to, lectures, combined group instruction, and showing of educational television and films.

(c) In the interest of safety, the maximum number of students in laboratory classes in such areas as science and career and technical education shall be determined by the number of work stations and the size and design of the area. In no case shall the number of students in laboratory classes exceed 24.

I do not agree to deleting **ED 306.19 School Calendar**. Each school should be required to maintain a school calendar; I feel that this is best practice.

ED 306.21 Alternative Programs; I endorse the Workgroup's language for this section. Converting ED 306.21 Alternative Programs to ED 306.17 Alternative Course of Study is not equal, and creates challenging technical inequities. Alternative Programs, as I believe is intended through the original ED 306 rules, is in regards to educational programs that are approved by the NH DOE. Courses of Study are not approved by the NH DOE, and applying the same ruleset to something that is not monitored by the DOE is not appropriate.

ED 306.24 Assessment should absolutely not be removed as a part of this ruleset. Again, going back to requiring a *defensible body of learning evidence*, some form of assessment must take place. Again, if we are required to produce the burden of proof when engaged in state audits, then we must require that our education systems have concrete proof that competencies are being met for awarded credit. This in no way should be stricken from the ED 306 rules.

Thank you,

Beth Page
Andover, NH

From: [Sean Parr - Ward 2](#)
To: Kate.J.Cassady@affiliate.doe.nh.gov; [Lane, Ann](#); Philip.J.Nazzaro@affiliate.doe.nh.gov; [Cline, Andrew](#); Ryan.A.Terrell@affiliate.doe.nh.gov; [Sala, Richard](#); James.M.Fricchione@affiliate.doe.nh.gov
Cc: [Adams, Angela](#); [Edelblut, Louis \(Frank\)](#); [Brennan, Christine](#); [Shea, Julie](#)
Subject: Manchester's Ed306 concerns
Date: Friday, March 29, 2024 12:47:34 PM
Attachments: [BOSC_306_letter_followup_March_2024_signed.pdf](#)

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Dear Members of the State Board of Education,

I am writing on behalf of the Manchester School Board, which has authorized me to communicate our **opposition** to the proposed revisions to the Ed 306 Minimum Standards that were accepted in draft form on February 15, 2024. I have pasted below a letter outlining our concerns as this process moves forward. The signed letter is also attached- it was approved at our March full Board meeting.

Thank you very much for your consideration,

Sean M. Parr, PhD
Manchester Board of School Committee, Ward 2
Chair, Education Legislation Committee

Re: Proposed changes to Ed 306 minimum standards

To the State Board of Education:

We, the Manchester Board of School Committee, are opposed to the recently accepted draft of updated minimum standards, from February 15, 2024. We are grateful to Fred Bramante for meeting with us to present proposed changes. Nevertheless, after reviewing the latest draft of Ed 306 revisions we continue to have significant concerns, in terms of both process and substance:

PROCESS CONCERNS

- 1) **Ignoring Community feedback:** Fred Bramante led many listening sessions across NH and the feedback from these sessions—including those in Manchester—clearly articulated many concerns with the proposed revisions. Unfortunately, the current draft has not satisfied these concerns. By initiating a process to include these forums and then ignoring the feedback, the State Board of Education has negated the openness and effectiveness of the process.
- 2) **Lack of transparency:** A group of education leaders worked with Mr. Bramante on revising the standards in a way that did honor the community feedback. This January 22 draft had broad support, but it has neither been released, nor has its content been used as the basis for the current draft of 306 revisions.

CONTENT CONCERNS

- 1) **Class size maximums:** The class size requirements for K-12 have been removed—we feel that these caps on class size are essential for our students.
- 2) **Maintain local authority:** Current draft removes references to local competencies, local graduation requirements, and local assessments. Minimum standards need to ensure that Districts are the final arbiters of the role of educators, graduation requirements, and the assessment of competencies.
- 3) **Arts and PE elementary education:** The requirements for elementary schools to have certified art, music, and physical education teachers have been removed. We feel these subjects are essential for all NH students and that the requirements should be re-instated.
- 4) **Differentiated Instruction:** The requirements for differentiated student support have been removed.

We feel these requirements are essential to ensure that direct instruction holds pride of place throughout the standards as it is a key driver in building personalized systems for learning.

5) **Competency terminology:** The language surrounding competencies has been weakened. We recommend strengthening the language, especially around direct instruction (instead of the revised “learning opportunities”).

As the largest district in the state, we felt compelled to voice these concerns, and we feel they must be addressed before final approval. We look forward to seeing an update that benefits all New Hampshire students. Thank you for your consideration.

Sincerely,

Jay Ruais, Chair, Mayor of Manchester
James O’Connell, Vice Chair, Committee Member, At-Large
Peter Argeropoulos, Committee Member, At-Large
Julie Turner, Committee Member, Ward 1
Sean Parr, Committee Member, Ward 2
Ward 3
Leslie Want, Committee Member, Ward 4
Member, Ward 5
Dan Bergeron, Committee Member, Ward 6
Chris Potter, Committee Member, Ward 7
Jessica Spillers, Committee Member, Ward 8
Member, Ward 9
Joy Senecal, Committee Member, Ward 10
Member, Ward 11

Karen Soule, Committee Member,

Jason Bonilla, Committee

Robert Baines, Committee

Elizabeth O’Neil, Committee

Carlos Gonzalez, Committee Member, Ward 12

From: [Susanne Peace](#)
To: [Shea, Julie](#)
Subject: 306 Rules
Date: Monday, April 29, 2024 8:54:57 PM

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Hello,

I want to add my concerns and voice my objections to changes in the 306 rules. I am a parent of two children who attended public school in New Hampshire and a big supporter of public schools. I believe that we need to do everything we can to maintain and strengthen the education provided to all of our children in the State.

I have not read any research based evidence that demonstrates that the proposed changes will lead to better outcomes for all of our children. Without evidence, the proposed changes dilute our educational standards and aim to eliminate limits on class size rather than ensure equity and high and clear expectations for outcomes.

Our public schools need to be the pride of every community and we owe it to our children to provide an education that prepares them to be informed and educated citizens.

As a parent, I am following these proposed rule changes and I don't like the direction that these changes are taking. I am wary of the transfer educational decisions from local elected school boards to the appointed members of the New Hampshire School Board.

Please count this letter as my opposition to the proposed changes to the 306 rules.

Susanne Peace, Dunbarton

From: [MaryEllen Reinsel](#)
To: [Adams, Angela](#)
Subject: Testimony for April 3, 2024 public hearing related to 306 Rules
Date: Monday, April 1, 2024 9:16:28 PM

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To the New Hampshire Department of Education;
Attention: Angela Adams

Dear Ms. Adams,

Please include these comments as written testimony submitted for the April 3, 2024 public hearing.

I am a tax-paying resident of Enfield, New Hampshire, and I have been an educator in a New Hampshire public school for fourteen years. I have grave concerns about the NHDOE's proposed revisions to the 306 Rules.

Specifically, it concerns me that some of the proposed revisions could reduce equitable access to public education in general and content-area instruction in particular by changing language in the Rules from "shall" to "may," effectively transferring the responsibility for determining many aspects of public education from the State to the local school board. This also would mean that funding for various aspects of public education would become the responsibility of the local community. This could reduce the State's obligation to fund aspects of public education and, in turn, could have a significant impact on local property taxes if local school boards decide to maintain their high-quality public schools as they currently exist.

Language related to maximum class sizes has been replaced with language that leaves the "establishment of student-educator ratios" to the local school board. This could mean that in an effort to reduce the punishing financial impact of school budgets on the local taxpayer, class sizes could increase dramatically. A great deal of research shows that smaller class sizes and quality teachers have a significant impact on student achievement.

Furthermore, at a time when the mental health of students is an area of nationwide concern, the proposed revisions to the 306 Rules outline major changes and deletions related to the provision of comprehensive school psychological services.

Language related to teacher certification has been replaced with language specifying teacher licensure. What does this mean? In addition, the definitions of instructional time and remote learning have been changed.

When compared with other states, New Hampshire has a very strong national ranking for the quality of its public education. These proposed revisions to the 306 Rules threaten to eviscerate public education in New Hampshire. I strongly encourage you to maintain the 306 Rules as they currently exist, until a more comprehensive review process, one that effectively incorporates the voices and expertise of experienced educators, can be undertaken.

Respectfully submitted,

MaryEllen Reinsel
Enfield, New Hampshire

From: [Bonnie Robinson](#)
To: [Adams, Angela](#)
Subject: The 306 Minimum Standards
Date: Monday, April 1, 2024 1:54:52 PM
Attachments: [BR Letter for Public Written Record.pdf](#)

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Please include the attached letter as part of the public written record.
Thank you,
Bonnie

--

Bonnie Robinson, Ed.D.
Director of Curriculum, Instruction, and Assessment
Lebanon High School
[REDACTED]
(she, her)

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LEBANON HIGH SCHOOL

195 Hanover Street • Lebanon, New Hampshire 03766 • Main Office (603) 448-2055 • Fax (603) 448-1356

April 1, 2024

Greetings,

I am unable to attend the hearings on April 3 or April 11, so I would like this letter to be admitted as part of the public written record.

In brief, please consider these points:

- **Process:** I question the process to date including, but not limited to:
 - the decision for the revision to be farmed out to a sole provider
 - the lack of educators' input and peer-reviewed research in the current draft of the 306s
 - the lack of transparency about the entire process
 - the seeming hurry to approve the revisions
- **Local Control:** From my testimony in opposition to Learn Everywhere in 2019, "We believe in the rights and responsibilities of school boards to create the policies, establish the funding, and make all decisions regarding what is best and most important for the town in which they serve. Local control is quintessential to New Hampshire, and as un-movable as the granite on which our communities are built." The 306 revisions continue to erode local control, when what we really need is a balance of local and state control. The state needs to uphold its responsibility in defining and funding an adequate education. The state has a right to tell us what we need to do in terms of minimum standards and academic standards, but how we do it (i.e. instruction and curriculum) are local control. ED 1400 rules crossed that line by mandating that high schools have to accept these LE credits leading to graduation.
- **Rigor:** The specifics of Learn Everywhere expectations speak to the overall dumbing down of academic expectations and personnel through the proposed changes to the minimum standards. Districts "have no oversight regarding curriculum, supervision, accountability, assessment, privacy and confidentiality, course content, rigor, health, safety, or welfare, standards alignment, or teacher licensure and qualifications." Our district prides itself on the quality of our educators and the results we achieve. You will note that Lebanon is in the top tier on AP scores in 2023, and NH was #1 in the nation. What we are doing is working, and it is shameful that the State Board and the drafters of these rules want to undermine a successful public education.

- **The Potential of the 306 Standards to Provide Equity Across the State:** New Hampshire has every right to be proud of our educational system and outcomes, consistently ranked near the top in the country. The 306 Standards provide the minimum expectations, and they must:
 - Ensure equitable access to a wide range of engaging educational opportunities and programming across the state
 - High standards for teacher training, qualifications, and licensure
 - The minimum credits required for a high school diploma including English, Social Studies, Science, Math, Arts, Physical Education, Health, and Technology.

The current draft of the 306 standards should be tabled. If approved, it will undermine the quality and consistency of the educational experience for New Hampshire students.

Sincerely,



Bonnie Robinson, Ed.D., NBCT

LHS Director of Curriculum, Instruction, and Assessment

From: [Sarah Robinson](#)
To: [Shea, Julie](#); [Adams, Angela](#)
Subject: Submission of public testimony, re: ED 306s
Date: Wednesday, April 3, 2024 1:30:14 PM

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Julie and Angela:

I did not have an opportunity to finish my comments during the public hearing, so I am submitting those comments here for your review and for distribution to the State Board of Education. Thank you very much for your help.

Testimony:

Commissioner, Mr. Chair, and the State Board of Education, thank you for the opportunity to speak to you this afternoon. My name is Sarah Robinson and I'm the Education Justice Campaign Director for Granite State Progress. I am also a mother of two elementary aged children who attend our local public school.

I have testified in front of this board several times over the past few years regarding the ED 306s, the process by which they have been addressed, and the content of the revised versions. The frustrating truth is that throughout these various iterations, those concerns- which are shared among many public education supporters and advocates- have not been sufficiently addressed. If the current draft goes into law, the public schools we cherish and serve will no longer have the robust support of well defined and rigorous academic standards, leading to an advanced bleeding of resources- especially from rural and underserved districts.

It is also important to validate that a primary audience for this document are our superintendents. As the CEOs of our public schools, they need these manuals of operation to be precise and descriptive. The hollowing out of instructional requirements, vague and sterile definitions, and altering the role of the school from determining the path of credits earned for graduation to simply "ensuring" that learning opportunities lead to graduation do not give our administrative teams the authority they need to effectively guide their public school to a level of excellence that reflects the needs and desires of their local communities.

Specifically, the pro-public education supporters and advocates I work with have the following concerns about the draft:

- It redefines the purpose and structure of a school, such as changing courses to "learning opportunities."

- The draft hollows out instructional requirements by no longer applying the responsibility of certified educators to approve a student's demonstration of competency.
- It also removes local authority to define district competencies, courses, and credits that lead to graduation. (pg 31)
- There are, of course, potential funding implications with all of these changes. The key language shift from "shall" to "may" that strips requirements for academic content areas is reminiscent of HB 1671, which sought to strip requirements for academic content areas.

I believe the best course of action moving forward is to re-approve the current 306 Rules, then revisit the editing process and make updates as necessary. The rules already in existence do a fine job of helping schools run at present. Reverting to the existing language and being more intentional with the editing process by making sure we have qualified educators, parents, and other stakeholders helping to write the updated rules will be a crucial step forward in giving the public and administrators confidence in the results. The most qualified individuals to task with updating the ED 306s are the people who are on the front lines of public education. Educators are continually on the cusp of education innovation, improving their skill set and advancing their careers so that our students are able to succeed in ways previous generations only dreamed of. Please accept their guidance, especially by listening to the educator feedback gathered through the listening sessions convened by Christine Downing.

Thank you for holding this space for the public. I hope you take the concerns expressed seriously. The repercussions of these decisions will affect public school students for the next decade, as well as our businesses and community. The quality education of our future leaders is too precious to risk in any way. Thank you.

With Gratitude,
Sarah

Sarah Robinson
Education Justice Campaign Director
Granite State Progress

[REDACTED]
[REDACTED]

To book time to meet, please use my Calendly link:

[REDACTED]

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[Follow us on Twitter!](#)

I acknowledge that I live and work on the land of the Pennacook Abenaki people of the Wampanoag Confederacy, who walked gently on the land many centuries before me. I am committed to learning about their history, culture, and stories, and to share them with my own community. If you would like to learn about who's land you currently occupy, please visit <http://native-land.ca>

This email is a private communication. If you are not the intended recipient, please disregard and do not divulge any information contained herein. Please notify the sender, and delete this email.

From: [Mary Shepardson](#)
To: [Adams, Angela](#)
Subject: Public Hearing Comments and Concerns
Date: Monday, April 1, 2024 12:02:50 AM

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In anticipation of the public hearing being held on April 3, 2024 to change the intent of the 306 standards, I would like to voice my objections to the potential changes.

The points that I feel are problematic are:

1. 306 Standards: removal of foundational curriculum and content in place for instruction. I feel setting minimal standards, or making standards and curriculum optional to each school or district does not set the tone or expectations of rigor for all students, and may lessen their readiness and success in secondary educational pursuits or preparation to join the workforce.

2. The lessening of standards 306 foundation also changes the equality of education for students across the state. The playing field will no longer be level for all students in the state with the possibility of access less for some districts and more for others. This could possibly limit opportunities for some students in some districts. I feel we owe best practices to each child in our state.

3. While it is challenging to fill all teaching positions in our state currently, giving districts the opportunity to hire noncertified, educated professionals to teach in our classrooms is unfair to student success. Rather, we should be looking at incentives, training opportunities and collaboration to build the instruction leading to certification to individuals interested in becoming educators. Make the certification held in high esteem and provide incentives and opportunities to achieve it, whether it be through mentoring, online training while working in the classroom or coteaching scenarios.

Thank you for taking the time to read this and give some weight to the concerns.

Mary Shepardson, MEd.

Retired special educator

Monadnock Regional School District

From: [Daniel Smith](#)
To: [Adams, Angela](#)
Subject: ED 306
Date: Monday, April 1, 2024 10:00:01 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

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To the esteemed members of the New Hampshire State Board of Education,

The mission and the vision of the NH State Board of Education (SBE) are incredibly lofty and integral to supporting the excellent quality of life for NH's residents, providing engaging, innovative, and diverse educational opportunities for all of NH's students and helping to create an enlightened, active, and caring citizenry. Thank you for your service to the students, families, and learning communities in our great state. New Hampshire's Pre-K – 12 public education system is consistently ranked among the best in the Nation. While the ranking has slipped since 2017 (when NH was ranked #1), the most recent US News and World Report ranks NH's Pre-K – 12 education system as #6 in the US. New Hampshire's Pre-K – 12 public education system is indeed world class. With the continued support of the SBE, public schools can evolve and continually improve, and public-school students and families will continue to receive a "personalized, student-centered education in a flexible, innovative learning environment," thus achieving the stated vision of the SBE.

A foundational and fundamental element to the SBE's mission and vision are the Ed 306 Minimum Standards for Public Schools Approval. Setting the minimum standards for a public education system that is already world class and highly ranked is certainly a daunting task. New Hampshire is also renowned for being an early adopter of Competency-Based Education (CBE). Updating the Ed 306 rules is a tremendous opportunity for the SBE to advance CBE and ensure all of NH's students and families, regardless of zip code, can readily access personalized and high-quality education opportunities. Stripping out language and requirements, while simultaneously lowering standards is counter to the SBE's mission and vision. For nearly three years, the Ed 306 rules have been being updated. This process has included a contract with an external organization, Ed 306 work groups, multiple public hearings, and significant volunteer efforts from educators passionately seeking to ensure feedback from the field is brought forth and heard. Please respect this process, voices from the field and communities, the labors of the Ed 306 work groups, and the tireless volunteer efforts of

educators.

Please adopt Ed 306 Minimum Standards for Public Approval that include the following:

- Definitions informed by peer-reviewed academic studies.
- Language and definitions that advance CBE and support ongoing CBE efforts by providing a framework for local decisions, continued growth, and innovation.
- Language and definitions that ensure equitable access to a wide range of engaging educational opportunities.
- Language and definitions that ensure high standards and quality programming for students and teachers.
- A minimum number of high school courses that ensure all approved schools are required to offer NH's students with diverse choices in their academic journeys that provide them with new learning experiences, spark their personal passion for continuous learning, help shape and inform future plans, and provide the required course of study for a NH high school diploma.
- Class sizes that assist districts in creating budgets, allocating resources (personnel and supplies), and crafting schedules where students are able to receive personalized, supportive, engaging, expert, and diverse learning.

Please respect and listen to the voices from the field, the public, and members of the 306 work groups. Your adoption of the Ed 306 Minimum Standards for Public Schools Approval is significant to keeping NH as a highly ranked state overall and for Pre-K – 12 public education. Standards that create inequities, remove choices, lower quality, de-value trained and licensed teachers, and are not informed by peer-reviewed research should not be considered.

Respectfully,
Dan



DAN SMITH (he/him)
CEO
KEENE FAMILY YMCA | 200 Summit Rd, Keene, NH 03431

For a better us.®



From: [Linda Terwilliger](#)
To: [Shea, Julie](#)
Subject: Public Comment on Proposed Revisions of NH's "Minimum Standards for Public Schools"
Date: Monday, April 29, 2024 4:50:56 PM

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Dear Members of the NH Board of Education,

As a NH resident and supporter of our public schools, I urge you to re-approve the current, existing 306 Rules for public schools, as is, instead of moving forward with the proposed draft revision at this time.

I ask you to revisit your editing process at a later time and make updates to address the very valid concerns expressed by experienced public education leaders.

The Board needs to spend more time listening to educators who believe the proposed changes do not meet the needs of students and communities for quality education.

The minimum standards must clearly define the baseline standards of what constitutes an adequate education in non-ambiguous language that requires no guesswork on the part of educators and school leaders.

No matter where a student lives, they should receive consistent access to quality education. School standards must clearly and consistently define the curriculum expectations including what students should know and be able to do upon graduation from a public school in our state.

The standards must maintain class size limits to ensure educators can adequately provide instruction to all Granite State students that meet their individual learning needs.

Also, the standards must protect local competencies, graduation requirements, and assessments to ensure public education meets the needs of individual communities and their students. For instance, the standards must maintain the use of the term "grade level" as opposed to "learning level" when referencing the configuration of school organization and preserve language that addresses equity and fairness.

The draft proposal changes "shall" to "may" in several areas, which could serve to weaken academic standards and teacher certification requirements. These murky changes could have significant negative repercussions on the future of students and communities in New Hampshire.

All learning opportunities outside the traditional public school classroom, such as remote learning, should be rigorously evaluated, monitored and tested, and held accountable to the same education and reporting standards and teacher-certification requirements. If deemed appropriate, the costs of remote learning should be examined and set for each individual's need, not to exceed a specific limit.

The document should leave no doubt in anyone's mind that the state must provide and fund quality education for every student.

Strong public schools are an investment in the future of our students, communities and the nation. The standards for education and our public schools must be robust, honest and inclusive. Without a strong foundation, inequities between districts and students could grow significantly.

Thank you so much for giving your time, talents and energy in service to our community and state.

Sincerely,
Linda Terwilliger

[Redacted signature block]

Sent from [Mail](#) for Windows

From: [Shelley Westenberg](#)
To: [Adams, Angela](#)
Subject: Ed 306 Minimum Standards
Date: Monday, April 1, 2024 12:18:46 PM

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Dear N.H. State Board of Education:

As a N.H. parent and public school employee, I am imploring you to please adopt Ed 306 Minimum Standards for Public Approval that include the following:

- Definitions informed by peer-reviewed academic studies.
- Language and definitions that advance CBE and support ongoing CBE efforts by providing a framework for local decisions, continued growth, and innovation.
- Language and definitions that ensure equitable access to a wide range of engaging educational opportunities.
- Language and definitions that ensure high standards and quality programming for students and teachers.
- A minimum number of high school courses that ensure all approved schools are required to offer NH's students with diverse choices in their academic journeys that provide them with new learning experiences, spark their personal passion for continuous learning, help shape and inform future plans, and provide the required course of study for a NH high school diploma.
- Class sizes that assist districts in creating budgets, allocating resources (personnel and supplies), and crafting schedules where students are able to receive personalized, supportive, engaging, expert, and diverse learning.

Please respect and listen to the voices from the field, the public, and members of the 306 work groups. Your adoption of the Ed 306 Minimum Standards for Public Schools Approval is significant to keeping NH as a highly ranked state overall and for Pre-K – 12 public education. Standards that create inequities, remove choices, lower quality, de-value trained and licensed teachers, and are not informed by peer-reviewed research should not be considered.

Respectfully,

Shelley Westenberg

[Redacted signature block]

From: [Tia Winter](#)
To: [Shea, Julie](#); [Adams, Angela](#); [Lilian Maughan](#); [Mary Edes](#); [John D'Entremont](#)
Subject: Public Comment of Lebanon School Board
Date: Wednesday, April 3, 2024 9:29:19 AM

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Hello Julie and Angela,

Due to the storm, members of the Lebanon School Board will not be able to attend today's hearing in-person. We are providing you with our public comment regarding the topic of today's meeting to submit electronically.

[LSB Public Comment re: 306 Minimum Standards Draft](#)

Thank you for your time with this.

--

Tia Winter
she/her/hers
School Board Member

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Wednesday, March 20, 2024

To the New Hampshire State Board of Education:

We, the Lebanon School Board, are opposed to the latest proposed revisions to the Ed 306 minimum standards, made public on February 15, 2024. We continue to have significant concerns with both the process and substance of the draft as currently proposed.

In regards to our concerns over the process, the LSB is dismayed by both the lack of transparency and incorporation of community feedback. The LSB recognizes and appreciates the many listening sessions led by Fred Bramante that have been held throughout the state of New Hampshire. We are also appreciative of the numerous and thoughtful educator feedback/input sessions led by Christine Downing. Unfortunately, the current draft does not include satisfactory response to the legitimate and detailed concerns and feedback provided by these statewide sessions. Furthermore, the LSB is curious why the January 22nd revisions, which had more broad community support and arose out of the listening sessions, have not yet been released to the public.

The LSB would like to take this opportunity to outline our largest concerns over the content of the current proposed draft:

1. The LSB notes with apprehension that in the current draft, career and technical education and digital literacy education continue to be mandated (eg “An approved CTE program shall include”) while the component parts or program elements of all other subjects have been made optional (eg “English Language Arts and Reading Curriculum...which may include”). Because these changes in language are clearly selective, the LSB has concerns that these changes weaken the definition of all other academic and elective subjects. We note that these changes will dilute all content areas outside career and technical education and digital literacy, thereby diluting what constitutes an adequate education in the state of New Hampshire.
2. We also strongly protest the potential negative impact on local taxpayers if the state does not identify and mandate rigorous minimum educational standards which include all the program elements previously included in the minimum standards.
3. We are concerned that the requirements for elementary schools to offer certified art, music, and physical education have been removed.
4. We question the wisdom of removing all references to “certified” educators, which we worry will open the door for less-qualified teachers in New Hampshire classrooms.
5. We worry that the removal of class size maximums potentially puts undue stress on New Hampshire certified educators and contradicts years of research about the benefits of smaller class sizes.
6. We have strong misgivings about the removal of the word “local” with reference to school board control throughout the proposed revisions, which potentially puts local education decision-making in New Hampshire at risk. As proposed, the current draft removes references to local competencies, local graduation requirements, and local assessments, all hallmarks of locally-directed education in the state.
7. We object to the removal of the word “equity” throughout the proposed revisions. This change removes protections to ensure fairness for all students regardless of race, gender, or other protected class.
8. We further object to the removal of requirements for differentiated student support. This contradicts with the state’s movement toward competency-based learning. Differentiated student support provides students more ownership and autonomy of their learning while connecting to their personal interests and passions, enhances local control of education, and makes assessments more meaningful due to its ongoing and formative nature.

The Lebanon School Board wants to thank the New Hampshire State Board of Education for taking the time to consider our concerns and insights. We hope to see an updated draft that includes community support and the educator feedback that has been provided around the state of New Hampshire. We believe doing so will ultimately pave a pathway to minimum educational standards that benefit all New Hampshire students.

Sincerely,

The Lebanon School Board

From: [katheen r allen](#)
To: [Adams, Angela](#)
Subject: students
Date: Sunday, March 31, 2024 8:05:33 PM

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Dear Angela,

This Wednesday decision will ? be made on education here in New Hampshire. We want high standards for each and every student here in our state. Why educate to a lesser degree and not allow each student to follow their goals in life?

Thank you,

Kathleen R. Allen

[REDACTED]

Peterborough, NH 03458

From: [Adams, Angela](#)
To: [Jennifer Beaudet](#)
Subject: RE: Maintain High Standards in Public Education
Date: Tuesday, April 23, 2024 3:49:12 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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-----Original Message-----

From: Jennifer Beaudet [REDACTED]
Sent: Tuesday, April 2, 2024 11:43 AM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: Maintain High Standards in Public Education

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Dear State Board of Education,

I am writing to express my strong concerns regarding the potential amendment and reduction of NH 306 standards for public education. As a concerned citizen, I urge the State Board of Education to prioritize and protect these standards for the betterment of our education system in New Hampshire.

It is crucial that we maintain high standards in public education to ensure that our students receive

the quality education they deserve. Any efforts to diminish these standards would have a detrimental impact on the future of our students and the overall education system in our state, and would diminish property values while grossly increasing property taxes in some communities.

I implore you to take action to safeguard NH 306 Standards and prevent any reduction of these essential benchmarks. Our students' success and the integrity of our education system depend on it.

Thank you for your attention to this urgent matter. I trust that you will do everything in your power to uphold and protect our public education standards.

Sincerely,
Jennifer Beaudet
Goffstown, NH

From: [L Beelle](#)
To: [Adams, Angela](#)
Subject: Keep 306 Standards High
Date: Monday, April 1, 2024 11:12:19 AM

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Ms Adams, please pass on to the board that NH must keep the 306 Standards high and NOT lower them. It's best for all students!

Thank you, Lisa

Lisa Beelle
Concord NH

From: [Adams, Angela](#)
To: [Bridey Bellemare](#)
Subject: RE: Testimony for tomorrow's SBOE hearing
Date: Tuesday, April 23, 2024 3:49:34 PM
Attachments: [Testimony.SBOE Hearing.4.2.24\(2\).pdf](#)
[image001.png](#)
[image003.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12.

Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
25 Hall Street, Concord NH 03301
Email: angela.m.adams@doe.nh.gov



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From: Bridey Bellemare [REDACTED]
Sent: Tuesday, April 2, 2024 12:08 PM
To: Adams, Angela <Angela.M.Adams@doe.nh.gov>
Cc: David Levesque [REDACTED]
Subject: Testimony for tomorrow's SBOE hearing

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Hello Angela,

I hope this correspondence finds you well.

I have attached written testimony that I would like entered into the public record for tomorrow's SBOE hearing on the 306 Rules.

I do hope to be able to attend in person to testify...weather pending

Thank you for your assistance and I hope you have a wonderful afternoon.

Respectfully,
Bridey



Bridey Bellemare
Executive Director
New Hampshire Association of School Principals
bbellemare@nhasp.org
office: 1-603-225-3431
cell: 1-603-620-5797



April 2, 2024

Esteemed members of the New Hampshire State Board of Education,

New Hampshire has long been recognized as a top-performing state in public education, consistently surpassing the national average in various national education assessments. This achievement speaks to our unwavering commitment to educational excellence and the invaluable efforts of our educators, administrators, and policymakers.

According to the National Assessment of Educational Progress (NAEP), or the Nation's Report Card, New Hampshire consistently outperforms the national average in reading and mathematics across all grade levels. These results reflect the effectiveness of our highly qualified educators, our robust educational system, and the positive impact it has on our students' academic achievement.

Moreover, New Hampshire has established itself as an innovative leader in education. Our state has embraced rigorous educational practices, incorporating technology and experiential learning into the curriculum to enhance student engagement and foster critical thinking skills. The New Hampshire Department of Education has long been instrumental in implementing milestone initiatives that support innovation and personalized learning, through the development of Extended Learning Opportunities and Competency Based Education. These approaches have empowered educators to tailor instruction to meet the unique needs of each student.

One notable example is the Competency-Based Education (CBE) model, which shifts the focus from seat time to the mastery of skills and knowledge. This approach encourages deeper learning and ensures that students are adequately prepared for success in college and their careers. The CBE model has gained national attention and serves as a guiding light for other states seeking to transform their education systems. We have been successful in our implementation of CBE because the Department of Education has enabled local school districts to clearly define what the competencies are and how they will be measured, assessed and implemented. New Hampshire is widely regarded as a leader in this realm.

Considering the information outlined above, it seems counterintuitive that the Department of Education is proposing a lowering of the minimum standards for public education. The term 'minimum' already implies the least possible amount, degree, or quality, and the phrase 'less than minimum' suggests a lower quality than what is expected. Local school districts will be forced to accept credits which they believe represent inadequate and sub-standard competencies through private vendors. Are we truly prepared to accept this "low-quality learning" as the new standard for our students?

In conclusion, there is ample evidence to support the claim that New Hampshire consistently delivers an exceptional public education. The data clearly indicates that we are among the highest-performing states in the nation, consistently achieving outstanding results in national assessments.

Furthermore, our state's commitment to innovation and personalized learning has positioned us as a leader in educational practices for decades. Through our unwavering dedication to providing equitable opportunities for all students, we are shaping the future and empowering the next generation of leaders, thinkers, and innovators. This is the caliber of public education that our students deserve. "Less than minimum" should never be an acceptable standard.

Respectfully Submitted,

Bridey Bellemare

Bridey Bellemare

Executive Director, NHASP

From: [Adams, Angela](#)
To: [Cheryl Berman](#)
Subject: RE: Ed 306 review testimony for April 2 & 11 meetings
Date: Tuesday, April 23, 2024 3:49:21 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator

New Hampshire Department of Education
Office of the Commissioners

Phone: 603-271-3144

25 Hall Street, Concord NH 03301

Email: angela.m.adams@doe.nh.gov



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Department of Education

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From: Cheryl Berman <[REDACTED]>
Sent: Monday, April 1, 2024 1:39 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: Ed 306 review testimony for April 2 & 11 meetings

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April 1, 2024

RE: Upcoming Public hearing April 2 and 11, 2024 of the NHDOE Ed 306 Administrative Rules for Public School Approval and changes to the Minimum Standards for Public School Approval.

Dear Angela Adams:

My name is Cheryl Berman and I am a NH state World Language Educator who resides in Rockingham County. I am writing to urge you to review the comments and suggested wording submitted by Christine Downing per the educator review sessions. Close to 300 certified teachers reviewed these proposed changes and have put forth their testimony.

Here are just a few concerns that the New Hampshire World Language Educators would like to share with you in hopes that you will revise these Rules and support a full scope for an inclusive and competent public education program.

1. Reducing student electives from 6 to 2.5 is a danger and detriment to students and educators
2. Removal of career ed. programs will have a large impact on hundreds of students statewide.
3. Alternative courses of study: needs review to maintain quality curriculum and instruction.

We as educators have deep concerns regarding: Requirements vs expectations, Rhetoric like may vs shall, Program vs curriculum , Student right to choose electives , Removal of class size capping , Local vs State control , Defining Adequate Education, ALL students to have a Personal Learning Plan (PLP), Accountability.

Sincerely,
Cheryl Berman

[Redacted signature block]

From: [Adams, Angela](#)
To: [Beverly Boggess](#)
Subject: RE: 306 Rules Minimum Standards for Public School Approval: Public Commentary
Date: Monday, April 29, 2024 10:22:52 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12.

Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Beverly Boggess [REDACTED]
Sent: Sunday, April 28, 2024 11:06 AM
To: Shea, Julie <Julie.R.Shea@doe.nh.gov>; Adams, Angela <Angela.Adams@doe.nh.gov>; Edelblut, Louis (Frank) <Frank.Edelblut@doe.nh.gov>
Subject: 306 Rules Minimum Standards for Public School Approval: Public Commentary

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Greetings Ms. Shea, Ms. Adams and Commissioner Edelblut,

I am writing in response to the proposed changes to the "306 Rules," the Minimum Standards for Public School Approval. I do not support these changes.

As a special educator and teacher educator for over 45 years, I strongly believe in the opportunity for free public education for all students. This requires continued attention to the quality of teachers and staff working with students. Watering down standards will not accomplish the delivery of the quality educational experiences that our students deserve.

In keeping with the reservations expressed by the nonpartisan organization Reaching Higher NH, I have strong concerns about the proposed rules. I do not agree with removing guidance for safe and inclusive schools for all, privatizing learning, diluting credits, and removing supports for students. I do not understand how these changes would lead to schools having the necessary resources to support students and traversing routes to lifelong learning. I do not believe that these changes will "ensure that every student receives a meaningful, rigorous, and engaging, educational experience."

It is a reasonable expectation that the Commissioner and State Board of Education fulfill their duties responsibly and ethically to uphold best practices and standards to deliver excellent educational experiences to all New Hampshire children and youth. It is vital to put the needs of our children and youth ahead of personal aspirations and political agendas. Siphoning off public resources and dismantling structures in favor of promoting private choices is not a balanced, appropriate approach. Furthermore, in my professional and personal opinion, such practices put the future of our children and youth at further risk. Our children and youth should have access to high-quality educational experiences as our shared vision and priority.

Thank you for considering my perspectives and taking public commentary seriously. It is my fervent hope that you will reconsider these proposed changes to the 306 Rules in favor of providing a more balanced, fair and equitable approach.

Best regards, Respectfully,
Beverly W. Boggess, Ph.D.

Sent from my iPhone

From: [Pammy D.](#)
To: [Adams, Angela](#)
Subject: Protect NH Education Standards
Date: Monday, April 1, 2024 6:44:02 PM

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Dear State Board of Education.

I am writing to express my strong concerns regarding the potential amendment and reduction of NH 306 standards for public education. As a concerned citizen, I urge the State Board of Education to prioritize and protect these standards for the betterment of our education system in New Hampshire.

It is crucial that we maintain high standards in public education to ensure that our students receive the quality education they deserve. Any efforts to diminish these standards would have a detrimental impact on the future of our students and the overall education system in our state as well as diminishing property values while grossly increasing the property taxes in some communities.

I implore you to take action to safeguard NH 306 Standards and prevent any reduction of these essential benchmarks. Our students' success and the integrity of our education system depend on it.

Thank you for your attention to this urgent matter. I trust that you will do everything in your power to uphold and protect our public education standards.

Sincerely,
Pam Boyer
Goffstown, NH

From: [Angela Broscoe](#)
To: [Adams, Angela](#)
Subject: Rule 306
Date: Monday, April 1, 2024 2:50:58 PM

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I am in favor of keeping Rule 306. Changes that would lower the Adequate standards and the value of the education our children now receive should not be considered. Education is the right of each and every New Hampshire student., and should not depend on where that student lives.

Angela Broscoe
Paraprofessional
Profile School
691 Profile Road
Bethlehem, NH 03574

From: [Adams, Angela](#)
To: [Jessica Caron](#)
Subject: RE: NH should NOT want lower educational standards
Date: Tuesday, April 23, 2024 3:48:17 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: Jessica Caron [REDACTED]
Sent: Tuesday, April 2, 2024 12:24 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: NH should NOT want lower educational standards

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Dear State Board of Education.

I am writing to express my strong concerns regarding the potential amendment and reduction of NH 306 standards for public education. As a concerned citizen, I urge the State Board of Education to prioritize and protect these standards for the betterment of our education system in New Hampshire. As it stands today, the educational standards are honestly not enough - reducing them is unimaginable.

It is crucial that we maintain high standards in public education to ensure that our students receive the quality education they deserve. Any efforts to diminish these standards would have a detrimental impact on the future of our students and the overall education system in our state as well as diminishing property values while grossly increasing the property taxes in some communities.

I implore you to take action to safeguard NH 306 Standards and prevent any reduction of these essential benchmarks. Our students' success and the integrity of our education system depend on it.

Thank you for your attention to this urgent matter. I trust that you will do everything in your power to uphold and protect our public education standards.

Sincerely,

Jessica Caron
Goffstown, NH

From: [Dean Cascadden](#)
To: [Adams, Angela](#)
Subject: My Testimony for the 306 rules
Date: Tuesday, April 2, 2024 11:28:42 AM
Attachments: [603 testimony.pdf](#)

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Hi Angela,

Here is my written testimony for the hearing tomorrow. I hope to speak alaso.

Testimony for ED 603 Rules hearing

Dean S.T. Cascadden, Meredith NH

I am a lifelong NH resident and I love NH Public Education.

I graduated from Littleton High School in 1979, attended Dartmouth College and began a career in the Upper Valley in both private and public schools. I have experienced high end private education, frugal Faith based schools and local public schools in the North Country, the Lakes Region, the Upper Valley and the Capital Region. NH public schools are locally controlled and locally funded mostly by property tax leading to wide variation in educational opportunity.

In my experience the local public school is the hub for our communities. We cheer on our children in sports and activities, we gather at them when tragedy strikes, and we rely on them to transmit our cultural values and educate the future generations of citizens.

When the government funds a public good, like education, it is imperative that it is distributed equitably and without discrimination. In theory, public Schools are committed to equitable access to an adequate education for all students everywhere. In my experience, NH public schools have worked towards that ideal.

Property valuation is unevenly distributed, and it is fundamentally an inequitable way to fairly fund a common good. This has been known and litigated in NH since 1993 when the original Claremont decision mandated the legislature to define an adequate education, cost it out and then to fund it in an equitable way across communities in NH. That has never happened and the present day Rand and Conval Lawsuits attest to this continued failure.

The legislature makes laws known as RSAs and the state school board promulgates rules known as ED's. The practical basis of defining and costing an adequate education is a set of educational rules known as the ED 306's. Rules should support and implement Laws, not legislate on their own. Presently the courts have ruled the amount of money the state of NH provides per student is inadequate, but the 306 rules were used to attempt to bring equity to an inherently unfair system. Students in rich towns have abundance of opportunities, while students in poor towns struggle to have basic educational needs met. However, there was always the "minimum standards" that could be referenced to ensure a base level of services and opportunities for all regardless of zip code.

The present inadequate and inequitable funding splits communities and municipalities often have controversy surrounding hard decisions pitting town services like fire and police against supporting schools. Other communities have adopted SB 2 and default budgets that further starve services. I have worked in a variety of places with traditional town meetings and with deliberative sessions. I have worked in Cooperative SAUs where poor and rich towns fight over

funding and what is fair, tinkering with formulas involving per pupil ADM vs property valuation involving Equalized Valuation.

The system is broken.

The State Board of Education in the last few years has responded to these issues by bypassing localities and sending money directly to individual consumers via the vouchers called EFAs and other programs. The state board has spent much of its time promoting charter schools and other options for school choice, but has not addressed the fundamental issues of equity for public schooling. The revision of the 306 rules has not been transparent and has focused on issues such as competencies that are not critical to the core issues of equitable funding.

I am retiring and I am tired. This cost avoidance dance has been going on too long.

I am tired of fighting culture wars about library books, and Divisive Concepts. I am tired of fighting discrimination against women, against non-white citizens, against those who are non-conforming to identity and orientation norms. I am tired of fighting for fair and equitable resources for all our students. I have worked hard to ensure equitable treatment and access for all and leading schools that do not discriminate on the basis of sex, gender, orientation, disability, national origin, ethnicity or economic status.

I have tried to speak my truth to power in legislative and board hearings. The NH I grew up in was "Live Free or Die," we respected Liberty and others freedom to be, think and act. We came together, despite our differences, and collaborated to solve problems. I now see partisan politics and extreme individualism dominating our discussions. It is often us against them and win at all costs. However, it seems our students are the losers.

For me, education is not a private commodity, but rather a public good. I believe that Public Education is the economic driver of our prosperity. We celebrate and support ALL who are in our community and we distribute our resources equally so that each student has an equitable opportunity for an adequate education. No student should be marginalized because each has value to contribute to our future.

The Ed 306 rules will not solve our inequitable funding issues, but the present drafts have the potential for making it worse. I urge the board to listen to the feedback provided by educators and citizens, and not destroy or weaken the Minimum Standards that have been critical to our communities in providing an equitable and adequate education.

I love NH public Education, but I fear for its future. We have always had exceptional, locally controlled public schools accountable to their citizens, but that can be lost when our state government tries to mandate programs and content instead of ensuring adequacy of opportunity for all. The ED 306 rules should flesh out how local communities can provide the opportunity for an adequate and equitable education for all students.

From: [kate coon](#)
To: [Adams, Angela](#)
Subject: Proposed changes to standards
Date: Monday, April 1, 2024 9:49:49 PM

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Dear members of the State Board of Education,

I have been a teacher and educational administrator for more than 40 years, in both public and private schools; a New Hampshire resident for the last ten. I have two beloved grandchildren in New Hampshire's public elementary schools, and I am very involved in my town.

The changes that you are about to consider are extremely misguided and, I think, dangerous to this state. You are weakening the foundation of what should be rigorous, clear, bedrock responsibilities of a universal education system. Not to be cynical, but it seems to "enable" the systematic undercutting of the financial stability of our schools. Pushing vouchers (proving to be quite the budget buster!), contesting true adequacy funding, slowly (or for some towns, not slowly at all) starving state aid to property-tax-hurting towns, and now watering down the standards in place to provide a strong baseline of expectation is unacceptable.

I urge you not to go down that road.

Kate Coon
Peterbrough, NH

April 1st, 2024

New Hampshire State Board of Education
25 Hall Street
Concord, NH 03301

To the State Board of Education:

I am writing to express concern regarding the current draft of revisions to the minimum standards for public education in New Hampshire. I urge the State Board of Education to direct that further revisions be undertaken and that these revisions incorporate the feedback from communities, families, and educators around the state.

In brief, my concerns include:

Process Concerns: The current draft does not address the concerns expressed by educators, families, and communities in recent weeks. Feedback from “listening sessions” and educator forums has not been reflected in the revisions thus far. Drafts developed in conjunction with educators in January have not been brought forth publicly for consideration. The latest version of the proposed revisions was released publicly just today, April 1st, providing inadequate time for educators and communities to review and respond in advance of the Board’s meeting on April 3rd.

Content Concerns: Many educators, school boards, community members, and professional organizations in the state have already enumerated concerns regarding content shifts. I share these concerns, in particular regarding the lowering of rigor in the program requirements for most content areas, the elimination of several requirements in elementary schools, the removal of requirements for certified teachers, and the erosion of local authority. These shifts lower the standards for schools, teachers, and students.

At a minimum, significant shifts such as these should be presented transparently with an accompanying evidence-based rationale, so that families, communities, and educators can understand why significant changes are being undertaken and have the opportunity to see the peer-reviewed research that informed the shifts. No such research- and evidence-based rationale has been provided to explain these concerning content changes.

Again, I urge the Board to direct that further revisions take place before approval of the draft of the Ed 306 standards. We share a common goal to ensure that all New Hampshire students receive an excellent education that will equip them for the future. Thank you for taking the time to consider these concerns.

Sincerely,



Karen DuBois

District Director of Equity, Curriculum, Instruction, and Assessment
Lebanon School District (SAU #88)

From: [Adams, Angela](#)
To: [Alicia flammia](#)
Subject: RE: Don't gut NH's 306 Standards
Date: Tuesday, April 23, 2024 3:48:28 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: Alicia flammia [REDACTED]
Sent: Tuesday, April 2, 2024 12:15 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: Don't gut NH's 306 Standards

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Hello Angela,
NH students deserve higher educational standards not lower educational standards. This attempt to drive down our schools' standards is a race to the bottom. It's pretty hard to overcome educational impoverishment and this is what the proposed 306 changes would do. I believe in local school control but I also believe that some school districts are too short sighted to think long term about student welfare over the course of that student's educational journey. And it is usually in the poorer districts that local boards want to gut our student's educational offerings in order to save money. Please add my comments to the record, noting that the NH Educational Board should be focused on lifting all students up to the same level playing field rather than racing to gut standards.
Sincerely,

Alicia Flammia
Walpole NH resident

From: [Kim Frye](#)
To: [Shea, Julie](#)
Subject: 306 Rules
Date: Monday, April 29, 2024 8:43:44 PM

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Hi Julie,

I am writing in regards to the proposed changes to the 306 Rules. These changes will water down educational requirements, threaten the NEASC accreditation of the public schools, and cause further inequities in the education system beyond what already exists.

Furthermore, with the change in requirements, it seems likely that there will be reduced funding from the state to the public schools. If maximum class sizes are no longer required, and if specific coursework is no longer required, then it is likely that the state will no longer consider these as part of the adequate education that the state constitution mandates. This will impact the base adequacy rate and in turn the amount of money schools receive from the state.

Finally, during this revision process, teachers were largely left out of the process. As one of the key stakeholders, it is unjustifiable that the 306 Rules should be changed without any input from them.

I am against the proposed changes to the 306 Rules.

Thanks,
Kim Frye

From: [Maria Gendron](#)
To: [Adams, Angela](#)
Subject: 306 standards
Date: Tuesday, April 2, 2024 10:38:35 AM

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Hello Angela,
Thank you for working on behalf of our NH schools!

I am very concerned about the move to change the 306 standards for NH students. As a taxpayer in my town and as an educator, we need to continue high standards so that students will have access to quality education by certified teachers, preparing them for their futures!

Lowering the expectations will lower our students chances of getting into college or being prepared for a variety of job opportunities.

It is already difficult to find enough certified teachers to fill the openings left by retiring teachers and teachers who are leaving the profession due to the rise in dangerous behaviors demonstrated regularly by students. Lowering standards will lower the qualify of education.

Instead, the DOE should be looking at what can be done to curb the outrageous behaviors being displayed in schools and the lack of consequences that teachers could impose. Our hands have been tied and the behaviors keep increasing. Provide the resources we need to provide for all students!

Thank you very much,
Maria Gendron
Bennington, NH

From: [SHARON GIGLIO](#)
To: [Adams, Angela](#)
Subject: 306
Date: Saturday, March 30, 2024 11:32:05 AM

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I **do not support** the changes being considered. I disapprove of the NH Dept of Ed making any changes to lower the quality of education in our public schools. Further, the state needs to provide more financial support to school districts so that our children can continue to receive the education which they deserve and is their right!
Sharon Giglio, Board of Education Nashua

[REDACTED]
Nashua NH 03062

From: [Emily Ginsberg](#)
To: [Adams, Angela](#)
Subject: Re NH 306
Date: Tuesday, April 2, 2024 11:12:01 AM

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Dear State Board of Education.

I am writing to express my strong concerns regarding the potential amendment and reduction of NH 306 standards for public education. As a concerned citizen and former teacher, I urge the State Board of Education to prioritize and protect these standards for the betterment of our education system in New Hampshire.

It is crucial that we maintain high standards in public education to ensure that our students receive the quality education they deserve. Any efforts to diminish these standards would have a detrimental impact on the future of our students and the overall education system in our state as well as diminishing property values while grossly increasing the property taxes in some communities.

I implore you to take action to safeguard NH 306 Standards and prevent any reduction of these essential benchmarks. Our students' success and the integrity of our education system depend on it.

Thank you for your attention to this urgent matter. I trust that you will do everything in your power to uphold and protect our public education standards.

Sincerely,
Emily LaVoy, M.Ed
Goffstown, NH

Sent from my iPhone

From: [Mary Beth](#)
To: [Adams, Angela](#)
Subject: 306 Minimum Standards for Public School Approval
Date: Monday, April 1, 2024 4:53:47 PM

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Ms. Adams,

I am writing to let my opinion be known to the State School Board. I want high standards for all NH students. I am asking the State School Board to stop the attempt to gut our Stop the attempt to gut our 306 standards.

I would like my opinion entered into the record.

Sincerely,
Mary E. Goodell,

[REDACTED]

--

Mary E. Goodell, M.Ed.

[REDACTED]

From: [Isabelle](#)
To: [Adams, Angela](#)
Subject: 306 rules
Date: Saturday, March 30, 2024 8:09:28 PM

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Dear Ms. Adams,
Please note that I am against the changes currently being considered to the current 306 Rules.

Sincerely,
Isabelle Grenier
Bedford, NH Resident

From: [Hinesley, Michael](#)
To: [Adams, Angela](#)
Subject: Ed 306 Hearing
Date: Monday, April 1, 2024 10:56:05 AM

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Please do NOT move forward with any changes that would lower the expectations of NH students. Please do NOT move forward with any changes that would reduce the qualifications of instructors. Please do NOT allow the use of private companies' curriculum such as Prager.

Thank you

--



Michael Hinesley
Digital Learning Specialist
Chesterfield School, Chesterfield, NH
[Prepare the child for the path,
not the path for the child.](#)

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From: [Cheryl Houston](#)
To: [Adams, Angela](#)
Subject: Education standards
Date: Tuesday, April 2, 2024 8:21:31 AM

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Good morning. I'm writing to you with concerns regarding our NH children's education. The proposed changes will lower the quality of education for all children in the state. Children are our future; they will care for us when we are old; they will hopefully run businesses and governments. Stripping education to less than the bare minimums does not serve the goal of providing excellent education to our next generation of citizens. Instead, education funding should be increased to provide children with the resources they need to move forward into their future and to become educated citizens.

All the Best
Cheryl Houston


Sent from my iPad

From: [Kathy Hubert](#)
To: [Adams, Angela](#)
Subject: I oppose the proposed changes to the 306 rules
Date: Friday, March 29, 2024 8:14:57 PM

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Dear NH Board of Education,

My name is Kathy Hubert, I am a NH native and reside in Newport. I am appalled at the proposed changes to the 306 rules. The NH constitution states that NH children should be afforded an adequate State education. An adequate education as defined in the constitution and interpreted by the Claremont 2 decision is “Mere competence in the basics-reading, writing, and arithmetic- is insufficient in the waning days of the twentieth century to ensure that this State’s public schools students are fully integrated into the world around them. A broad exposure to the social, economic, scientific, technological, and political realities of today’s society is essential for our students to compete, contribute, and flourish in the twenty-first century.” - Claremont II, 143 NH at 474. The development of these rules as evident by the lack of a transparent process without participatory integration of educational professional is intentionally trying to negate our constitutional right to the latter. I believe the rules as amended will only exasperate the injustices of school opportunities between NH communities and conveniently allow the State to back into a cost of per pupil adequacy that will bankrupt local communities that have low property values. Yet, most importantly it will rob many NH children of an adequate opportunity to a competitive education by lowering the standards to the least common denominator. Please do not pass these new rules, the governing board of NH’s education system can and should do better.

Sincerely,

Kathy Hubert



Newport NH 03773

From: [Catharine Hyson](#)
To: [Adams, Angela](#)
Subject: ED 306 Written Testimony
Date: Sunday, March 31, 2024 9:41:46 PM

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I would like my statement below to be included as written public testimony regarding the revisions to ED 306. Thank you.

Historically, regulations have played a crucial role in upholding quality and safety standards for the public. In the proposed revisions to 306 standards these assurances have been eroded. The students of New Hampshire deserve to be guaranteed a public education that provides them the skills and knowledge to be contributing citizens.

In the proposed revisions, all academic areas have changed language from "...*shall require* that ___ program in each school *provides...*" to "*shall provide* ___ curriculum in each school, consistent with competencies determined pursuant to ED 306.24, *which may include...*" This effectively makes any of the academic content listed after "may include" optional. Imagine that the regulations for car manufacturers were revised from being "required to provide" brakes to "may include" brakes. This small change in language has a large impact.

Minimum standards set a basic level that we need to require for the benefit of all New Hampshire students and not leave it up to individual districts which core content to teach.

Here are some of the areas currently *required* by ED 306 standards that only *may be included* with the proposed standards:

- "Opportunities for all students to build and construct knowledge and understanding of mathematical concepts through developmentally appropriate activities"
- "Course offerings in each of the following areas in physics, biology, chemistry, earth space science, physical science."
- "Instruction in history and government and the constitutions of the United States and New Hampshire."
- "Opportunities for each child to become literate"

If this language is changed then a school that does *not* offer "opportunities for each child to become literate" would still be meeting the minimum standards. These changes to ED 306

are a step backwards. The students of our state deserve a guarantee of access to the fundamentals of an education. In order for the minimum standards to set a true baseline it needs to keep the language “shall require a ____ program which provides...”

I encourage all those involved in the revision of the ED 306 minimum standards to ensure a systematic review from educators in their designated fields and incorporation of their informed revisions. I urge you to push for minimum standards that guarantee no student in New Hampshire is deprived of the essential elements of a public education.

Catharine Hyson
Warner, NH

From: [Nate Jones](#)
To: [Adams, Angela](#)
Subject: 306 hearing input
Date: Sunday, March 31, 2024 10:55:24 AM

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Hi Ms. Adams,

I am writing regarding the upcoming hearings on the NHED 306 updates. I want to strongly encourage the state board to maintain a high minimum standard of education for students in NH. I am a school psychologist in our state and work with many students who are in many ways only kept on track by the reality imposed by the minimum standards. Without the pressure of the standards on the districts and the students, many of these students would not end up receiving a similar level of education.

Please maintain the minimum standards for our students. Without them, I fear too many school districts will not provide our students that education they need to be successful in their chosen paths and our state will not have the workforce we need to thrive.

Thank you,
Nate Jones

Nathaniel Jones, PhD
NH Licensed Psychologist & School Psychologist
Brentwood, NH

From: [R & D Lengyel](#)
To: [Adams, Angela](#)
Subject: revising minimum standards
Date: Monday, April 1, 2024 9:27:47 AM

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I cannot understand why the minimum standards for the public school curriculum are being revised without teacher input. Aren't the teachers constantly using the curriculum in the classroom and wouldn't it be important for them to help tell the committee what they feel should be revised? Unless the committee is in the classroom frequently throughout the school year consulting with the teachers, it just doesn't make sense for only them to make these decisions. Dorene Lengyel, former teacher

From: [Sara Lewis](#)
To: [Adams, Angela](#)
Subject: opposition to changing 306 standards on April 3rd
Date: Monday, April 1, 2024 3:00:44 PM

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Hi Angela,

I've recently become aware of some of the 306 standards that are considering being changed at the DOE on Wednesday, April 3rd and I'm very disappointed and concerned. Please do not let us go backwards in history and lower the standards for education, create even more divisions and inequities amongst students with lower access to high-quality education, and take away students' protections from discrimination and bias. Especially when our neighbors in Vermont are doing just the opposite -- increasing funding to put MORE money toward students who have been historically marginalized and discriminated against.

Please hear educators' voices and their lack of support for these changes.

Thank you so much,

Sara Lewis

--

Sara Lewis
Music Teacher
Josiah Bartlett Elementary School
(Mon/Tues/Thurs)
(603) 374-2331

Interim Principal
Pine Tree Elementary School
(Wed/Fri)
(603) 447-2882

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From: [Susan Moore](#)
To: [Adams, Angela](#)
Cc: [Shea, Julie](#); [REDACTED]; [Kate Harrington Segal](#); [Christina Pretorius](#)
Subject: Public Comment for ED 306 Hearing on April 3, 2024
Date: Friday, March 29, 2024 2:03:07 PM

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Public Comment for ED 306 Hearing on April 3, 2024

The proposed changes to the minimum standards for New Hampshire public schools will dilute, undermine, and severely weaken the current standards. If these changes are implemented, public school students will not receive an adequate education. This will negatively impact New Hampshire's economy. Businesses will not want to open offices or factories here. Young people will not want to move here. Our public school graduates will have a difficult time seeking higher educational opportunities, whether technical, academic, or in the arts, because they won't have the required skills and background.

This is not acceptable! My grandchildren do not deserve this!

Susan Moore
Franconia, New Hampshire

From: [Sarah Murray](#)
To: [Adams, Angela](#)
Subject: NH 306 Rules
Date: Monday, April 1, 2024 12:19:12 PM

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Good afternoon, I would like to just say I am opposed to the changes that are being presented in the Rule 306 changes. We as educators should never reduce our expectations and requirements for our students and teachers. If we do not hold everyone to the highest standards we will be failing our children, our state and our future.

Thank you for your attention to this matter.

--

Sarah Murray M.ED

Digital Learning Specialist

Dunbarton Elementary School

From: [Ken Page](#)
To: [Adams, Angela](#)
Subject: Please Add My Name to the Record
Date: Monday, April 1, 2024 11:04:42 AM

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Dear Angela,

It has been some time since I was the Interim Director of NHASP (2018-19). So, I would be surprised if you remember me. However, I remember you, and I must say that I enjoyed working with you for this interim period.

I was a teacher, principal and Executive Director of the Vermont Principals' Association for most of my 45+ years in Education. So, I believe that I have a unique two-state perspective when it comes to adopting performance standards.

It is ironic that I began my career as a teachers at Lebanon Jr. High school in 1973, and that my career would come full circle back to NH in my retirement. I currently serve as the Mentor Coordinator for the NH Principals' Association where we support nearly 50 new school leaders. I also write this as a resident of Dublin, NH where our community has sadly taken up the mantle of dising public education, and are looking into ways to separate itself from the ConVal SAU.

I am opposed to any attempts to weaken standards or to favor to private or charter schools by lessening the standards. I have seen this in Vermont and it has failed miserably. One only has to look at public schools who went private in Vermont to see that a lessening of standards has created an inadequate education for many already-disadvantaged students and their families. I question when and why the NH State Board of Education has stopped trusting its trained and licensed teachers and why it would turn its back on its education partners by not listening to them now.

So, I urge the State Board of Education to adopt the ED. 306 Minimum Standards for Public Approval as written. Thanks for considering this.

Ken Page

[Redacted signature block]

Mentoring/Coaching Coordinator
New Hampshire Association of School Principals
kpage@nhasp.org

From: [Bill Palmer](#)
To: [Shea, Julie](#)
Cc: Angrla.Adams@doe.nh.gov
Subject: ED 306 Rules
Date: Tuesday, April 30, 2024 7:54:58 AM

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To whom it may concern,

I am a former Cornish School Board Chair and currently represent Sullivan District 2 in the New Hampshire House and am very disappointed in the process that seems to have discounted input from many of the stakeholders who know education. I keep hearing that New Hampshire has such good public schools but what I fear, with these proposed rules, the EFA accounts, and lack of public school funding, is a significant decline in public education at a time when an excellent education is essential to our children's future.

My daughter and son in law were planning to move back to New Hampshire but are now thinking Vermont is more likely to support education as well as human rights. I hope the commission will reconsider these rules and listen to their constituents.

Sincerely,

Rep. William Palmer

Sullivan District 2

Sent from my iPhone

From: [Betsey Phillips](#)
To: [Adams, Angela](#)
Cc: [Shea, Julie](#)
Subject: 306 rules
Date: Tuesday, March 26, 2024 5:38:42 PM

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Dear Angela,

It is distressing to me to read of the plans to re-write the rules that have traditionally supported the rigorous education available to New Hampshire's students. This latest watered down (dumbed down?) version is an embarrassment to our state.

Aside from the fact that we have a commissioner who has no background in education, whoever is responsible for these new rules is clearly doing the bidding of Edelblut and his out of state backers, ALEC? the Koch family? Betsy DeVos? The Free Staters? and doing their best to destroy public education in New Hampshire.

Please enter my statement into the record for the April 3rd hearing on the 306 rules.

Thank you,

Betsey Phillips

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

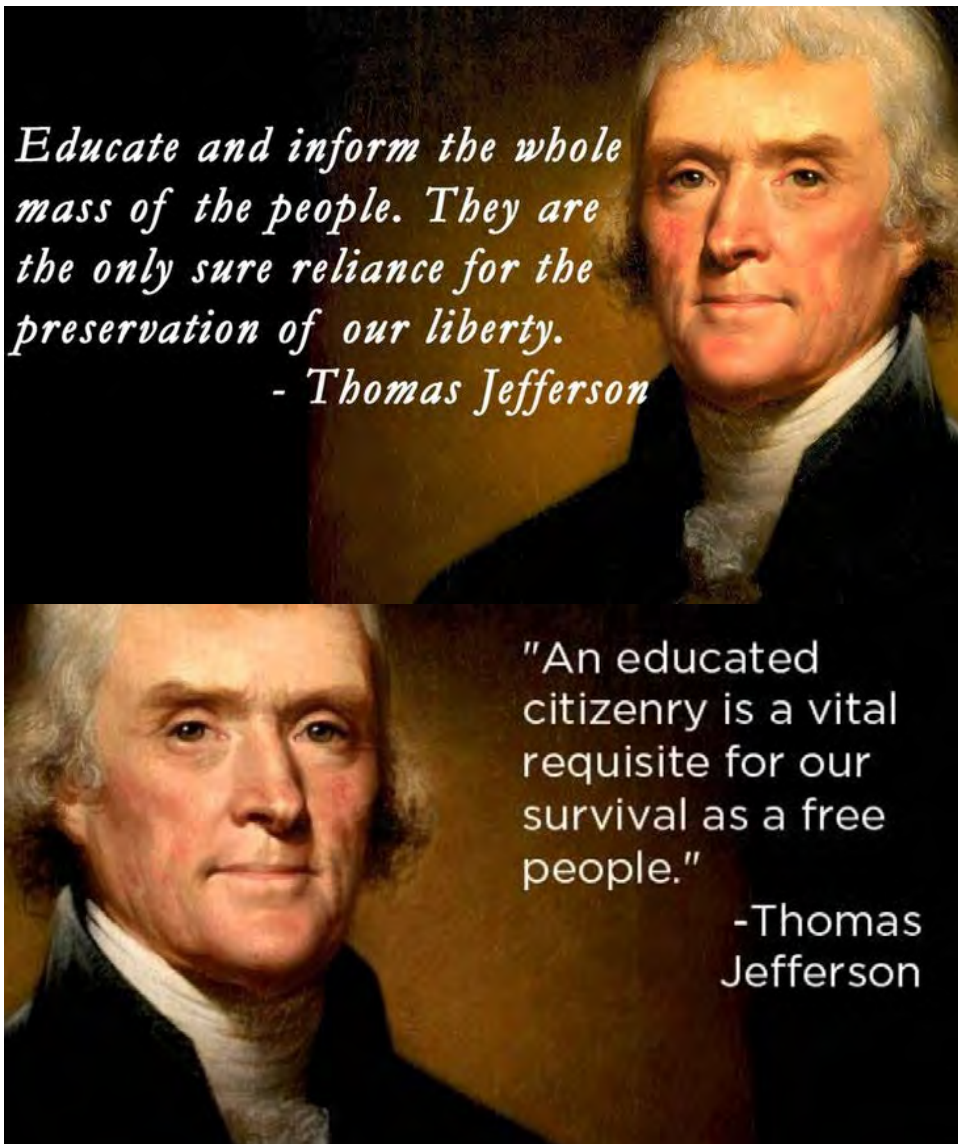
" We control our destiny by the actions we take—not by the amount of worry we invest in the outcome." Robert Hubbell

From: [Roark, Erin](#)
To: [Adams, Angela](#)
Subject: Stop gutting 306 standards
Date: Monday, April 1, 2024 11:40:46 AM
Attachments: [image.png](#)
[image.png](#)

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Dear Angela,

I am saddened to hear that our beautiful state is considering taking equity out of public education. Please relay to the judges of this decision that I oppose the gutting to the 306 standards. If you want to cut tax dollars, then stop giving public money to private schools. We need to keep these minimum standards in public education.



Cordiales Saludos,

Erin Roark

"Intelligence plus character- that is the goal of true education."- Martin Luther King Jr.

Environmental awareness message

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From: [Kimberly Sell](#)
To: [Adams, Angela](#)
Subject: NH 306 Rules
Date: Monday, April 1, 2024 2:03:47 PM

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Hello Angela,

I am writing to you to express my opinion against NH 306 Rules changes. Please do not approve the recommendations for changes to these rules. We need high standards for our students, not lower standards that make educating our students even harder. We also do not need any more funds passed on to the taxpayers. The State seems to enjoy underfunding school districts as it is, we don't need to be reminded of the unfairness yet again. I do not understand how the state government feels good about claiming to be a "Tax-Free" state when it is the state government's fault that the property taxes are so high. I make it a point to inform people in other states about the farse that is "NH, the tax-free state."

Please do not approve the new changes to the NH 306 Rules!

--

Kimberly Sell
Administrative Assistant
Temple Elementary School

"To appreciate the beauty of a snowflake it is necessary to stand out in the cold." – Aristotle

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From: EBS
To: Adams, Angela
Subject: Re: 306, state department of ed.
Date: Tuesday, April 2, 2024 7:07:24 AM

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Angela,

My partner Allison and I have two children that attend KA Brett school in Tamworth nh and one child that attends northeast woodland charter school in North Conway nh.

We absolutely DO NOT want this proposal to pass. We do not want inequity between different schools. We want opportunity for a high quality of education state wide.

Sincerely
Evan Shangraw and Allison Drew

On Mon, Apr 1, 2024 at 5:03 PM SAU13 (TAMWORTH) [REDACTED] wrote:

A message from SAU13 (TAMWORTH)

Dear Brett School Families,

Please take a moment to watch the following video. This 3 minute video explains what is at stake for the future of public education in NH. On 4/3, the State Board of Education is debating on educational standards. What they choose to put forth will have a significant impact on the education of the students of NH.

If you are interested, you could attend this week's State Board of Ed hearing to advocate on behalf of our students. Your attendance and participation is welcome. You do not have to testify to be present. However, your voices and the stories you have from the field would be powerful if shared. Together, our voices are stronger. Together, we can defend the integrity of New Hampshire's public schools.

<https://vimeo.com/928162908>

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To view the SAU13 (TAMWORTH) privacy policy, please [click here](#).

From: [Edelblut, Louis \(Frank\)](#)
To: [Shea, Julie](#)
Subject: FW: 306 revisions
Date: Wednesday, April 3, 2024 9:04:34 AM

Frank Edelblut | Commissioner
New Hampshire Department of Education

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From: Andrew Shurman [REDACTED]
Sent: Wednesday, April 3, 2024 9:03 AM
Subject: 306 revisions

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As a long time resident of nh, I look forward to supporting a well educated populace, prepared for the rigors and demands of modern life. Weakening standards by enlarging class sizes or lowering teacher education requirements will only hinder achieving positive outcomes. Moreover, changing "shall" to "may " in the 306 rules is a disingenuous way to undermine the State's obligations to its youth. Shame on you!

Signed, T Andrew Shurman

From: [Erin Sweeney](#)
To: [Adams, Angela](#)
Subject: ED 306
Date: Tuesday, April 2, 2024 8:20:10 AM

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Hello Angela,

I want my written testimony to be part of the public record in regard to proposed changes to the ED 306 rules for minimum standards for NH schools. I am a high school teacher who taught through the pandemic. What I learned from that is that all "learning opportunities" are not created equal. Please do not replace "courses" with "learning opportunities," for there is no substitute for good teachers and their carefully designed courses. Many students can not learn from online courses, especially "self-guided" courses without a live teacher. We already have Extended Learning Opportunities built into our school program, and we do not need to replace our high standards for the content areas with vague and unregulated "learning opportunities."
Thank you,



From: [Liz Tentarelli](#)
To: [Adams, Angela](#)
Subject: 306 administrative rules
Date: Monday, April 1, 2024 3:43:35 PM

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To the NH State Board of Education

From Liz Tentarelli, Newbury NH

The weather forecast for Wednesday prevents me from attending the public hearing on the 306 rules. Here is testimony I would have given.

The members of the state board of education are beholden to the students and schools of New Hampshire, not to the Commissioner of Education. It was your responsibility to see that these revised rules were developed with input from teachers, school administrators, experts in curriculum development and educational theory. Allowing an untrained commissioner, with no personal commitment to public education except that it pays his salary, to develop these standards on his own, disregarding those developed by a consultant (and that process was not without its flaws), is failing to do your duty.

You have the opportunity to turn down these suggestions and instead hire a consulting firm to begin anew, with clear instructions to consult with experts and the school personnel most involved. If you rubber-stamp Mr. Edelblut's plan you are voting to weaken NH's school expectations for learning. By removing the current standards you harm students that may move from district to district because curriculum is no longer standardized among schools. "Learning opportunities" has to be the most weasel-y part of this, clearly based on Mr. Edelblut's allegiance to commercial instructional programs over professionally developed courses and programs in the public schools

Competency based education is being used successfully by many schools, my district of Kearsarge included. These proposed standards leave assessing competency up in the air.

If a diploma from a NH high school is to stand for anything, you need to discard these vague 306 standards and start anew, with expert and professional input from those who will use them to teach. Remember where your responsibility lies: with the schools and the students, not with Mr. Edelblut.

From: [Laura Vincent](#)
To: [Shea, Julie](#)
Subject: 306 Rules Hearing
Date: Tuesday, April 2, 2024 5:30:51 PM

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As a long time school board member with familiarity with the minimum standards since the early 1990s revision , I am concerned about many of the changes being proposed. Students deserve an opportunity to be actually instructed by someone with knowledge in the subject area and teaching skills, not just notification of learning opportunities available. Students deserve to receive instruction in many different areas, not just ELA, math, science, and social studies. Students also deserve to be in classes with numbers of students small enough that they are recognized as individuals and receive teaching tailored to their needs.

Thank you,
Laura Vincent

From: [Thomas Meredith](#)
To: [Shea, Julie](#)
Subject: 306 minimum school standards
Date: Monday, April 29, 2024 5:03:33 PM

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Sirs: I am deeply concerned that the 306 rules revision as currently construed will severely weaken state educational standards, rather than strengthening them. I am also concerned that it will be another step towards avoiding providing an adequate public education for places like the Berlin-Milan area, where I live. I think it is particularly important to hire teachers who have been certified and to not have unlimited class sizes. I also think that it is of critical importance to strengthen our public school system- not proceed along a path to privatizing it.
Sincerely, Laurie Wunder, Milan, NH

From: [Fredrick Bramante](#)
To: [Edelblut, Louis \(Frank\)](#); [Andrew Cline](#); [Nathan Harris](#); [Val Zanchuk](#); [Robert McLaughlin](#); [Shea, Julie](#); [Brown, Elizabeth](#); [Irv Richardson](#); [Mark MacLean](#); [Megan Tuttle](#)
Cc: [Houghton, Kimberly C](#)
Subject: Fwd: Latest Draft of the 306s
Date: Tuesday, April 2, 2024 10:24:58 AM

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This note from Elizabeth Cardine is what I hoped for and expect from folks who understand and care about CBE. Some of you may know Elizabeth and MC2 which was started by former NH Teacher of the Year Kim Carter. Kim was also part of the original group that brought us the EDies. Kim was also a part of Dr. Bob's Summiteers who brought us the 2010 Educator Preparation for the 21st Century conference at SNHU, maybe the best of its kind our state has seen. Elizabeth has been doing CBE for a long time at a level among the highest quality in NH. When I chaired the state board Paul Leather used to show off MC2 as what education could become. I have spoken about my experience at MC2's Graduation Gateway all around the country.

Just my thoughts, Fred
----- Forwarded message -----

From: **elizabeth cardine** <elizabeth.cardine@mc2school.org>
Date: Tue, Apr 2, 2024 at 9:55 AM
Subject: Re: Latest Draft of the 306s
To: Fredrick Bramante <fbramante@nccbl.org>

The proposed draft for the new minimum standards for public schools are a welcome continuation of the cutting-edge work New Hampshire is doing to provide a truly competency-based education for all young learners. We here at the Making Community Connections Charter School have developed, promoted, and prototyped competency-based learning for almost 20 years (originally as part of the Monadnock Community Connections Charter School) and while the work is challenging, it is certainly beneficial to our diverse learning population. During and post-COVID, schools have had to adapt to more personalized and creative approaches to recognizing and rewarding learning, and these regulations will help all educators prepare our graduates to be informed, active, and empowered citizens.

On Tue, Apr 2, 2024 at 9:38 AM Fredrick Bramante <fbramante@nccbl.org> wrote:
Elizabeth, please just send it to me and I will make sure that it gets to the right place.
Thanks, Fred
Sent from my iPhone

On Apr 2, 2024, at 8:35 AM, elizabeth cardine <elizabeth.cardine@mc2school.org> wrote:

Thanks, Fred, this was great to get to review with you. Do you have a link to a website I can use to provide testimonials about these proposals?

On Mon, Apr 1, 2024 at 9:57 AM Fredrick Bramante <fbramante@nccbl.org> wrote:

This is the latest draft of the 306s which will be brought forward on April 3rd at the Department of Education. It was agreed upon by Team 306 #2 which included NEA President Megan Tuttle, Irv Richardson, NHSAA Ex.Director Dr. Mark MacLeam, Bob McLaughlin, Nate Harris and me working with Commissioner Edelblut, and Chairman of the State Board Drew Cline. There are still some pieces to be worked on including Class Size and the curriculum areas in the back of the document. I feel very good about where we are at this point. I'm confident that this is going to be a great document when completed. That said, if anyone has ideas to make the document better, please let us know.

I want to thank all of you for your involvement, whether it was just encouragement, or advice, or direct involvement. This effort has been the most inclusive process in the history of the 306 combined! We're almost there.

Fred

--

Fred Bramante, President
NATIONAL CENTER FOR COMPETENCY-BASED LEARNING

--

Fred Bramante, President
NATIONAL CENTER FOR COMPETENCY-BASED LEARNING

From: [Adams, Angela](#)
To: [Melissa St Pierre](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:34:19 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Melissa St Pierre <bounce@list.granitestateprogress.org>
Sent: Tuesday, April 23, 2024 5:53 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

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As a New Hampshire resident who wants the highest quality public schools, I am concerned about the current draft of the 306 Rules revision. All students need access to public schools where they can learn, grow, and thrive.

Specifically, I am concerned about draft changes that:

Lower academic standards, by changing “programs” and “courses” to “learning opportunities.”

Lower the value of teaching by replacing “teaching” with “facilitated learning,” removing the responsibility of certified educators to approve students’ demonstration of competency and pushing students toward online learning options that do not allow for a teacher to check work and answer questions.

Remove local decision-making to determine how courses, credits, and other elements lead to a diploma, instead “ensuring” that learning opportunities lead to graduation even if they lack

rigor.

Establish law through rulemaking by using language changes to strip requirements for academic content areas, making more content optional through shifting language from “shall” to “may.”

Instead, the 306 Rules should:

Include equity and student protections, including requirements that guarantee opportunity for all students and rules that create safe, supportive, and nurturing learning environments.

Restore program elements to ensure that school boards and school leaders have the framework they need to build robust, comprehensive learning programs that are responsive to student needs.

Empower local leaders and schools and allow school districts to design high-quality local competencies that align with state academic standards. Update state academic standards so that all students, regardless of place, are taught the same core fundamental skills and knowledge.

Raise standards for students and teachers by removing language that dilutes and privatizes learning, and instead recenter high-quality instruction and materials and institute consistent, clear, and actionable rules by establishing definitions of key terms.

I urge you to re-approve the current 306 Rules, then revisit the editing process and make updates as necessary. The 306 rules already in existence do a fine job of helping schools run at present. Reverting to the existing language and being more intentional with the editing process by making sure we have qualified educators, parents, and other stakeholders helping to write and approve the updated rules is a crucial step forward in giving the public and school leaders confidence in the results– and above all, ensuring high standards and opportunities for every student.

We all benefit from high quality public education, and I am counting on you to advocate for every New Hampshire public school student by listening to these concerns.

Sincerely,

Melissa St Pierre
Warner, NH

From: [Adams, Angela](#)
To: [Charles Rhoades](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:32:35 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

The contents of this message are confidential. Any unauthorized disclosure, reproduction, use or dissemination (either whole or in part) is prohibited. If you are not the intended recipient of this message, please notify the sender immediately and delete the message and any attachments from your system.

From: Charles Rhoades <bounce@list.granitestateprogress.org>
Sent: Tuesday, April 23, 2024 6:53 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

As a retired public-school teacher and parent whose children benefitted greatly from NH public schools, I am extremely concerned about the reduction in standards being proposed in the 306 Rules.

Lowering our standards in this day and age is unconscionable, short-sighted, and just plain foolish.

This weakening of our public schools seems to me to be part of a national campaign by extremists to dismantle one of the cornerstones of our democracy.

I urge you to dismantle these proposed changes.

Sincerely,

Charles Rhoades

Charles Rhoades

Dover, NH

From: [Adams, Angela](#)
To: [Barbara Ann Mee](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:36:03 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Barbara Ann Mee <bounce@list.granitestateprogress.org>
Sent: Tuesday, April 23, 2024 5:25 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

As a New Hampshire resident who wants the highest quality public schools, I am concerned about the current draft of the 306 Rules revision. All students need access to public schools where they can learn, grow, and thrive.

Specifically, I am concerned about draft changes that:

Lower academic standards, by changing “programs” and “courses” to “learning opportunities.”

Lower the value of teaching by replacing “teaching” with “facilitated learning,” removing the responsibility of certified educators to approve students’ demonstration of competency and pushing students toward online learning options that do not allow for a teacher to check work and answer questions.

Remove local decision-making to determine how courses, credits, and other elements lead to a diploma, instead “ensuring” that learning opportunities lead to graduation even if they lack

rigor.

Establish law through rulemaking by using language changes to strip requirements for academic content areas, making more content optional through shifting language from “shall” to “may.”

Instead, the 306 Rules should:

Include equity and student protections, including requirements that guarantee opportunity for all students and rules that create safe, supportive, and nurturing learning environments.

Restore program elements to ensure that school boards and school leaders have the framework they need to build robust, comprehensive learning programs that are responsive to student needs.

Empower local leaders and schools and allow school districts to design high-quality local competencies that align with state academic standards. Update state academic standards so that all students, regardless of place, are taught the same core fundamental skills and knowledge.

Raise standards for students and teachers by removing language that dilutes and privatizes learning, and instead recenter high-quality instruction and materials and institute consistent, clear, and actionable rules by establishing definitions of key terms.

I urge you to re-approve the current 306 Rules, then revisit the editing process and make updates as necessary. The 306 rules already in existence do a fine job of helping schools run at present. Reverting to the existing language and being more intentional with the editing process by making sure we have qualified educators, parents, and other stakeholders helping to write and approve the updated rules is a crucial step forward in giving the public and school leaders confidence in the results– and above all, ensuring high standards and opportunities for every student.

We all benefit from high quality public education, and I am counting on you to advocate for every New Hampshire public school student by listening to these concerns.

Sincerely,

Barbara Ann Mee
Londonderry, NH

From: [Adams, Angela](#)
To: [Leigh Prince](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:32:25 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Leigh Prince <bounce@list.granitestateprogress.org>
Sent: Tuesday, April 23, 2024 6:56 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Please do not water down our public education system with the proposed language changes to Ed 306. As a New Hampshire resident I am proud of the education my children have gotten and as a school board member want to maintain the highest quality public schools for future generations, I am concerned about the current draft of the 306 Rules revision. All students need access to public schools where they can learn, grow, and thrive.

Specifically, I am concerned about draft changes that:

Lower academic standards, by changing “programs” and “courses” to “learning opportunities.”

Lower the value of teaching by replacing “teaching” with “facilitated learning,” removing the responsibility of certified educators to approve students’ demonstration of competency and pushing students toward online learning options that do not allow for a teacher to check work and answer questions.

Remove local decision-making to determine how courses, credits, and other elements lead to a diploma, instead “ensuring” that learning opportunities lead to graduation even if they lack rigor.

Establish law through rulemaking by using language changes to strip requirements for academic content areas, making more content optional through shifting language from “shall” to “may.”

Instead, the 306 Rules should:

Include equity and student protections, including requirements that guarantee opportunity for all students and rules that create safe, supportive, and nurturing learning environments.

Restore program elements to ensure that school boards and school leaders have the framework they need to build robust, comprehensive learning programs that are responsive to student needs.

Empower local leaders and schools and allow school districts to design high-quality local competencies that align with state academic standards. Update state academic standards so that all students, regardless of place, are taught the same core fundamental skills and knowledge.

Raise standards for students and teachers by removing language that dilutes and privatizes learning, and instead recenter high-quality instruction and materials and institute consistent, clear, and actionable rules by establishing definitions of key terms.

I urge you to re-approve the current 306 Rules, then revisit the editing process and make updates as necessary. The 306 rules already in existence do a fine job of helping schools run at present. Reverting to the existing language and being more intentional with the editing process by making sure we have qualified educators, parents, and other stakeholders helping to write and approve the updated rules is a crucial step forward in giving the public and school leaders confidence in the results– and above all, ensuring high standards and opportunities for every student.

We all benefit from high quality public education, and I am counting on you to advocate for every New Hampshire public school student by listening to these concerns.

Sincerely,
Leigh Prince

Leigh Prince
Lyme, NH

From: [Adams, Angela](#)
To: [Denise M Clark](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:32:14 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Denise M Clark <[REDACTED]>
Sent: Tuesday, April 23, 2024 7:11 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

As a New Hampshire resident who wants the highest quality public schools, I am concerned about the current draft of the 306 Rules revision. All students need access to public schools where they can learn, grow, and thrive.

Specifically, I am concerned about draft changes that:

Lower academic standards, by changing “programs” and “courses” to “learning opportunities.”

Lower the value of teaching by replacing “teaching” with “facilitated learning,” removing the responsibility of certified educators to approve students’ demonstration of competency and pushing students toward online learning options that do not allow for a teacher to check work and answer questions.

Remove local decision-making to determine how courses, credits, and other elements lead to a diploma, instead “ensuring” that learning opportunities lead to graduation even if they lack

rigor.

Establish law through rulemaking by using language changes to strip requirements for academic content areas, making more content optional through shifting language from “shall” to “may.”

Instead, the 306 Rules should:

Include equity and student protections, including requirements that guarantee opportunity for all students and rules that create safe, supportive, and nurturing learning environments.

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Empower local leaders and schools and allow school districts to design high-quality local competencies that align with state academic standards. Update state academic standards so that all students, regardless of place, are taught the same core fundamental skills and knowledge.

Raise standards for students and teachers by removing language that dilutes and privatizes learning, and instead recenter high-quality instruction and materials and institute consistent, clear, and actionable rules by establishing definitions of key terms.

I urge you to re-approve the current 306 Rules, then revisit the editing process and make updates as necessary. The 306 rules already in existence do a fine job of helping schools run at present. Reverting to the existing language and being more intentional with the editing process by making sure we have qualified educators, parents, and other stakeholders helping to write and approve the updated rules is a crucial step forward in giving the public and school leaders confidence in the results— and above all, ensuring high standards and opportunities for every student.

We all benefit from high quality public education, and I am counting on you to advocate for every New Hampshire public school student by listening to these concerns.

Sincerely,

Denise M Clark
Milford, NH

From: [Adams, Angela](#)
To: [Tiffany Gagnon](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:32:07 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Tiffany Gagnon <bounce@list.granitestateprogress.org>
Sent: Tuesday, April 23, 2024 7:13 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

As a New Hampshire resident who wants the highest quality public schools, I am concerned about the current draft of the 306 Rules revision. All students need access to public schools where they can learn, grow, and thrive.

Specifically, I am concerned about draft changes that:

Lower academic standards, by changing “programs” and “courses” to “learning opportunities.”

Lower the value of teaching by replacing “teaching” with “facilitated learning,” removing the responsibility of certified educators to approve students’ demonstration of competency and pushing students toward online learning options that do not allow for a teacher to check work and answer questions.

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rigor.

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Empower local leaders and schools and allow school districts to design high-quality local competencies that align with state academic standards. Update state academic standards so that all students, regardless of place, are taught the same core fundamental skills and knowledge.

Raise standards for students and teachers by removing language that dilutes and privatizes learning, and instead recenter high-quality instruction and materials and institute consistent, clear, and actionable rules by establishing definitions of key terms.

I urge you to re-approve the current 306 Rules, then revisit the editing process and make updates as necessary. The 306 rules already in existence do a fine job of helping schools run at present. Reverting to the existing language and being more intentional with the editing process by making sure we have qualified educators, parents, and other stakeholders helping to write and approve the updated rules is a crucial step forward in giving the public and school leaders confidence in the results– and above all, ensuring high standards and opportunities for every student.

We all benefit from high quality public education, and I am counting on you to advocate for every New Hampshire public school student by listening to these concerns.

Sincerely,

Tiffany Gagnon
Londonderry, NH

From: [Adams, Angela](#)
To: [Sherri Averill](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:31:59 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Sherri Averill <bounce@list.granitestateprogress.org>
Sent: Tuesday, April 23, 2024 7:15 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

As a New Hampshire resident who wants the highest quality public schools, I am concerned about the current draft of the 306 Rules revision. All students need access to public schools where they can learn, grow, and thrive.

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rigor.

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Instead, the 306 Rules should:

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I urge you to re-approve the current 306 Rules, then revisit the editing process and make updates as necessary. The 306 rules already in existence do a fine job of helping schools run at present. Reverting to the existing language and being more intentional with the editing process by making sure we have qualified educators, parents, and other stakeholders helping to write and approve the updated rules is a crucial step forward in giving the public and school leaders confidence in the results– and above all, ensuring high standards and opportunities for every student.

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Sincerely,

Sherri Averill
Plaistow, NH

From: [Adams, Angela](#)
To: [Erik Anderson](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:31:48 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Erik Anderson <[REDACTED]>
Sent: Tuesday, April 23, 2024 7:22 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

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As a New Hampshire resident who wants the highest quality public schools, I am concerned about the current draft of the 306 Rules revision. All students need access to public schools where they can learn, grow, and thrive.

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Sincerely,

Erik Anderson
Harrisville, NH

From: [Adams, Angela](#)
To: [Gale Toale Taylor](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:31:40 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

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Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Gale Toale Taylor [REDACTED]
Sent: Tuesday, April 23, 2024 7:23 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

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As a New Hampshire resident who wants the highest quality public schools, I am concerned about the current draft of the 306 Rules revision. All students need access to public schools where they can learn, grow, and thrive.

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Sincerely,

Gale Toale Taylor
Concord, NH

From: [Adams, Angela](#)
To: [Wiltrud R. Mott-Smith](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:31:32 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Wiltrud R. Mott-Smith <bounce@list.granitestateprogress.org>
Sent: Tuesday, April 23, 2024 7:24 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

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As a New Hampshire resident who wants the highest quality public schools, I am concerned about the current draft of the 306 Rules revision. All students need access to public schools where they can learn, grow, and thrive.

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We all benefit from high quality public education, and I am counting on you to advocate for every New Hampshire public school student by listening to these concerns.

Sincerely,

Wiltrud R. Mott-Smith
Loudon, NH

From: [Adams, Angela](#)
To: [Sandy Steel](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:31:10 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Sandy Steel <bounce@list.granitestateprogress.org>
Sent: Tuesday, April 23, 2024 7:25 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

As a New Hampshire resident who wants the highest quality public schools, I am concerned about the current draft of the 306 Rules revision. All students need access to public schools where they can learn, grow, and thrive.

Specifically, I am concerned about draft changes that:

Lower academic standards, by changing “programs” and “courses” to “learning opportunities.”

Lower the value of teaching by replacing “teaching” with “facilitated learning,” removing the responsibility of certified educators to approve students’ demonstration of competency and pushing students toward online learning options that do not allow for a teacher to check work and answer questions.

Remove local decision-making to determine how courses, credits, and other elements lead to a diploma, instead “ensuring” that learning opportunities lead to graduation even if they lack

rigor.

Establish law through rulemaking by using language changes to strip requirements for academic content areas, making more content optional through shifting language from “shall” to “may.”

Instead, the 306 Rules should:

Include equity and student protections, including requirements that guarantee opportunity for all students and rules that create safe, supportive, and nurturing learning environments.

Restore program elements to ensure that school boards and school leaders have the framework they need to build robust, comprehensive learning programs that are responsive to student needs.

Empower local leaders and schools and allow school districts to design high-quality local competencies that align with state academic standards. Update state academic standards so that all students, regardless of place, are taught the same core fundamental skills and knowledge.

Raise standards for students and teachers by removing language that dilutes and privatizes learning, and instead recenter high-quality instruction and materials and institute consistent, clear, and actionable rules by establishing definitions of key terms.

I urge you to re-approve the current 306 Rules, then revisit the editing process and make updates as necessary. The 306 rules already in existence do a fine job of helping schools run at present. Reverting to the existing language and being more intentional with the editing process by making sure we have qualified educators, parents, and other stakeholders helping to write and approve the updated rules is a crucial step forward in giving the public and school leaders confidence in the results– and above all, ensuring high standards and opportunities for every student.

We all benefit from high quality public education, and I am counting on you to advocate for every New Hampshire public school student by listening to these concerns.

Sincerely,
Sandy Steel

Sandy Steel
PLAINFIELD, NH

From: [Adams, Angela](#)
To: [Ronald E Brown](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:34:11 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Ronald E Brown <bounce@list.granitestateprogress.org>
Sent: Tuesday, April 23, 2024 5:57 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Attending a high school with rigorous standards and dedicated, caring teachers paved the way for me to attend selective colleges for my Bachelors and Masters degrees. This in turn led to a 40 year career in high tech. The foundation of my career was public education. I don't take that for granted and I hope the NH BoE doesn't take public education for granted by weakening the minimum standards.

As a New Hampshire resident who wants the highest quality public schools, I am concerned about the current draft of the 306 Rules revision. All students need access to public schools where they can learn, grow, and thrive.

Specifically, I am concerned about draft changes that:

Lower academic standards, by changing “programs” and “courses” to “learning opportunities.”

Lower the value of teaching by replacing “teaching” with “facilitated learning,” removing the

responsibility of certified educators to approve students' demonstration of competency and pushing students toward online learning options that do not allow for a teacher to check work and answer questions.

Remove local decision-making to determine how courses, credits, and other elements lead to a diploma, instead "ensuring" that learning opportunities lead to graduation even if they lack rigor.

Establish law through rulemaking by using language changes to strip requirements for academic content areas, making more content optional through shifting language from "shall" to "may."

Instead, the 306 Rules should:

Include equity and student protections, including requirements that guarantee opportunity for all students and rules that create safe, supportive, and nurturing learning environments.

Restore program elements to ensure that school boards and school leaders have the framework they need to build robust, comprehensive learning programs that are responsive to student needs.

Empower local leaders and schools and allow school districts to design high-quality local competencies that align with state academic standards. Update state academic standards so that all students, regardless of place, are taught the same core fundamental skills and knowledge.

Raise standards for students and teachers by removing language that dilutes and privatizes learning, and instead recenter high-quality instruction and materials and institute consistent, clear, and actionable rules by establishing definitions of key terms.

I urge you to re-approve the current 306 Rules, then revisit the editing process and make updates as necessary. The 306 rules already in existence do a fine job of helping schools run at present. Reverting to the existing language and being more intentional with the editing process by making sure we have qualified educators, parents, and other stakeholders helping to write and approve the updated rules is a crucial step forward in giving the public and school leaders confidence in the results— and above all, ensuring high standards and opportunities for every student.

We all benefit from high quality public education, and I am counting on you to advocate for every New Hampshire public school student by listening to these concerns.

Sincerely,

Ronald E Brown
WILTON, NH

From: [Adams, Angela](#)
To: [William and Wendy Thomas](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:29:22 AM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator

New Hampshire Department of Education

Office of the Commissioners

Phone: 603-271-3144

25 Hall Street, Concord NH 03301

Email: angela.m.adams@doe.nh.gov



The contents of this message are confidential. Any unauthorized disclosure, reproduction, use or dissemination (either whole or in part) is prohibited. If you are not the intended recipient of this message, please notify the sender immediately and delete the message and any attachments from your system.

From: William and Wendy Thomas <bounce@list.granitestateprogress.org>
Sent: Tuesday, April 23, 2024 7:29 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

As a resident of Auburn, NH, and as a retired teacher who wants the highest quality public schools, I am concerned about the current draft of the 306 Rules revision. All students in NH need access to public schools where they can learn, grow, and thrive.

My wife and I, both former educators, are deeply concerned about draft changes that:

Lower academic standards, by changing “programs” and “courses” to “learning opportunities.”

Lower the value of teaching by replacing “teaching” with “facilitated learning,” removing the responsibility of certified educators to approve students’ demonstration of competency and pushing students toward online learning options that do not allow for a teacher to check work

and answer questions.

Remove local decision-making to determine how courses, credits, and other elements lead to a diploma, instead “ensuring” that learning opportunities lead to graduation even if they lack rigor.

Establish law through rulemaking by using language changes to strip requirements for academic content areas, making more content optional through shifting language from “shall” to “may.”

Instead, the 306 Rules should:

Include equity and student protections, including requirements that guarantee opportunity for all students and rules that create safe, supportive, and nurturing learning environments.

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Empower local leaders and schools and allow school districts to design high-quality local competencies that align with state academic standards. Update state academic standards so that all students, regardless of place, are taught the same core fundamental skills and knowledge.

Raise standards for students and teachers by removing language that dilutes and privatizes learning, and instead recenter high-quality instruction and materials and institute consistent, clear, and actionable rules by establishing definitions of key terms.

I urge you to re-approve the current 306 Rules, then revisit the editing process and make updates as necessary. The 306 rules already in existence do a fine job of helping schools run at present. Reverting to the existing language and being more intentional with the editing process by making sure we have qualified educators, parents, and other stakeholders helping to write and approve the updated rules is a crucial step forward in giving the public and school leaders confidence in the results– and above all, ensuring high standards and opportunities for every student.

We all benefit from high quality public education, and I am counting on you to advocate for every New Hampshire public school student by listening to these concerns.

Sincerely,

William and Wendy Thomas
Auburn, NH

From: [Adams, Angela](#)
To: [Debra Rodd](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:29:14 AM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator

New Hampshire Department of Education

Office of the Commissioners

Phone: 603-271-3144

25 Hall Street, Concord NH 03301

Email: angela.m.adams@doe.nh.gov



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From: Debra Rodd <bounce@list.granitestateprogress.org>

Sent: Tuesday, April 23, 2024 7:33 PM

To: Adams, Angela <Angela.Adams@doe.nh.gov>

Subject: Concerns around 306 Rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

As a New Hampshire resident who wants the highest quality public schools, I am concerned about the current draft of the 306 Rules revision. All students need access to public schools where they can learn, grow, and thrive.

Specifically, I am concerned about draft changes that:

Lower academic standards, by changing “programs” and “courses” to “learning opportunities.”

Lower the value of teaching by replacing “teaching” with “facilitated learning,” removing the responsibility of certified educators to approve students’ demonstration of competency and pushing students toward online learning options that do not allow for a teacher to check work

and answer questions.

Remove local decision-making to determine how courses, credits, and other elements lead to a diploma, instead “ensuring” that learning opportunities lead to graduation even if they lack rigor.

Establish law through rulemaking by using language changes to strip requirements for academic content areas, making more content optional through shifting language from “shall” to “may.”

Instead, the 306 Rules should:

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Raise standards for students and teachers by removing language that dilutes and privatizes learning, and instead recenter high-quality instruction and materials and institute consistent, clear, and actionable rules by establishing definitions of key terms.

I urge you to re-approve the current 306 Rules, then revisit the editing process and make updates as necessary. The 306 rules already in existence do a fine job of helping schools run at present. Reverting to the existing language and being more intentional with the editing process by making sure we have qualified educators, parents, and other stakeholders helping to write and approve the updated rules is a crucial step forward in giving the public and school leaders confidence in the results– and above all, ensuring high standards and opportunities for every student.

We all benefit from high quality public education, and I am counting on you to advocate for every New Hampshire public school student by listening to these concerns.

Sincerely,
Debra Rodd

Debra Rodd
Amherst, NH

From: [Adams, Angela](#)
To: [Doreen Desmarais](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:35:50 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Doreen Desmarais <bounce@list.granitestateprogress.org>
Sent: Tuesday, April 23, 2024 5:30 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

As a New Hampshire resident who wants the highest quality public schools, I am concerned about the current draft of the 306 Rules revision. All students need access to public schools where they can learn, grow, and thrive.

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rigor.

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We all benefit from high quality public education, and I am counting on you to advocate for every New Hampshire public school student by listening to these concerns.

Sincerely,

Doreen Desmarais
Northwood, NH

From: [Adams, Angela](#)
To: [Brenda Diederich](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:35:43 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Brenda Diederich <bounce@list.granitestateprogress.org>
Sent: Tuesday, April 23, 2024 5:32 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

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As a New Hampshire resident who wants the highest quality public schools, I am concerned about the current draft of the 306 Rules revision. All students need access to public schools where they can learn, grow, and thrive.

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Sincerely,

Brenda Diederich
Bristol, NH

From: [Adams, Angela](#)
To: [Janice Kelble](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:35:30 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator

New Hampshire Department of Education
Office of the Commissioners

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From: Janice Kelble <bounce@list.granitestateprogress.org>
Sent: Tuesday, April 23, 2024 5:38 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

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Sincerely,

Janice Kelble

,

From: [Adams, Angela](#)
To: [Jennifer LeBlanc](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:34:54 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Jennifer LeBlanc <bounce@list.granitestateprogress.org>
Sent: Tuesday, April 23, 2024 5:44 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

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Sincerely,

Jennifer LeBlanc
Lebanon, NH

From: [Adams, Angela](#)
To: [Ingrid M Markman](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:34:43 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Ingrid M Markman [REDACTED]
Sent: Tuesday, April 23, 2024 5:48 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

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As a New Hampshire resident who wants the highest quality public schools, I am concerned about the current draft of the 306 Rules revision. All students need access to public schools where they can learn, grow, and thrive.

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We all benefit from high quality public education, and I am counting on you to advocate for every New Hampshire public school student by listening to these concerns.

Sincerely,
Ingrid Markman
Registered Voter, Hollis NH

Ingrid M Markman
Hollis, NH

From: [Adams, Angela](#)
To: [Andrea Thorn](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:34:39 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Andrea Thorn <bounce@list.granitestateprogress.org>
Sent: Tuesday, April 23, 2024 5:49 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

As a New Hampshire resident who wants the highest quality public schools, I am concerned about the current draft of the 306 Rules revision. All students need access to public schools where they can learn, grow, and thrive.

Specifically, I am concerned about draft changes that:

Lower academic standards, by changing “programs” and “courses” to “learning opportunities.”

Lower the value of teaching by replacing “teaching” with “facilitated learning,” removing the responsibility of certified educators to approve students’ demonstration of competency and pushing students toward online learning options that do not allow for a teacher to check work and answer questions.

Remove local decision-making to determine how courses, credits, and other elements lead to a diploma, instead “ensuring” that learning opportunities lead to graduation even if they lack rigor.

Establish law through rulemaking by using language changes to strip requirements for academic content areas, making more content optional through shifting language from “shall” to “may.”

Instead, the 306 Rules should:

Include equity and student protections, including requirements that guarantee opportunity for all students and rules that create safe, supportive, and nurturing learning environments.

Restore program elements to ensure that school boards and school leaders have the framework they need to build robust, comprehensive learning programs that are responsive to student needs.

Empower local leaders and schools and allow school districts to design high-quality local competencies that align with state academic standards. Update state academic standards so that all students, regardless of place, are taught the same core fundamental skills and knowledge.

Raise standards for students and teachers by removing language that dilutes and privatizes learning, and instead recenter high-quality instruction and materials and institute consistent, clear, and actionable rules by establishing definitions of key terms.

I urge you to re-approve the current 306 Rules, then revisit the editing process and make updates as necessary. The 306 rules already in existence do a fine job of helping schools run at present. Reverting to the existing language and being more intentional with the editing process by making sure we have qualified educators, parents, and other stakeholders helping to write and approve the updated rules is a crucial step forward in giving the public and school leaders confidence in the results– and above all, ensuring high standards and opportunities for every student.

We all benefit from high quality public education, and I am counting on you to advocate for every New Hampshire public school student by listening to these concerns.

Sincerely,

Andrea Thorn
Newmarket, NH

From: [Adams, Angela](#)
To: [Just Stewart](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:34:26 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

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Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Just Stewart [REDACTED]
Sent: Tuesday, April 23, 2024 5:51 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

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As a New Hampshire resident who wants the highest quality public schools, I am concerned about the current draft of the 306 Rules revision. All students need access to public schools where they can learn, grow, and thrive.

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rigor.

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Instead, the 306 Rules should:

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I urge you to re-approve the current 306 Rules, then revisit the editing process and make updates as necessary. The 306 rules already in existence do a fine job of helping schools run at present. Reverting to the existing language and being more intentional with the editing process by making sure we have qualified educators, parents, and other stakeholders helping to write and approve the updated rules is a crucial step forward in giving the public and school leaders confidence in the results— and above all, ensuring high standards and opportunities for every student.

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Sincerely,

Just Stewart
Northfield, NH

From: [Adams, Angela](#)
To: [Tina Kriebel](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:36:23 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

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New Hampshire Department of Education
Office of the Commissioners

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From: Tina Kriebel <bounce@list.granitestateprogress.org>
Sent: Tuesday, April 23, 2024 5:17 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

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Instead, the 306 Rules should:

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Sincerely,

Tina Kriebel
Peterborough, NH

From: [Adams, Angela](#)
To: [Bill Kingston](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:34:05 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

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Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Bill Kingston <bounce@list.granitestateprogress.org>
Sent: Tuesday, April 23, 2024 5:58 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

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As a New Hampshire resident who wants the highest quality public schools, I am concerned about the current draft of the 306 Rules revision. All students need access to public schools where they can learn, grow, and thrive.

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Sincerely,

Bill Kingston
New Castle, NH

From: [Adams, Angela](#)
To: [Shawn Yager](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:33:43 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

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Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Shawn Yager <bounce@list.granitestateprogress.org>
Sent: Tuesday, April 23, 2024 6:00 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

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As a New Hampshire resident who wants the highest quality public schools, I am concerned about the current draft of the 306 Rules revision. All students need access to public schools where they can learn, grow, and thrive.

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Sincerely,

Shawn Yager
Keene, NH

From: [Adams, Angela](#)
To: [Michael Ginsberg](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:33:34 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Michael Ginsberg <[REDACTED]>
Sent: Tuesday, April 23, 2024 6:02 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

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As a New Hampshire resident who wants the highest quality public schools, I am concerned about the current draft of the 306 Rules revision. All students need access to public schools where they can learn, grow, and thrive.

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Sincerely,

Michael Ginsberg
Amherst, NH

From: [Adams, Angela](#)
To: [Barbara Fitzgerald](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:33:24 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

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Angela

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New Hampshire Department of Education
Office of the Commissioners

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From: Barbara Fitzgerald <bounce@list.granitestateprogress.org>
Sent: Tuesday, April 23, 2024 6:04 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

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As a New Hampshire resident who wants the highest quality public schools, I am concerned about the current draft of the 306 Rules revision. All students need access to public schools where they can learn, grow, and thrive.

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Sincerely,

Barbara Fitzgerald
Sunapee, NH

From: [Adams, Angela](#)
To: [Robert Seavey](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:33:16 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

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New Hampshire Department of Education
Office of the Commissioners

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From: Robert Seavey <bounce@list.granitestateprogress.org>
Sent: Tuesday, April 23, 2024 6:11 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

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Sincerely,

Robert Seavey
Newport, NH

From: [Adams, Angela](#)
To: [Timothy Gearin](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:32:54 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

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From: Timothy Gearin <bounce@list.granitestateprogress.org>
Sent: Tuesday, April 23, 2024 6:19 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

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Raise standards for students and teachers by removing language that dilutes and privatizes learning, and instead recenter high-quality instruction and materials and institute consistent, clear, and actionable rules by establishing definitions of key terms.

I urge you to re-approve the current 306 Rules, then revisit the editing process and make updates as necessary. The 306 rules already in existence do a fine job of helping schools run at present. Reverting to the existing language and being more intentional with the editing process by making sure we have qualified educators, parents, and other stakeholders helping to write and approve the updated rules is a crucial step forward in giving the public and school leaders confidence in the results– and above all, ensuring high standards and opportunities for every student.

We all benefit from high quality public education, and I am counting on you to advocate for every New Hampshire public school student by listening to these concerns.

Sincerely,

Timothy Gearin
Milford, NH

From: [Adams, Angela](#)
To: [Wendy Berkeley](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:32:43 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Wendy Berkeley [REDACTED]
Sent: Tuesday, April 23, 2024 6:21 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

As a New Hampshire resident who wants the highest quality public schools, I am concerned about the current draft of the 306 Rules revision. All students need access to public schools where they can learn, grow, and thrive.

Specifically, I am concerned about draft changes that:

Lower academic standards, by changing “programs” and “courses” to “learning opportunities.”

Lower the value of teaching by replacing “teaching” with “facilitated learning,” removing the responsibility of certified educators to approve students’ demonstration of competency and pushing students toward online learning options that do not allow for a teacher to check work and answer questions.

Remove local decision-making to determine how courses, credits, and other elements lead to a diploma, instead “ensuring” that learning opportunities lead to graduation even if they lack

rigor.

Establish law through rulemaking by using language changes to strip requirements for academic content areas, making more content optional through shifting language from “shall” to “may.”

Instead, the 306 Rules should:

Include equity and student protections, including requirements that guarantee opportunity for all students and rules that create safe, supportive, and nurturing learning environments.

Restore program elements to ensure that school boards and school leaders have the framework they need to build robust, comprehensive learning programs that are responsive to student needs.

Empower local leaders and schools and allow school districts to design high-quality local competencies that align with state academic standards. Update state academic standards so that all students, regardless of place, are taught the same core fundamental skills and knowledge.

Raise standards for students and teachers by removing language that dilutes and privatizes learning, and instead recenter high-quality instruction and materials and institute consistent, clear, and actionable rules by establishing definitions of key terms.

I urge you to re-approve the current 306 Rules, then revisit the editing process and make updates as necessary. High quality public education benefits us all. Please advocate for every New Hampshire public school student by listening to these concerns.

Sincerely,

Wendy Berkeley
Somersworth NH public school parent, taxpayer, and voter

Wendy Berkeley
Somersworth, NH

From: [Adams, Angela](#)
To: [Brenda Cannon](#)
Subject: RE: Concerns around 306 Rules
Date: Wednesday, April 24, 2024 9:36:15 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Brenda Cannon <bounce@list.granitestateprogress.org>
Sent: Tuesday, April 23, 2024 5:21 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Concerns around 306 Rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

As a New Hampshire resident who wants the highest quality public schools, I am concerned about the current draft of the 306 Rules revision. All students need access to public schools where they can learn, grow, and thrive.

Specifically, I am concerned about draft changes that:

Lower academic standards, by changing “programs” and “courses” to “learning opportunities.”

Lower the value of teaching by replacing “teaching” with “facilitated learning,” removing the responsibility of certified educators to approve students’ demonstration of competency and pushing students toward online learning options that do not allow for a teacher to check work and answer questions.

Remove local decision-making to determine how courses, credits, and other elements lead to a diploma, instead “ensuring” that learning opportunities lead to graduation even if they lack

rigor.

Establish law through rulemaking by using language changes to strip requirements for academic content areas, making more content optional through shifting language from “shall” to “may.”

Instead, the 306 Rules should:

Include equity and student protections, including requirements that guarantee opportunity for all students and rules that create safe, supportive, and nurturing learning environments.

Restore program elements to ensure that school boards and school leaders have the framework they need to build robust, comprehensive learning programs that are responsive to student needs.

Empower local leaders and schools and allow school districts to design high-quality local competencies that align with state academic standards. Update state academic standards so that all students, regardless of place, are taught the same core fundamental skills and knowledge.

Raise standards for students and teachers by removing language that dilutes and privatizes learning, and instead recenter high-quality instruction and materials and institute consistent, clear, and actionable rules by establishing definitions of key terms.

I urge you to re-approve the current 306 Rules, then revisit the editing process and make updates as necessary. The 306 rules already in existence do a fine job of helping schools run at present. Reverting to the existing language and being more intentional with the editing process by making sure we have qualified educators, parents, and other stakeholders helping to write and approve the updated rules is a crucial step forward in giving the public and school leaders confidence in the results– and above all, ensuring high standards and opportunities for every student.

We all benefit from high quality public education, and I am counting on you to advocate for every New Hampshire public school student by listening to these concerns.

Sincerely,

Brenda Cannon
Amherst, NH

From: [Adams, Angela](#)
To: [REDACTED]
Subject: RE: Please Reverse Course on your Overhaul of the NH 306 Rules
Date: Wednesday, April 24, 2024 9:49:53 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Lauren Martone <noreply@adv.actionnetwork.org>
Sent: Wednesday, April 24, 2024 9:13 AM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: Please Reverse Course on your Overhaul of the NH 306 Rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

State Board of Education Coordinator Angela Adams,

306 Rules are the requirements that dictate what makes a public school by addressing a long list of specifications, from what students will eat in the cafeteria, to how many kiddos are allowed in each classroom. The 306s are what define the foundation of public education in our state.

The current 306 draft is poorly organized, confusing, and contains some concerning edits.

The proposed rules as currently written remove certification requirements for educators. They also fail to include feedback from representatives who can speak to the needs of different school districts, as they were not asked to participate in the draft process. These proposed rules also fail to include feedback from parents and parent groups (like PTA/PTOs), as they were also prevented from participating in the draft process.

Furthermore, the proposed rules disregard the concerns brought up by educators, parents, and experts, who have grave concerns with the current proposal.

I am urging you to reverse course on this massive rewrite. We will only accept revised 306 Rules that strengthen public education in New Hampshire!

Lauren Martone



From: [Adams, Angela](#)
To: [Bridget Deangelis](#)
Subject: RE: 306 Education Standards
Date: Tuesday, April 23, 2024 3:46:31 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: Bridget Deangelis [REDACTED]
Sent: Tuesday, April 2, 2024 2:14 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: 306 Education Standards

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Good Afternoon,

I am writing to voice my concerns with the possible changes to the 306 Education Standards, specifically in the area of class size. I have many concerns with the proposed updates, but class size is one that I have personal experience with (and do not wish to repeat). Many years ago, my class size reached 28 students. In my 33 years as an educator, this is the year I will always remember as the year I felt the most ineffective and inadequate. My ability to teach and reach every student was challenged at every level. Much of my time was spent on classroom management and large group instruction. It became nearly impossible to give small group, differentiated lessons as the sheer size of the class almost demanded *the one size fits all* lesson, which we know is not good teaching. Creativity was

also impacted as there was little space to spread out for projects and even less one-on-one time to offer meaningful feedback. As I near the end of my career with only a handful of years left to teach, I truly hope to never again feel the inadequacies of that year.

I ask you to please consider the impact class size has on both students and educators alike.

Thank you for your consideration.
Bridget DeAngelis
Bow Memorial School
SAU 67

From: [Adams, Angela](#)
To: [Siobhan Doherty-Rogers](#)
Subject: RE: 306 Rule Changes
Date: Tuesday, April 23, 2024 3:43:11 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: Siobhan Doherty-Rogers <[REDACTED]>
Sent: Tuesday, April 2, 2024 5:41 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: 306 Rule Changes

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Angela,
Please do not alter the 306 Education Changes. Every NH student should have the same education standards and access to quality education. Changes to the 306 Education Standards will harm NH Students.
Thank you,
Siobhan Doherty-Rogers
[REDACTED]
Goffstown, NH 03045

From: [Adams, Angela](#)
To: [Martin Warren](#)
Subject: RE: 306 Rules
Date: Tuesday, April 23, 2024 3:38:27 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: Martin Warren [REDACTED]
Sent: Wednesday, April 3, 2024 9:36 AM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: 306 Rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

April 3, 2024

RE: Upcoming Public hearing April 2 and 11, 2024 of the NHDOE Ed 306 Administrative Rules for Public School Approval and changes to the Minimum Standards for Public School Approval.

Dear Angela Adams:
My name is Martin Warren and I am a NH state technology teacher. I am a resident of Plainfield, NH in Sullivan County. I am writing to urge you to review the comments and

suggested wording submitted by Christine Downing per the educator review sessions. Close to 300 certified teachers reviewed these proposed changes and have put forth their testimony.

Here are just a few concerns that I would like to share with you in hopes that you will revise these Rules and support a full scope for an inclusive and competent public education program.

1. Reducing student electives from 6 to 2.5 is a danger and detriment to students and educators
2. Removal of career ed. programs will have a large impact on hundreds of students statewide.
3. Alternative courses of study: needs review to maintain quality curriculum and instruction.

We as educators have deep concerns regarding: requirements vs expectations, rhetoric like may vs shall, program vs curriculum, student right to choose electives, removal of class size capping, local vs State control, defining Adequate Education, ALL students having a Personal Learning Plan (PLP), accountability.

Sincerely,

Martin Warren

[REDACTED]

Plainfield, NH

Lebanon Middle School

[REDACTED]

[REDACTED]

—
Martin Warren

Digital Learning Specialist

Lebanon Middle School

Lebanon, New Hampshire

The Right-To-Know Law provides that most email communications, to or from Lebanon School District employees regarding the business of the School District, are government records available to the public upon request. Therefore, this email communication may be subject to public disclosure. This email is intended solely for the person or entity to which it is addressed and may contain confidential and/or privileged information. Any review, dissemination, copying, printing, or other use of this email by persons or entities other than the addressee is strictly prohibited. If you receive this email in error, please notify the sender immediately and delete the material from any computer.

From: [Adams, Angela](#)
To: [Christian Terry](#)
Subject: RE: 306 Testimony
Date: Tuesday, April 23, 2024 3:40:49 PM
Attachments: [306 Letter.pdf](#)
[image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
25 Hall Street, Concord NH 03301
Email: angela.m.adams@doe.nh.gov



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From: Christian Terry <[REDACTED]>
Sent: Wednesday, April 3, 2024 7:13 AM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: 306 Testimony

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Hello,

Please take a look at my testimony below regarding the 306 changes. It is also attached to this email as a PDF.

April 3, 2024

RE: The NHDOE Ed 306 Administrative Rules for Public School Approval and changes to the Minimum Standards for Public School Approval are up for public hearing on April 2 and 11, 2024.

Dear Angela Adams:

My name is Christian Terry, and I am an NH state Music/Band teacher. I live in West Lebanon, NH, in Grafton County. I am writing to urge you to review Christine Downing's comments and suggested wording, which were submitted during the educator review sessions. Close to 300 certified teachers reviewed these proposed changes and have submitted their testimony.

Here are just a few concerns that I would like to share with you in hopes that you will revise these Rules and support a full scope for an inclusive and competent public education program.

1. Reducing student electives from 6 to 2.5 is a danger and detriment to students and educators
2. Removal of career ed. programs will have a large impact on hundreds of students statewide.
3. Alternative courses of study: needs review to maintain quality curriculum and instruction.
4. Music is **both** unique and necessary.
5. The goal/purpose of music education is to educate the entire human being through an art form that stimulates many areas of the student's well-being.

We as educators have deep concerns regarding requirements vs. expectations, rhetoric like may vs. shall, program vs. curriculum, student right to choose electives, removal of class size capping, local vs. State control, defining Adequate Education, ALL students having a Personal Learning Plan (PLP), and accountability.

Sincerely,
Christian Terry

[Redacted signature block]

All the best,
Christian J. Terry
Band Director/Music Teacher

[Redacted contact information]



The Right-To-Know Law provides that most e-mail communications, to or from Lebanon School District employees regarding the business of the School District, are government records available to the public upon request. Therefore, this e-mail communication may

be subject to public disclosure. This e-mail is intended solely for the person or entity to which it is addressed and may contain confidential and/or privileged information. Any review, dissemination, copying, printing, or other use of this e-mail by persons or entities other than the addressee is strictly prohibited. If you receive this e-mail in error, please notify the sender immediately and delete the material from any computer.

From: [Adams, Angela](#)
To: [REDACTED]
Subject: RE: 306 revisions
Date: Tuesday, April 23, 2024 3:15:07 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: ann podlipny <[REDACTED]>
Sent: Saturday, April 20, 2024 7:37 AM
To: DOE: Info <doe.info@doe.nh.gov>
Subject: 306 revisions

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

To the Education Committee,
I am absolutely against the 306 revisions championed by Frank Edelblut and his committee. The public is overwhelmingly against these revisions for many good reasons and I join them in opposition. Please pass my comment on to the Education Committee. Thank you and regards, Ann Podlipny, Chester

From: [Adams, Angela](#)
To: [REDACTED]
Subject: RE: 306 revisions
Date: Tuesday, April 23, 2024 3:11:09 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12.

Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: Martha Torrey <[REDACTED]>
Sent: Monday, April 22, 2024 8:26 AM
To: DOE: Info <doe.info@doe.nh.gov>
Subject: 306 revisions

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

I have been a taxpayer in NH for 38 yrs, most in Concord, last 5 in Loudon.
I do not want our public schools to have less stringent criteria, larger classes, and the systemic loss of MY taxpayer money as it has been sent instead to school voucher program people. These voucher payments do NOT require the same school standards, are taking away the needed resources and adequate facilities for our PUBLIC schools.
Bd Chair Cline needs to hear clearly that any further use of MY tax payer money for all of our PUBLIC SCHOOLS, can not be siphoned away to programs that are NOT certified under the same criteria.
And no further stripping away from our tax payer money towards public schools should be allowed.

Please share this with Commissioner Edleblut, and Mr. Cline(who should be recused due to his role in the Josiah Bartlett Center, which supports education voucher program , NOT our public school program.)

I am a very unhappy, caring tax payer in NH.

Martha Torrey
Loudon

From: [Adams, Angela](#)
To: [Catrina Annis](#)
Subject: RE: 306 rules
Date: Tuesday, April 23, 2024 3:47:36 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: Catrina Annis <[REDACTED]>
Sent: Tuesday, April 2, 2024 1:24 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: 306 rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Hello,
I am appalled that there is discussion to change the standards to our 306 laws! As a parent of two children in the Berlin Public Schools in the county of COOS how dare you attempt to reduce the standards in place for our children. Our community has already suffered the effects of the State's **inadequate** funding and the tax payers have had to foot the bill. I don't mind paying a higher tax if it means my kids will have a better education but with the proposed changes to the 306 laws this will mean that my children and the children of this community will be paying higher taxes for lower quality education. These kids are the future!!!!

Catrina Annis, RN

School Nurse

SAU#3 – Berlin Public Schools
Berlin Elementary School

[REDACTED]
[REDACTED] 0
[REDACTED] | www.sau3.org

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From: [Adams, Angela](#)
To: [REDACTED]
Subject: RE: 306 standards
Date: Tuesday, April 23, 2024 3:47:04 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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-----Original Message-----

From: [REDACTED]
Sent: Tuesday, April 2, 2024 2:09 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: 306 standards

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Good Morning Commissioner Adams,

There is only one question of any importance in the discussion of the standards set by 306 rules. That is what will best service the education of New Hampshire students in receiving a quality learning experience? One thing is clear changing the rules for 306 is not it!!! I ask that in this issue you will see that not supporting these changes in 306 will benefit our children most.

Sincerely,

Dorothea Vecchiotti, PhD
Developmental Psychologist (retired)
Resident of Peterborough

From: [Adams, Angela](#)
To: [Linda Poulin](#)
Subject: RE: Against lowering standards
Date: Tuesday, April 23, 2024 3:43:28 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: Linda Poulin [REDACTED]
Sent: Tuesday, April 2, 2024 5:31 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Against lowering standards

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Hello,
This email is written strongly against eliminating the 306 standardization rules. I am frankly disgusted that this would even be considered. I do not want a cookie cutter school system for children. I fully expect each and every person employed by our public school systems to be highly qualified and certified. I expect each teacher to meet standards in order to step in a classroom. I expect every related service provider (SLP, OT, PT) to be fully certified and licensed under NH guidelines.

And I expect if tax money is used to help with tuition to private schools or homeschoolers, then the

same standards should be enforced. I am sick to my stomach of having children homeschooled so that their parents can draw that income. Parents that do not have the cognitive skills to teach their children beyond the second grade. Parents who are lying and not really homeschooling their children. There is no accountability to determine if homeschooling is meeting the needs of children. We don't expect any type of testing from either private schools or homeschoolers.

Each child deserves a quality education and NH is failing in all areas. Please do not make this worse by supporting the abolishment of the 306 standards.

~
Linda A. Poulin, M.S., CCC-SLP
Speech Pathologist

SAU#3 – Berlin Public Schools

Berlin Elementary School

[REDACTED]

[REDACTED]

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From: [Adams, Angela](#)
To: [Marge White](#)
Subject: RE: Changes to the board of education
Date: Tuesday, April 23, 2024 3:41:00 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator

New Hampshire Department of Education
Office of the Commissioners

Phone: 603-271-3144

25 Hall Street, Concord NH 03301

Email: angela.m.adams@doe.nh.gov



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Department of Education

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From: Marge White [REDACTED]
Sent: Wednesday, April 3, 2024 12:11 AM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: Changes to the board of education

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Dear Ms. Adams,

I had a very upsetting email with a video attached on how we want to change the board of education. I find this very alarming with the atmosphere in this country. Now I feel like we need stronger regulations and if the last five or six years have taught us anything, we need to be teaching more science and definitely more civics. We don't need to let our children down and we don't need to follow what other states are doing in this country and have less and less education for our children.. We're falling behind everywhere in the world. The New Hampshire has always had strong education for children but good schools is what keeps communities going. Thank you for your time in this..

Marge White

From: [Adams, Angela](#)
To: [Goodwin, Sean](#)
Subject: RE: Comment regarding Ed-306
Date: Tuesday, April 23, 2024 3:36:45 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: Goodwin, Sean [REDACTED]
Sent: Wednesday, April 3, 2024 1:31 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: Comment regarding Ed-306

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Dear Angela,

The Winnisquam Regional School Board is not in favor of the proposed revisions to the graduation requirements laid out in ED-306. We urge you to follow the recommendations supported by the professional educators across the state and the professional associations that represent them.

Sincerely,

Sean R. Goodwin, Chair
Winnisquam Regional School Board

From: [Adams, Angela](#)
To: [NANCY CRAWFORD](#)
Subject: RE: Comments on revision to 306 rules
Date: Tuesday, April 23, 2024 3:38:36 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator

New Hampshire Department of Education
Office of the Commissioners

Phone: 603-271-3144

25 Hall Street, Concord NH 03301

Email: angela.m.adams@doe.nh.gov



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Department of Education

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From: NANCY CRAWFORD [REDACTED]
Sent: Wednesday, April 3, 2024 9:33 AM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Comments on revision to 306 rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

I oppose the revisions proposed by NH Commissioner of Education Frank Edelblut. Public education is a vital part of the promise we make to our children to prepare them for life. The propose changes undercut this promise in important ways.

- They in fact decrease opportunities for students by shifting language from "shall" to "may".
- They risk increasing inequities between and within districts and the fact of a students geographical location may influence the opportunities available to that student.

- They lower standards for schools, teachers and students and weaken the definition of "competency".
- There will be increased economic pressure on local communities to fill the gap to provide high quality education. There is a wide disparity between local districts' ability to provide this funding.

I am perplexed by the fact that Frank Edelblut NH Commissioner of Education has appeared to undermine public education in many of his initiatives. It is our children who suffer when we do not provide them with a public education that prepares them for future success.

Please do not allow the Commissioner's changes to stand.

Nancy Crawford

Cheshire County

Registered voter

████████████████████

Keene, NH 03431

From: [Adams, Angela](#)
To: [Nicole Demarest](#)
Subject: RE: Disapproval of many proposed changes to 306 Rules
Date: Tuesday, April 23, 2024 3:46:15 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator

New Hampshire Department of Education
Office of the Commissioners

Phone: 603-271-3144

25 Hall Street, Concord NH 03301

Email: angela.m.adams@doe.nh.gov



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From: Nicole Demarest [REDACTED]
Sent: Tuesday, April 2, 2024 2:47 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>; Edelblut, Louis (Frank) <frank.edelblut@doe.nh.gov>
Subject: Disapproval of many proposed changes to 306 Rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Dear Ms. Adams,

I have been watching with dismay the NH State Board of Education's work over the last year to revise the 306 Rules that shape our system of education in this state. I do not support the revisions as proposed.

There are many of these proposed revisions that will lead to the degrading of this state's generally high quality education that is provided to all our children. In

particular, I find it not only surprising but actually ridiculous, that the Board of Education proposes to increase class sizes. This can only be rooted in the lack of understanding of what quality education requires. This must not change.

I also believe that the frequent substitution of the word "opportunities" for the word instruction is a proposal that will lead to the hollowing out of the robust education that is now required.

Please listen to the experienced educators throughout this state that do not approve of these changes.

Nicole Demarest

From: [Adams, Angela](#)
To: [Cindy Grigorakakis](#)
Subject: RE: Do NOT lower our education standards
Date: Tuesday, April 23, 2024 3:45:51 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: Cindy Grigorakakis [REDACTED]
Sent: Tuesday, April 2, 2024 3:39 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Cc: Brian.balke@sau19.org
Subject: Do NOT lower our education standards

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Good Afternoon Angela,

My name is Cindy Grigorakakis and I'm a concerned parent of children enrolled in SAU19-Goffstown and New Boston Public Schools. I wanted to take the time this afternoon to express my deep concern many of the proposed administrative rules to the NH Department of Education Ed 306 draft. I do NOT want to see New Hampshire lower our standards of education and eliminate the value of what public education can do for our children.

The Department's draft rebukes many of the suggested changes made by the National Center for Competency-Based Learning which had intentional input from New Hampshire school districts and

experienced educators. Many of the Department's proposed revisions to Ed 306 point to an overall reduction in elements included in the minimum standards and/or widening of the interpretations of standards. **These changes appear to be a calculated attempt to not only weaken the interpretation and responsibilities of public schools, but also point to a calculated effort to loosen the state's constitutional requirements to adequately fund public education in our state.**

It leaves me these questions:

What service are we providing our New Hampshire children when we lower the ceiling of their potential?

What service are we providing our hardworking educators when we create classroom environments that do not support their success?

What does it say about our values as a state when we weaken the institutions that support our future citizen's well-being, earning potential, and health outcomes?

Once again I urge the Department to reconsider the revisions made to Ed-306 that would weaken our public schools AND to reconsider the proposed revisions supported by the State's teacher's union and the National Center for Competency-based Learning. This is essential for Department so it can work in good faith with those who are responsible for implementing the changes and those affected by them.

Most Sincerely,

Cindy Grigorakakis
Parent, SAU19

From: [Adams, Angela](#)
To: [Greg Eaton](#)
Subject: RE: ED 306 hearing
Date: Tuesday, April 23, 2024 3:42:39 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: Greg Eaton [REDACTED]
Sent: Tuesday, April 2, 2024 8:23 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: ED 306 hearing

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Hi Angela,

My wife and I just learned about this topic tonight and that it's going to the board tomorrow. After reviewing some of the materials available to us, we think this is a horrible idea as a way for the State to save money. Education is not the place to make those changes and cuts. We need to keep the standards to maintain the integrity of the educational system. The direct potential effect on us as parents in a small NH Town is frightening.

We are against lowering the standards and do not support the change.

Thank you,
Greg Eaton
Winchester, NH

From: [Adams, Angela](#)
To: [NHAWLT President](#)
Subject: RE: ED 306
Date: Tuesday, April 23, 2024 3:40:52 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: NHAWLT President <[REDACTED]>
Sent: Wednesday, April 3, 2024 7:01 AM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: ED 306

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

April 3, 2024
RE: Upcoming Public hearing April 3 and 11, 2024 of the NHDOE Ed 306 Administrative Rules for Public School Approval and changes to the Minimum Standards for Public School Approval.

Dear Angela Adams:
My name is Karen Bowman Cox and I am the president of the NH Association of World Language Teachers, president of the Northern New England chapter of the American Association of Teachers of German, and a World Language Educator for SAU 57 in Salem who resides in Merrimack County. I am writing to urge you to review the comments and suggested wording submitted by Christine Downing per the educator review sessions. Close to 300 certified teachers reviewed these proposed changes and have put forth their testimony.

Here are just a few concerns that the New Hampshire World Language Educators would like to share with you in hopes that you will revise these Rules and support a full scope for an inclusive and competent public education program.

1. Reducing student electives from 6 to 2.5 is a danger and detriment to students and educators
2. Removal of career ed. programs will have a large impact on hundreds of students statewide.
3. Alternative courses of study: needs review to maintain quality curriculum and instruction.

We as educators have deep concerns regarding: Requirements vs expectations, Rhetoric like may vs shall, Program vs curriculum , Student right to choose electives , Removal of class size capping , Local vs State control , Defining Adequate Education, ALL students to have a Personal Learning Plan (PLP), Accountability.

Sincerely,
Karen Bowman Cox

1 [REDACTED]

SAU 57 - Salem NH

[REDACTED]
[REDACTED]
[REDACTED]

--

Karen Bowman Cox
NHAWLT President

[REDACTED]
[REDACTED]
[REDACTED]

www.nhawlt.org



From: [Adams, Angela](#)
To: [Dian McCarthy](#)
Subject: RE: ED 306
Date: Tuesday, April 23, 2024 3:42:37 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: Dian McCarthy [REDACTED]
Sent: Tuesday, April 2, 2024 8:34 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: ED 306

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Dear Ms Adams and the State Board of Education,

I am writing to express my strong concerns regarding the potential amendment and reduction of ED 306 standards for public education. As a concerned citizen and former School Board member, I urge the State Board of Education to prioritize and protect these standards for the betterment of our education system in New Hampshire.

Strong public schools are the cornerstone of our communities' well being. It is crucial that we maintain high standards in public education to ensure that our students receive the quality education they need to grow into educated, productive members of society. Any efforts to diminish

these standards would have a detrimental impact on the future of our students and the overall education system in our state as well as diminishing property values while grossly increasing the property taxes in some communities.

I urge you to take action to safeguard ED 306 Standards and prevent any reduction of these essential benchmarks. Our students' success and the integrity of our education system depend on it. Thank you for your attention to this urgent matter. I trust that you will do everything in your power to uphold and protect our public education standards.

Thank you,

Dian McCarthy
Goffstown, NH

From: [Adams, Angela](#)
To: [Andra Hall](#)
Subject: RE: Ed 306 hearing
Date: Tuesday, April 23, 2024 3:41:10 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: Andra Hall <[REDACTED]>
Sent: Tuesday, April 2, 2024 10:55 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Ed 306 hearing

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Good afternoon NH State Board of Education,

I hope this message finds you well. I would ask that each of you watch *Lost in Laconia*, a documentary that can be found on PBS and YouTube for free. It is about our state institutions during a time when there weren't laws and high standards for the education of ALL children. Please consider the implications on our children, their future and the future of this great state when you are considering this draft document that will ultimately lower the standards and widen the gap.

Thank you for your consideration,

Dr. Andra Häll

From: [Adams, Angela](#)
To: [Casey Leach](#)
Subject: RE: Ed. 306 Standards
Date: Tuesday, April 23, 2024 3:43:22 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: Casey Leach [REDACTED]
Sent: Tuesday, April 2, 2024 5:40 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: Ed. 306 Standards

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Dear State Board of Education.

I am writing to express my strong concerns regarding the potential amendment and reduction of NH 306 standards for public education. As a concerned citizen, I urge the State Board of Education to prioritize and protect these standards for the betterment of our education system in New Hampshire.

It is crucial that we maintain high standards in public education to ensure that our students receive the quality education they deserve. Any efforts to diminish these standards would have a detrimental impact on the future of our students and the overall education system in our state as well as diminishing property values while grossly increasing the property taxes in some communities.

I implore you to take action to safeguard NH 306 Standards and prevent any reduction of these essential benchmarks. Our students' success and the integrity of our education system depend on it.

Thank you for your attention to this urgent matter. I trust that you will do everything in your power to uphold and protect our public education standards.

Sincerely,
Casey Leach
Goffstown, NH

From: [Adams, Angela](#)
To: [Mary Jenkins](#)
Subject: RE: Ed. 306 Standards
Date: Tuesday, April 23, 2024 3:47:57 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: Mary Jenkins <[REDACTED]>
Sent: Tuesday, April 2, 2024 12:59 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: Ed. 306 Standards

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

To the NH Board of Education:

Please accept this note of OPPOSITION to lowering NH Ed. 306 Standards.

We need standards at or above current levels. Reducing Ed 306 Standards will do harm to our students, our communities, our system of education, local taxes, quality of life here, and our economy. It seems obvious to me that there are forces at play in this state that seek to dismantle public education and this is one more attack on the core of our commitment to quality education.

I ask you to take action to safeguard NH 306 Standards and prevent any reduction in these essential

benchmarks. Our students' success and the integrity of our education system depend on it.

Thank you for your attention to this urgent matter. I trust that you will do everything in your power to uphold and protect our public education standards.

Sincerely,

Mary Feick Jenkins
Goffstown, NH 03045

[REDACTED]

From: [Adams, Angela](#)
To: [Paul Jenkins](#)
Subject: RE: Ed. 306 standards
Date: Tuesday, April 23, 2024 3:47:49 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: Paul Jenkins <[REDACTED]>
Sent: Tuesday, April 2, 2024 1:10 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: Ed. 306 standards

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

To the NH Board of Education:

Hello.

Please accept this note of OPPOSITION to lowering NH Ed. 306 Standards.

We need standards at or above current levels. Reducing Ed 306 Standards will do harm to our students, our communities, our system of education, local taxes, quality of life here, and our economy. It seems obvious to me that there are forces at play in this state that seek to dismantle public education and this is one more attack on the core of our commitment to quality education.

I ask you to take action to safeguard NH 306 Standards and prevent any reduction in these essential benchmarks. Our students' success and the integrity of our education system depend on it.

Thank you for your attention to this urgent matter. I trust that you will do everything in your power to uphold and protect our public education standards. This work is vital to the wellbeing of our state, and our nation.

Sincerely,

Paul O. Jenkins
Goffstown, NH 03045

[REDACTED]

From: [Adams, Angela](#)
To: [Jillian Pelletier](#)
Subject: RE: Education Ed 306 draft
Date: Tuesday, April 23, 2024 3:39:26 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: Jillian Pelletier [REDACTED]
Sent: Wednesday, April 3, 2024 8:37 AM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: Education Ed 306 draft

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Good morning Angela,

My name is Jillian Pelletier and I'm a concerned sister of a student who attended and recently graduated from SAU19- Goffstown and New Boston Public Schools. I wanted to take the time to express my deep concern of many of the proposed administrative rules to the NH Department of Education Ed 306 draft. I do NOT want to see New Hampshire lower our standards of education and eliminate the value of what public education can do for children.

The Department's draft rebukes many of the suggested changes made by the National Center for

Competency-Based Learning which had intentional input from New Hampshire school districts and experienced educators. Many of the Department's proposed revisions to Ed 306 point to an overall reduction in elements included in the minimum standards and/or widening of the interpretations of standards. These changes appear to be a calculated attempt to not only weaken the interpretation and responsibilities of public schools, but also point to a calculated effort to loosen the state's constitutional requirements to adequately fund public education in our state.

It leaves me these questions:

What service are we providing our New Hampshire children when we lower the ceiling of their potential?

What service are we providing our hardworking educators when we create classroom environments that do not support their success?

What does it say about our values as a state when we weaken the institutions that support our future citizen's well-being, earning potential, and health outcomes?

Once again I urge the Department to reconsider the revisions made to Ed-306 that would weaken our public schools AND to reconsider the proposed revisions supported by the State's teacher's union and the National Center for Competency-based Learning. This is essential for Department so it can work in good faith with those who are responsible for implementing the changes and those affected by them.

Most Sincerely,

Jillian Pelletier

From: [Adams, Angela](#)
To: [Amanda Johnson](#)
Subject: RE: I want high standards for my children
Date: Tuesday, April 23, 2024 3:36:21 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: Amanda Johnson [REDACTED]
Sent: Wednesday, April 3, 2024 3:40 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: I want high standards for my children

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

I want high standards for my children and every child in New Hampshire not some gutted plan

From: [Adams, Angela](#)
To: [Laura Couble](#)
Subject: RE: Keep our standards high
Date: Tuesday, April 23, 2024 3:42:23 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: Laura Coubl [REDACTED]
Sent: Tuesday, April 2, 2024 8:51 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Keep our standards high

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Changes that lower the education standards in NH are short sighted.
A high standard of education for all lifts the lives of all.
Please protect the future of NH and protect public education!

Laura Couble
[REDACTED]

From: [Adams, Angela](#)
To: [Michelle Ramauro](#)
Subject: RE: Minimum Standard Rules NH Ed 306 Rules
Date: Tuesday, April 23, 2024 3:47:36 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator

New Hampshire Department of Education

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From: Michelle Ramauro [REDACTED]
Sent: Tuesday, April 2, 2024 1:35 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Minimum Standard Rules NH Ed 306 Rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Dear Ms. Adams,

I am writing in advance of the April 3, 2024 State Board of Education hearing on the NHED recommendation for proposed Ed 306 Minimum Standard.

Our 14 year old daughter is currently a 9th grade freshman at Keene High School where we believe she is receiving a high quality public school education that supports her aspiration for a four year college and perhaps graduate school education. I believe and feel that all Granit State students deserve a high quality education that supports future educational goals as well as technical and career development provided by certified and experienced educators.

I would like the State Board of Education to know that as a high school student parent and NH resident I oppose the NHED recommendation for proposed Ed 306 Minimum Standard Rules.

Thank you for conveying this opposition on my behalf.

Sincerely,

Michelle Ramauro

[REDACTED]

[REDACTED]

From: [Adams, Angela](#)
To: [Jacqueline Coe](#)
Subject: RE: Minimum Standards for State Approval
Date: Tuesday, April 23, 2024 3:37:47 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: Jacqueline Coe [REDACTED]
Sent: Wednesday, April 3, 2024 10:32 AM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Minimum Standards for State Approval

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Date: April 3, 2024
To: New Hampshire State Board of Education
From: Jacqueline Coe, Ed.D. *Bow, NH*
Re: Minimum Standards for State Approval

I am writing as a lifelong New Hampshire resident, a product of the New Hampshire public schools and as a New Hampshire educator. I urge the State Board to approve standards that strengthen public education.

The revision of the standards on the table could undermine the quality of education in

New Hampshire, provide fewer opportunities for our students, and add additional burden on our already strapped communities.

I am specifically concerned about:

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- Language that shifts from "shall" to "may" serves to make many required standards optional.
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- Replacement of instruction with open-ended references like "opportunities,"
- which could lower the bar for what constitutes a course or credit and set the conditions for the state to outsource them to private companies.
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- Elimination of program requirements.
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- References to particular companies or organizations as preferred providers.
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- Elimination of important standards for student well being and elimination of language
- requiring a safe and supportive environment.
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- Removal of language that protects students from discrimination and bias.
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- Language that eliminates commitments to every student regardless of characteristics.
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- Removal of language that provides for instruction based on differentiation, individualization,
- and personalization.
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- Removal of maximum class size requirements for K-12.
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-

- Removal of local control regarding competencies, graduation requirements, and assessments.
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-
-
- Broadening language in a way that creates inconsistencies from one school to the next, including: changing "certification" to "license" in teaching requirements; changing "instruction" to "learning"; changing from "graduation requirements" to "graduation expectations"
-
-
-
- Removal of all references to local accountability and assessment; and weakening the definition of "competency" and "competency-based education."
-
-
-
- Removal of the framework for each subject area.
-

In states that have experimented with lowering standards, there's often an increase in pressure from parents and community members to fill the gap. In many communities this will mean that the cost of providing a high quality education would fall even more onto the backs of local taxpayers. High-quality public schools are a key factor in local economic development, attracting families and businesses to an area. Lowering standards detracts from this appeal, negatively affecting local economies and property values.

Over the last year, hundreds of parents, educators, students and community members have provided feedback on the revision of the minimum standards. The draft on the table contains very little feedback from these stakeholders. I encourage the Board to incorporate feedback from this process and to revise the standards in ways that strengthen our schools.

From: [Adams, Angela](#)
To: [Dan Williams](#)
Subject: RE: My testimony regarding the proposed 306 rules changes
Date: Tuesday, April 23, 2024 3:46:39 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator

New Hampshire Department of Education
Office of the Commissioners

Phone: 603-271-3144

25 Hall Street, Concord NH 03301

Email: angela.m.adams@doe.nh.gov



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From: Dan Williams <[REDACTED]>
Sent: Tuesday, April 2, 2024 2:12 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: RE: My testimony regarding the proposed 306 rules changes

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Hello,

I just received an information email from our Superintendent regarding tomorrow's hearing regarding the proposed 306 rules changes. I am unfortunately unable to attend this hearing, as I'm at the end of what has been a very long and busy month (Music in our Schools Month). I will tell you that during this month I have done the following . . .

1) Traveled to the New England music festival with students who were talented enough to have successfully auditioned for this three day band/orchestra/choral event, culminating in a performance at Mechanics Hall in Worcester, MA

- 2) Traveled to the State House in Concord with my Stage Band to perform at "Hill Day", sponsored by NHMEA.
- 3) Music directed our Spring musical, "Between the Lines" where I was fortunate to work with our Theatre director and our talented student-thespians.
- 4) Take our band/choral students on a field trip to see a performance of Grieg's "Peer Gynt" at Symphony Hall in Boston.
- 5) Supervise our Tri-M music honor society's "HOCO 2.0" fundraising dance, which was a smashing success!
- 6) Later this week, I will attend the NH All-State festival with students who successfully auditioned for a spot in the All State band and chorus.
- 7) Next Tuesday my choral colleague and myself will welcome our sending school Music educators and their students for a half-day Music "Sharing festival" where we will all perform together.

It pains me that NONE of these incredible experiences that I've been able to share with my students might be possible in the future if the NH 306 rules are gutted by the Legislature and Dept. of Education. In my 30 years as a Music educator, the past 18 of which have been here at John Stark, I've seen my students go on to successful careers in Performing Arts-related fields, and other prominent fields like Healthcare, STEM, engineering, etc. I know that their success was at least partially the result of their participation in Music programs in school, where they learned to become literate, caring members of a team, working towards a common goal. And where they learned the value of disciplined practice and preparation, goal-setting, prioritizing, and generally being decent human beings in the process.

If standards are written into law that exclude subjects like Music from the definition of an "adequate education", you can expect to see student performance in NH plummet across the board. Please do not let this happen. Don't let down NH's children.

Dan Williams, Instrumental Music Director
Tri-M Music Honor Society Chapter Advisor
Capstone Coordinator
John Stark Regional High School
618 North Stark Highway
Weare, NH 03281

[REDACTED]
(603) 529-5353

Good afternoon. My name is Irv Richardson. I am the Coordinator for Public Education and school Support for NEA-New Hampshire. I also teach in Southern New Hampshire University's doctoral program in educational leadership. I have experience as a classroom teacher, principal, as well as working in the Maine Department of Education and as the Director of Shared Leadership for the Council of Chief State School Officers. President Megan Tuttle and I were honored to work with the National Center for Competency Based Education and the NH DOE since last November to make recommendations about what should be in the Minimum standards.

While working for the Council of Chief State School Officers, I was a member of collaborative committees of educators from throughout the country who developed National Teacher Standards and the Professional Standards for Educational Leaders. I came away from my work on those committees understanding what a challenge it is to reach consensus with a document such as New Hampshire's Minimum standards. From my work on standards documents, I took away several lessons that can be applied to New Hampshire's 306s.

One of the first lessons is the need for current, updated standards. I commend the NH DOE and the National Center for Competency-Based education and the 306 workgroup for their efforts to update the standards. As we are all aware, the contexts surrounding education are rapidly changing due to changes in society, technology, and even in our youth. My belief in the utility of updated, current standards makes me concerned about the age of some of our current college and career standards which are represented in the second half of the 306s. Christine Downing, the Director of curriculum, Instruction, and Assessment for the Cornish, Grantham, and Plainfield School Districts and the Volunteer Facilitator for Educator Review Sessions of 306 Rules will likely address the age of our current standards and the need to update them in her testimony about her work on the content sections of the 306s.

From my work on standards, I also learned the importance of clearly articulating what is required versus what is optional. One of the discussions we had in the 306 workgroup was whether curricular requirements should be permissive or required. I believe there are concepts and knowledge that every graduate from

a New Hampshire high school should possess. By inserting permissive language that a curriculum area *may contain* certain concepts and topics makes it possible for districts to pick and choose what graduating students should know and be able to do instead of clearly indicating the required knowledge, skills, and habits of mind. Imagine each of us starting driver's education schools. As drivers, we know that there are certain concepts and knowledge that every driver must know and follow in order to be licensed and keep us drive safely. Imagine what our roads would be like if each of our driver's education schools were permitted to choose our own curriculum. Maybe you might decide that since there is only one traffic light in your town, you choose to skip that part of the regulations. Driving in your town, the graduates from your school might be okay, but they would at a great disadvantage when they went to cities and towns with many traffic lights.

Within the last couple of weeks, almost 500 New Hampshire educators have signed a petition indicated that they want the rules that you adopt to ensure clarity around what students should know and be able to do upon graduation. I urge you clearly articulate what knowledge and skills New Hampshire graduates must have and not permit local school boards to pick and choose what students should know.

Another lesson I took from my standards work is the wisdom of practitioners and others potentially affected by regulations. The public educators who will implement these standards have valuable knowledge of curriculum, pedagogy, and what students should know and be able to do. I am very encouraged that over 250 New Hampshire educators provided input into what should be in the curricular areas of the minimum standards during the sessions led by Christine Downing. I also hope that the voices of students and parents will also be heard to ensure that the minimum standards that you adopt are informed by their ideas and opinions as well.

For a variety of reasons, there is currently great interest in this revision of the 306s. I think this is a good thing. If the State Board adopts a set of minimum standards that truly represents what educators, students, parents, and policy makers want to be accountable for, then we can leverage the current interest and focus on these minimum standards and translate that interest into the

positive energy and inertia New Hampshire will need to implement the new minimum standards.

Thank you for your time this afternoon.

From: [Adams, Angela](#)
To: [Kelly Socia](#)
Subject: RE: NH 306 Standards and proposed changes
Date: Tuesday, April 23, 2024 3:42:14 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator

New Hampshire Department of Education
Office of the Commissioners

Phone: 603-271-3144

25 Hall Street, Concord NH 03301

Email: angela.m.adams@doe.nh.gov



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From: Kelly Socia [REDACTED]
Sent: Tuesday, April 2, 2024 9:20 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: NH 306 Standards and proposed changes

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Dear State Board of Education,

I am writing to express my strong concerns regarding the potential amendment and reduction of NH 306 standards for public education. As a concerned citizen, an educator, and a member of a local school board, I urge the State Board of Education to prioritize and protect these standards for the betterment of our education system in New Hampshire.

It is crucial that we maintain high standards in public education to ensure that our students receive the quality education they deserve. Any efforts to diminish these standards would have a detrimental impact on the future of our students and the overall education system in our state as

well as diminishing property values while grossly increasing the property taxes in some communities.

I implore you to take action to safeguard NH 306 Standards and prevent any reduction of these essential benchmarks. Our students' success and the integrity of our education system depend on it.

Thank you for your attention to this urgent matter. I trust that you will do everything in your power to uphold and protect our public education standards.

Sincerely,
Kelly Socia, Ph.D.
New Boston, NH

From: [Adams, Angela](#)
To: [REDACTED]
Subject: RE: NH 306 standards
Date: Tuesday, April 23, 2024 3:45:18 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator

New Hampshire Department of Education
Office of the Commissioners

Phone: 603-271-3144

25 Hall Street, Concord NH 03301

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-----Original Message-----

From: [REDACTED] <[REDACTED]>
Sent: Tuesday, April 2, 2024 4:21 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: NH 306 standards

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Dear Members of the State Board of Education.

I am writing because I am very concerned over the lowering of the NH 306 standards for public education. As a concerned citizen, I would like to keep the higher education standards for the sake of our public school students. Lowering these standards and disregarding the importance of teacher's certification can only destroy the students chance of success in the future. Outsourcing subjects to questionable companies for credits is a dangerous, slippery slope to limit students' scope of exposure to many other opinions and theories. I realize some people are trying to dismantle the public schools, but I didn't think the NH State Board of Education would be involved. I trust you will

prove me wrong and do everything in your power to uphold and protect our public school education standards. After all, public schools are where a majority of our students in our state are being taught.

Thank you,

Laura Adams

Goffstown, NH

Sent from my iPhone

From: [Adams, Angela](#)
To: [Barry Brensinger](#)
Subject: RE: NH 306
Date: Tuesday, April 23, 2024 3:48:07 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12.

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Thank you,

Angela

Angela M. Adams | Administrator

New Hampshire Department of Education

Office of the Commissioners

Phone: 603-271-3144

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From: Barry Brensinger <[REDACTED]>
Sent: Tuesday, April 2, 2024 12:56 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Cc: Barry Brensinger <[REDACTED]>
Subject: NH 306

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Dear Angela,

Please convey my deep concerns and objection to the proposed NH 306 changes to the Board. In a competitive world, New Hampshire needs to be making stronger public schools, not dismantling them bit by bit.

Sincerely,
Barry Brensinger
Manchester, NH

From: [Adams, Angela](#)
To: [Barbara Koehler](#)
Subject: RE: NH DOE Public Comment Session
Date: Tuesday, April 23, 2024 3:39:47 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator

New Hampshire Department of Education
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Phone: 603-271-3144

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From: Barbara Koehler [REDACTED]
Sent: Wednesday, April 3, 2024 7:38 AM
To: Shea, Julie <Julie.R.Shea@doe.nh.gov>
Cc: Adams, Angela <angela.adams@doe.nh.gov>
Subject: NH DOE Public Comment Session

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Dear MS. Shea and Adams,

I wish to provide comment on the NHED's Recommendations for minimum standards for NH schools. We have seen through the past several years the slow takeover of many of our local controls by the state. We are currently struggling with our own school to get it back on track with an emphasis on academics. We have poured money, year after year, to no avail. Money is not the answer. Local people getting involved and forcing changes IS the answer. Unfortunately, many schools have to follow the dictates of the State; this has not proved advantages to the students when it comes to education.

I suggest we diminish the influence of the NH Board of Education and reduce their power, not enhance it. Clearly it is not working. NH schools no longer perform at the level they did 10 years ago, despite throwing more and more money at it. Please defeat this effort to take away even more local control.

Respectfully,

Barbara Koehler, Moultonborough

From: [Adams, Angela](#)
To: [Nancy Wright](#)
Subject: RE: NH Public Comment on Public Schools
Date: Tuesday, April 23, 2024 3:39:10 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator

New Hampshire Department of Education

Office of the Commissioners

Phone: 603-271-3144

25 Hall Street, Concord NH 03301

Email: angela.m.adams@doe.nh.gov



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-----Original Message-----

From: Nancy Wright [REDACTED]
Sent: Wednesday, April 3, 2024 9:09 AM
To: Shea, Julie <Julie.R.Shea@doe.nh.gov>
Cc: Adams, Angela <angela.adams@doe.nh.gov>
Subject: NH Public Comment on Public Schools

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

My comments on NHED's for Minimum Standards in our Public Schools.

At our March District Meeting, our town voted to approve an 18+million dollar school budget and an additional 8+ million needed for facility repairs. Moultonborough has a total of 480 students in grades P-12. Meanwhile taxpayers have seen academic scores decline as the emphasis has gone from academic excellence to teaching "woke" policies. Our School Board and Superintendent pay no attention to pleas from the public to please focus on academic....not woke policies. Mediocracy rules the day in our public schools....sad.

Sincerely,

Nancy Wright
Moultonborough, NH

Sent from my iPad

From: [Adams, Angela](#)
To: [Shannon Eaton](#)
Subject: RE: NH State Board of Education Ed 306 Hearing
Date: Tuesday, April 23, 2024 3:42:47 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: Shannon Eaton [REDACTED]
Sent: Tuesday, April 2, 2024 8:20 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: NH State Board of Education Ed 306 Hearing

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Dear Angela,

Today I received an email from my husband about a hearing regarding the education standards in NH that will take place tomorrow, Wednesday, April 3, 2024 in Concord, NH.

First of all, I'm disappointed that I hadn't learned about this hearing until today, especially regarding the education of my child (and all other children in NH which includes many of my nieces and nephews throughout the state).

I am opposed to the Minimum Standard Rules for schools in our state. We can do better!

Secondly, holding children to the MINIMUM means that we are lowering standards and expectations.

How can we have children who are successful and how can we decrease their dependability on us (their caregivers)? We need children who have perseverance, grit, and motivation. We need to provide them the foundation, knowledge, and skills to ensure that they can succeed as members of society and parents. We also need to consider providing the necessary experiences and scaffolding for children who are less fortunate (due to economic background or immigration).

Thirdly, it's extremely degrading to not support small towns that already struggle. I currently live in a small town that has lost SEVERAL teachers in the past two years due to poor pay and/or lack of funding. The children in these towns have less curricula (be it Art or Music) due to funding issues. Many of the families of these children can't or don't know how to advocate for their children. So, we're perpetuating the cycle.

Lastly, allowing educators to teach who aren't certified to do so is a discredit to our children. Imagine having a teacher who is basically a babysitter! It's acceptable to expect educators to not only take care of children, but to actually teach the standards. When you put educators in classrooms without proper education and training, you get children who attend P.E. class with a teacher who regularly allows "free time," or an art teacher who looks up activities online. Sometimes, you get teachers who are qualified in one specialized area who are forced to teach in an area they are not qualified in and another unqualified person teaches in their place. Now, you have at least two teachers who are not qualified in their subject or are inaccurately conveying information to children. What's the problem? Children are losing quality education.

There are so many problems with these proposed changes in the standard rules for NH public schools. I DO NOT support them and I'm urging you to find a way to support high quality standards for our children. I will stand behind you to do this.

In solidarity,

Shannon Eaton
(parent of a child in NH schools and an educator)

From: [Adams, Angela](#)
To: [Michael Pelosi](#)
Subject: RE: New Education Bills
Date: Tuesday, April 23, 2024 3:33:39 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
25 Hall Street, Concord NH 03301
Email: angela.m.adams@doe.nh.gov



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From: Michael Pelosi <[REDACTED]>
Sent: Tuesday, April 9, 2024 7:36 AM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: New Education Bills

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Dear Angela Adams:

My name is Michael Pelosi and I am a NH World Language teacher in Rockingham County. I am writing to urge you to review the comments and suggested wording submitted by Christine Downing per the educator review sessions. I, along with almost 300 other certified teachers, reviewed the current proposed changes in March and made important edits to them.

Here are just a few concerns that the New Hampshire World Language Educators would like to share with you in hopes that you will revise these rules and support a full scope for an inclusive and competent public education program.

1. Reducing student electives from six to 2.5 is a danger and detriment to students and

educators

2. Removal of career ed. programs will have a large impact on hundreds of students statewide.
3. Alternative courses of study needs review to maintain *quality* curriculum and instruction.

We as educators have deep concerns regarding: requirements vs expectations, rhetoric like may vs. shall, program vs. curriculum, student right to choose electives, removal of class size capping, local vs state control, defining adequate education, ALL students to have a personal learning plan (PLP), and accountability.

I sincerely hope you will review the edits made by certified teachers who are considered content experts and are the best qualified to make decisions regarding the children of our great state.

Sincerely,

Michael Pelosi

██████████

From: [Adams, Angela](#)
To: [Jessica Murray](#)
Subject: RE: Oppose 306 Revisions
Date: Tuesday, April 23, 2024 3:28:18 PM
Attachments: [image002.png](#)
[image003.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12.

Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here

<https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator

New Hampshire Department of Education
Office of the Commissioners

Phone: 603-271-3144

25 Hall Street, Concord NH 03301

Email: angela.m.adams@doe.nh.gov



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From: Jessica Murray [REDACTED]
Sent: Thursday, April 11, 2024 1:31 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: Oppose 306 Revisions

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Dear Mrs. Addams,

I'm writing to you today to ask you to oppose the changes to NH's 306 minimum standards.

As an informed educator (23 years in SAU 19) and mother of two New Boston students, I feel the changes in wording from "shall" to "may" undermines our education system and encourages mediocre qualifications and oversight. Our children and parents deserve better. Parents should trust that the New Hampshire Board of Education will continue to require local school districts to provide the best class size, materials, and educators for our children. I don't want an uncertified teacher working with my dyslexic daughter. I want certified teachers and reading specialists knowledgeable of the latest research and best practices. As a parent, teacher, and taxpayer, I expect nothing less. These changes certainly would not meet federal guidelines for FAPE.

I have attended 306 local feedback meetings at Goffstown High School and have done extensive reading regarding the proposal. These changes are egregious and not keeping with the excellent educational standards citizens of New Hampshire and the greater Northeast expect.

Sincerely,
Jessica Murray
New Boston, NH



Dear Mrs. Addams,

I'm writing to you today to ask you to oppose the changes to NH's 306 minimum standards.

As an informed educator (23 years in SAU 19) and mother of two New Boston students, I feel the changes in wording from "shall" to "may" undermines our education system and encourages mediocre qualifications and oversight. Our children and parents deserve better. Parents should trust that the New Hampshire Board of Education will continue to require local school districts to provide the best class size, materials, and educators for our children. I don't want an uncertified teacher working with my dyslexic daughter. I want certified teachers and reading specialists knowledgeable of the latest research and best practices. As a parent, teacher, and taxpayer, I expect nothing less. These changes certainly would not meet federal guidelines for FAPE.

I have attended 306 local feedback meetings at Goffstown High School and have done extensive reading regarding the proposal. These changes are egregious and not keeping with the excellent educational standards citizens of New Hampshire and the greater Northeast expect.

Sincerely,
Jessica Murray



From: [Adams, Angela](#)
To: [Popovic, Rich](#)
Subject: RE: Opposition to proposed changes to ED 306
Date: Tuesday, April 23, 2024 3:37:34 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: Popovic, Rich [REDACTED]
Sent: Wednesday, April 3, 2024 11:47 AM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Opposition to proposed changes to ED 306

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

My name is Richard Popovic. I am the Chair of the Nelson School Board and am a parent of two children currently enrolled in our public schools. I am writing to express my opposition to and frustration with the some proposed changes to ED 306.

From the top down, our goal should be to support our students in every way possible and provide them with all of the tools we possibly can to succeed after graduation. Certain proposed changes to ED 306 do exactly the opposite of this. By watering down requirements and using vague language, we are doing our students, our state, and our society a grave disservice. Instead of ensuring that a public education in the state of New Hampshire will serve as a springboard for further achievement, these changes will instead hamstring our students as they move into the workforce, pursue further

education, or serve in our military. Instead of leading the way, these proposed changes demonstrate that the powers that be are more interested in scoring political points and pandering to a narrow world view. While neighboring states move ahead with forward-thinking proposals and programs, the NH Department of Education seems determined to drag us backward and squash our kids' chances of reaching their potential. Yet ramming these changes through would be seen as a victory by some. But that begs the question, who are the losers in this culture war? Our students.

Another victim of this crusade are taxpayers, especially from smaller towns. As funding remains woefully inadequate, and if state-level standards and resources are lessened even further, it will be up to the local boards and educators to do everything they can to fill that gap. This already happens, of course, but these proposed changes will make this hardship and disparity even worse. As we carefully craft budgets and present them to our taxpayers, doing as much as we can with as little as possible, these changes may force us to make cuts in areas every child should experience. They also could force taxpayers on tight budgets and fixed incomes to vote against school budgets, even though they have supported the school for years and consider it an essential part of the community. In small towns, these moments can drive wedges and hurt community character by forcing people to pick a side. But, in this time of us versus them, I have to wonder: is that the point? Because I can see no other reason for many of the changes proposed here.

As a parent, as a school board member, and as someone who cares about the future of New Hampshire, I ask you to reconsider any changes being presented today that will hurt our students' chances of success, deprive them of a full and robust education, and widen the disparity between what affluent towns can offer versus what more modest towns are able to provide. We have enough division in this country. Let's not use education, and the students of New Hampshire, as a wedge to widen that divide even more.

Thank you,
Richard Popovic
Chair, Nelson School Board
[REDACTED] d
Nelson, NH 03457

Environmental awareness message

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From: [Adams, Angela](#)
To: [REDACTED]
Subject: RE: Please Reverse Course on your Overhaul of the NH 306 Rules
Date: Tuesday, April 23, 2024 3:32:01 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator

New Hampshire Department of Education

Office of the Commissioners

Phone: 603-271-3144

25 Hall Street, Concord NH 03301

Email: angela.m.adams@doe.nh.gov



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From: Samantha Duk <[REDACTED]>
Sent: Thursday, April 11, 2024 9:12 AM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: Please Reverse Course on your Overhaul of the NH 306 Rules

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State Board of Education Coordinator Angela Adams,

A fellow parent made me aware of the movement to change the 306 rules in our great state. One of the things I love about NH is that it is a welcoming space for homeschoolers and public schools alike. However, the recent moves to legislative moves on public education are worrisome. The current 306 draft is poorly organized, confusing, and contains some concerning edits.

The proposed rules as currently written remove certification requirements for educators. They also fail to include feedback from representatives who can speak to the needs of

different school districts, as they were not asked to participate in the draft process. These proposed rules also fail to include feedback from parents and parent groups (like PTA/PTOs), as they were also prevented from participating in the draft process. Furthermore, the proposed rules disregard the concerns brought up by educators, parents, and experts, who have grave concerns with the current proposal.

I am urging you to reverse course on this massive rewrite. We will only accept revised 306 Rules that strengthen public education in New Hampshire.

Thank you,
Samantha

Samantha Duk

[REDACTED]

[REDACTED]

Newmarket , New Hampshire 03857

From: [Adams, Angela](#)
To: [REDACTED]
Subject: RE: Please Reverse Course on your Overhaul of the NH 306 Rules
Date: Tuesday, April 23, 2024 3:31:33 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator

New Hampshire Department of Education

Office of the Commissioners

Phone: 603-271-3144

25 Hall Street, Concord NH 03301

Email: angela.m.adams@doe.nh.gov



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From: Kara Sullivan [REDACTED]
Sent: Thursday, April 11, 2024 9:16 AM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: Please Reverse Course on your Overhaul of the NH 306 Rules

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State Board of Education Coordinator Angela Adams,

306 Rules are the requirements that dictate what makes a public school by addressing a long list of specifications, from what students will eat in the cafeteria, to how many kiddos are allowed in each classroom. The 306s are what define the foundation of public education in our state.

The current 306 draft is poorly organized, confusing, and contains some concerning edits.

The proposed rules as currently written remove certification requirements for educators.

They also fail to include feedback from representatives who can speak to the needs of different school districts, as they were not asked to participate in the draft process. These proposed rules also fail to include feedback from parents and parent groups (like PTA/PTOs), as they were also prevented from participating in the draft process. Furthermore, the proposed rules disregard the concerns brought up by educators, parents, and experts, who have grave concerns with the current proposal.

I am urging you to reverse course on this massive rewrite. We will only accept revised 306 Rules that strengthen public education in New Hampshire!

Kara Sullivan

[REDACTED]

[REDACTED]

Exeter , New Hampshire 03833

From: [Adams, Angela](#)
To: [REDACTED]
Subject: RE: Please Reverse Course on your Overhaul of the NH 306 Rules
Date: Tuesday, April 23, 2024 3:27:52 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator

New Hampshire Department of Education

Office of the Commissioners

Phone: 603-271-3144

[25 Hall Street, Concord NH 03301](#)

Email: angela.m.adams@doe.nh.gov



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From: Martha Burtis [REDACTED]
Sent: Wednesday, April 17, 2024 10:08 AM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: Please Reverse Course on your Overhaul of the NH 306 Rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

State Board of Education Coordinator Angela Adams,

306 Rules are the requirements that dictate what makes a public school by addressing a long list of specifications, from what students will eat in the cafeteria, to how many kiddos are allowed in each classroom. The 306s are what define the foundation of public education in our state.

The current 306 draft is poorly organized, confusing, and contains some concerning edits.

The proposed rules as currently written remove certification requirements for educators. They also fail to include feedback from representatives who can speak to the needs of

different school districts, as they were not asked to participate in the draft process. These proposed rules also fail to include feedback from parents and parent groups (like PTA/PTOs), as they were also prevented from participating in the draft process. Furthermore, the proposed rules disregard the concerns brought up by educators, parents, and experts, who have grave concerns with the current proposal.

I am urging you to reverse course on this massive rewrite. We will only accept revised 306 Rules that strengthen public education in New Hampshire!

Martha Burtis

[REDACTED]

[REDACTED]

Plymouth, New Hampshire 03264

From: [Adams, Angela](#)
To: [REDACTED]
Subject: RE: Please Reverse Course on your Overhaul of the NH 306 Rules
Date: Tuesday, April 23, 2024 3:33:46 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator

New Hampshire Department of Education

Office of the Commissioners

Phone: 603-271-3144

25 Hall Street, Concord NH 03301

Email: angela.m.adams@doe.nh.gov



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From: Michael Boucher <noreply@adv.actionnetwork.org>
Sent: Sunday, April 7, 2024 11:16 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: Please Reverse Course on your Overhaul of the NH 306 Rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

State Board of Education Coordinator Angela Adams,

306 Rules are the requirements that dictate what makes a public school by addressing a long list of specifications, from what students will eat in the cafeteria, to how many kiddos are allowed in each classroom. The 306s are what define the foundation of public education in our state.

The current 306 draft is poorly organized, confusing, and contains some concerning edits.

The proposed rules as currently written remove certification requirements for educators. They also fail to include feedback from representatives who can speak to the needs of different school districts, as they were not asked to participate in the draft process. These proposed rules also fail to include feedback from parents and parent groups (like PTA/PTOs), as they were also prevented from participating in the draft process. Furthermore, the proposed rules disregard the concerns brought up by educators, parents, and experts, who have grave concerns with the current proposal.

I am urging you to reverse course on this massive rewrite. We will only accept revised 306 Rules that strengthen public education in New Hampshire!

Michael Boucher

[REDACTED]

[REDACTED]y

Atkinson, New Hampshire 03811

From: [Adams, Angela](#)
To: [Nancy](#)
Subject: RE: Proposed 306 rules, etc
Date: Tuesday, April 23, 2024 3:36:04 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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-----Original Message-----

From: Nancy [REDACTED]
Sent: Wednesday, April 3, 2024 4:19 PM
To: Edelblut, Louis (Frank) <frank.edelblut@doe.nh.gov>; Adams, Angela <angela.adams@doe.nh.gov>
Subject: Proposed 306 rules, etc

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Dear Commissioner Edelbut,

I am a N.H. resident, property taxpayer and a graduate of a public high school (in N.H.) and the University of New Hampshire.

—School minimum standards must not be weakened. I disagree with the February 2024 proposed 306 rules. The state needs competent graduates able to meet it’s growing workforce needs. The changes made in these proposed rules seem to “water down” and weaken the requirements for

schools. Towns "may" rather than "shall" offer certain courses, require certified instructors, and maintain class size. Some rule changes appear to diminish a town's control over decisions regarding its public school functions.

—The legislature must have academic and financial oversight of the school voucher system now.

—Amending (raising) the income requirements for the voucher eligibility is wrong. It was initially meant to assist those residents whose incomes did not allow "choice" of educational systems for their children.

Respectfully,
Nancy Graves

██████████

Keene N.H. 03431

From: [Adams, Angela](#)
To: [Freiburger, Deb](#)
Subject: RE: Proposed Changes to the standards
Date: Tuesday, April 23, 2024 3:46:25 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator

New Hampshire Department of Education
Office of the Commissioners

Phone: 603-271-3144

25 Hall Street, Concord NH 03301

Email: angela.m.adams@doe.nh.gov



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Department of Education

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From: Freiburger, Deb [REDACTED]
Sent: Tuesday, April 2, 2024 2:39 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: Proposed Changes to the standards

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Hi Ms. Adams,

I have been teaching for 30 years in the state of NH. The proposed changes are dreadful. Please listen to NH educators' concerns about protecting strong standards for public schools that support equity in all school districts.

Thank you,

Deb Freiburger

[REDACTED]

Chester NH 03036

From: [Adams, Angela](#)
To: [Liz Ryan Cole](#)
Subject: RE: Protect 306 standards
Date: Tuesday, April 23, 2024 3:41:36 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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-----Original Message-----

From: Liz Ryan Cole <[REDACTED]>
Sent: Tuesday, April 2, 2024 10:13 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: Protect 306 standards

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

I am the mother of four and the grand mother of five. Two of my grand sons attend school in NH. I also a business owner and tax payer in NH. I am appalled to learn that NH is dumbing down public schools by cutting back basic standards. That will NOT help us maintain a robust economy - something Republicans tell voters they understand how to do.

Liz Ryan Cole
[REDACTED]

From: [Adams, Angela](#)
To: [Tia Winter](#)
Subject: RE: Public Comment of Lebanon School Board
Date: Tuesday, April 23, 2024 3:38:50 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator

New Hampshire Department of Education
Office of the Commissioners

Phone: 603-271-3144

25 Hall Street, Concord NH 03301

Email: angela.m.adams@doe.nh.gov



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From: Tia Winter <[REDACTED]>
Sent: Wednesday, April 3, 2024 9:29 AM
To: Shea, Julie <Julie.R.Shea@doe.nh.gov>; Adams, Angela <angela.adams@doe.nh.gov>; [REDACTED]
[REDACTED]
Subject: Public Comment of Lebanon School Board

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Hello Julie and Angela,

Due to the storm, members of the Lebanon School Board will not be able to attend today's hearing in-person. We are providing you with our public comment regarding the topic of today's meeting to submit electronically.

[LSB Public Comment re: 306 Minimum Standards Draft](#)

Thank you for your time with this.

--

Tia Winter
she/her/hers
School Board Member

The Right-To-Know Law provides that most e-mail communications, to or from Lebanon School District employees regarding the business of the School District, are government records available to the public upon request. Therefore, this e-mail communication may be subject to public disclosure. This e-mail is intended solely for the person or entity to which it is addressed and may contain confidential and/or privileged information. Any review, dissemination, copying, printing, or other use of this e-mail by persons or entities other than the addressee is strictly prohibited. If you receive this e-mail in error, please notify the sender immediately and delete the material from any computer.

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From: [Adams, Angela](#)
To: [Charlene Puzzo](#)
Subject: RE: RSA 193E - 306 Rules
Date: Tuesday, April 23, 2024 3:34:06 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: Charlene Puzzo [REDACTED]
Sent: Friday, April 5, 2024 3:10 PM
To: Edelblut, Louis (Frank) <frank.edelblut@doe.nh.gov>; Adams, Angela <angela.adams@doe.nh.gov>
Subject: RSA 193E - 306 Rules

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I am **VERY** concerned with the changes being proposed to the 306 Rules by Frank Edelblut to NH Board of Education as a precursor to reducing the quality of education to students in New Hampshire.

I am the mother of 2 children and 5 grandchildren all who were educated in New Hampshire public schools, went on to college, and am successful in life. This was due to the curriculum, high standards and accountability imperative to ensure they received a good, quality education taught by certified educators.

This should be true whether students are in public school, charter, home school or private. Accountability is **imperative** to ensure every student has learned the stated criteria defined by NH Board of Education. This will not be attained by **removing** requirement that certified educators are to validate the knowledge and skills have been mastered in order to receive high school credit or to be promoted to next grade school level.

School districts need to have flexibility to introduce programs comprehensive and meet student needs but not to remove requirements for content of core subjects and electives. Core subjects and electives should not be made optional as NH Department of Education is proposed but continue to be mandatory. Therefore, 'shall include' cannot be changed to 'may include' in all content areas.

In today's world, our students need to be better prepared for life after school, not less, and what is being proposed is not going to achieve this. If allowed to be passed future NH students will be left behind for what - saving dollars on property taxes in short-term? Long-term it will cost much more to the students who were short-changed in their education.

*Charlene Puzzo
Meredith, NH*

From: [Adams, Angela](#)
To: [Matthew Vincent](#)
Subject: RE: Rule 306
Date: Tuesday, April 23, 2024 3:37:56 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: Matthew Vincent <[REDACTED]>
Sent: Wednesday, April 3, 2024 10:21 AM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: Rule 306

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Good Morning,

I am a concerned parent of 2 that wanted to make my opinion known on the Rule 306 changes. While i don't know the details of the changes and probably wouldn't be able to understand the legalese. i just want to say public education in NH should remain at high standards for ALL students.

Thank You

Matthew Dassatti
Laconia, NH

From: [Adams, Angela](#)
To: [THERESA Curtis](#)
Subject: RE: SBoE - 306 standards
Date: Tuesday, April 23, 2024 3:46:07 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: THERESA Curtis [REDACTED]
Sent: Tuesday, April 2, 2024 3:33 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: SBoE - 306 standards

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Dear State Board of Education.
I am writing to express my strong concerns regarding the potential amendment and reduction of NH 306 standards for public education. As a concerned citizen, I urge the State Board of Education to prioritize and protect these standards for the betterment of our education system in New Hampshire.

It is crucial that we maintain high standards in public education to ensure that our students receive the quality education they deserve. Any efforts to diminish these standards would have a detrimental impact on the future of our students and the overall education system in our state as well as diminishing property values while

grossly increasing the property taxes in some communities.

I implore you to take action to safeguard NH 306 Standards and prevent any reduction of these essential benchmarks. Our students' success and the integrity of our education system depend on it.

Thank you for your attention to this urgent matter. I trust that you will do everything in your power to uphold and protect our public education standards.

Sincerely,
Theresa Curtis
Goffstown, NH

From: [Adams, Angela](#)
To: [Michelle Springer](#)
Subject: RE: Stop This Attempt
Date: Tuesday, April 23, 2024 3:36:34 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
[25 Hall Street, Concord NH 03301](#)
Email: angela.m.adams@doe.nh.gov



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From: Michelle Springer [REDACTED]
Sent: Wednesday, April 3, 2024 3:15 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: Stop This Attempt

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Stop the attempt to gut our 306 standards and the future of our children, teachers, and communities.

Dear Members of the Education Board,

My name is Ritu Budakoti, and I serve as a science educator in the Keene School District. As both an educator and a parent within this district, I hold a deep-seated belief in the value of our public education system and the curriculum it offers our youth.

I speak not only for myself but on behalf of many dedicated educators who share my passion for guiding students through their learning journeys. Every day, we strive to adapt and refine our teaching methods to ensure that all students can access and benefit from the curriculum. Let's not forget that the standards provide us with a necessary framework, guiding our efforts and delineating the path toward educational excellence. In the proposed science content area I noticed that a lot of content standards were struck off. "All progress begins by telling the truth", but this whole thing seems to feel rushed and lacks transparency. Until March 2024, when I was able to attend one of the working sessions organized by Christine Downing to provide my inputs, I felt there was no other time or an opportunity given to educators like myself to express or bring forth their inputs.

As a science educator, I am particularly invested in ensuring that our curriculum fosters a deep understanding of scientific principles from K-12. It is imperative that we nurture students' natural curiosity and encourage them to think like scientists, analyzing data and forming reasoned conclusions. By instilling these critical thinking skills early on, we equip our students to tackle the challenges of the future and become lifelong learners.

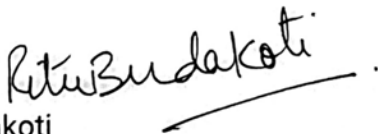
Looking ahead, it is clear that the strength of our public education system is paramount to the success of our nation. We must heed the recommendations of frontline educators and work towards enhancing our standards instead of degrading them. It is critical that we pay close attention to what changes/revisions are proposed by educators. As a frontline we know we work in the field. I suspect that failure to do so risks depriving our students of the meaningful context they need to thrive in an ever-evolving world.

In conclusion, I urge the Education Board to prioritize the enhancement of our public education system by providing more time and opportunities for educators to review and provide inputs. By investing in robust standards and curriculum, by giving consideration to the proposed revisions made by New Hampshire Educators, we will empower our youth to become informed, engaged citizens capable of shaping a brighter future for us all. Please listen to your educators!!!

Thank you for your attention and consideration.

Sincerely,

Ritu Budakoti
Teacher

A handwritten signature in black ink that reads "Ritu Budakoti". The signature is written in a cursive style and is positioned to the right of the typed name "Ritu Budakoti". A horizontal line is drawn under the signature.

From: [Adams, Angela](#)
To: [Susan Holcombe](#)
Subject: RE: Testimony against currently proposed ED306 rules
Date: Tuesday, April 23, 2024 3:33:21 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator

New Hampshire Department of Education

Office of the Commissioners

Phone: 603-271-3144

25 Hall Street, Concord NH 03301

Email: angela.m.adams@doe.nh.gov



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From: Susan Holcombe <[REDACTED]>
Sent: Wednesday, April 10, 2024 9:09 PM
To: Shea, Julie <Julie.R.Shea@doe.nh.gov>; Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Testimony against currently proposed ED306 rules

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Kindly convey to the NH State Board of Education my request that they discard the current Department of Education proposed changes to the ED306 rules and start again with a transparent and professional approach that serves the interests of the children of New Hampshire. My views are included in the excerpt below, a version of which was published as an OpEd in the Valley news on April 4, 2024.

Thank you,
Susan Holcombe
Hanover NH

A version of this was published in the Valley News on April 4, 2024.

Rules Changes Threaten NH Schools

Do you think that policy governing how our schools run is made by local, elected school boards and perhaps by the legislature? Think again. We are about to see some radical changes in rules for NH schools. These are changes that will occur largely under the radar through revision of the ED306 rules, which are administrative rules that guide the implementation of education law. ED306 rules set standards and limits so that all public schools operate by the same rules and assure that all students receive an adequate education.

What's the problem? Despite allocating \$75,000 to an outside contractor to develop a draft of the revised rules, the Department of Education has persisted in developing its own version of the rules, ignoring the inputs of public school teachers, administrators and parents. Reading the proposed ED306 rules and comparing them to the existing rules is a mind-numbing experience—for which most of us lack the time. What should jar us awake are the many concerns of educators that, under the new rules, local school board control is ceded to the state; educational standards are eroded by reducing required qualifications for teachers; legitimizing for credit online courses for which there is no accountability; eliminating class size minimums, and much more.

The last opportunity for public input may pass quietly. The NH State Board of Education will hold a public hearing on April 3 in Concord at 1:00 pm on the first half of the ED306 proposed rules. A hearing on the second half of the proposed rules is tentatively scheduled for April 11. It is easy to be pessimistic. The NH Department of Education and the State Board of Education are not likely to respond to any testimony recommending changes or reconsiderations of the ED306 rules.

Is that skepticism justified? Look at the history of the development of the draft rules. The NH Department of Education engaged The Center for Competency-Based Learning (CCBL) to 'facilitate a revision' of the ED306 rules and write a first draft. In 2022 a NH think tank was able to look at that draft. They noted that the draft proposed a significant overhaul of the rules that would have significant implications for public schools. The NH Education Department submitted this first draft to the State Board of Education—which did give a pause to allow time for public input. CCBL did take on revision and organized 13 listening sessions around the state and, for the first time, met with NH's largest teachers' union and with other educational professionals. At the 13 listening sessions teachers, administrators, parents and others overwhelmingly expressed multiple concerns about hollowed out standards, local school board loss of control, and many loopholes that would allow the NH Education Department to weaken public education.

By some accounts, CCBL took the listening sessions content into account as they prepared

Draft 2 of the ED306 rules, submitted to the Department of Education in January of 2024. The Department is under no obligation to accept the CCBL draft. It is only advisory. The document that the Department presented to the State Board of Education on February 15 looks quite different from the second CCBL draft. The Reaching Higher New Hampshire (RHNH) policy director has analyzed the Department version and its differences with the current rules. Beyond the six primary concerns about loss of local control and hollowed out standards, Christine Pretorius worries that the NHED proposed rules are a mechanism for changing how New Hampshire funds an adequate education. (Remember that New Hampshire has yet to deal with the consequences of the ConVal decisions that mandate increases in state funding for an adequate education).

It is hard to visualize the impact of the proposed ED306 rules on students and school districts. In a webinar, Reaching Higher New Hampshire gave examples of how the new rules might affect education in a property poor versus a property rich town.

<https://reachinghighernh.org/wp-content/uploads/2024/03/Minimum-Standards-Public-Briefing-March-2024-1.pdf> Here are some examples they offer:

Jack attends a rural high school in New Hampshire. His school is the center of his community – despite a lack of state funding, voters pass their budget each year, but it’s getting difficult.

Mia attends a well-funded suburban high school in New Hampshire. Her school has lots of resources, and last year, she was able to take a field trip to Europe to study Spanish.

Jack’s school board cuts courses and offers online “learning opportunities,” but he’s struggling because he doesn’t have a teacher he can go to when he has a question about the recorded lesson.

In Jack’s relatively small high school, his physics teacher also teaches algebra as a minor assignment. After the passage of the rules, his district has to hire a part-time, uncertified teacher to teach math instead. Because Jack’s teacher can’t have a full course load, he leaves the school for a neighboring district.

Mia’s school board is trying to balance the changes in the rules and what it means for their library staff: they want to continue to offer courses in media literacy and critical research skills, but the rules shift the role to a position that curates their library collection.

Now that class size requirements have been eliminated, Jack’s school board has decided to merge two elementary school classes in his district. Now, the second grade class in Jack’s school district will have 34 children for one teacher.

Mia’s classmate, who would be a first-generation college student and has dreams of becoming a nurse practitioner, is unsure about what’s next after high school. But with the removal of her

school's career education program, she and her family aren't sure how to navigate the complex college application process.

In early April, the Commissioner, who lacks classroom experience, and the State Board of Education are likely to forge ahead with their version of the rules changes. Students and School Boards will watch the consequences play out over the coming years.

Susan Holcombe
Hanover NH

From: [Adams, Angela](#)
To: [Wilson Garcia](#)
Subject: RE: Upcoming Public hearing April 2 and 11, 2024 of the NHDOE Ed 306 Administrative Rules for Public School Approval and changes to the Minimum Standards for Public School Approval
Date: Tuesday, April 23, 2024 3:36:11 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
25 Hall Street, Concord NH 03301
Email: angela.m.adams@doe.nh.gov



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From: Wilson Garcia <[REDACTED]>
Sent: Wednesday, April 3, 2024 4:08 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: Upcoming Public hearing April 2 and 11, 2024 of the NHDOE Ed 306 Administrative Rules for Public School Approval and changes to the Minimum Standards for Public School Approval

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Dear Angela Adams:

My name is Wilson García, and I am a NH state World Language Educator at Plymouth State University who resides in Grafton County. I am writing to urge you to review the comments and suggested wording submitted by Christine Downing per the educator review sessions. Close to 300 certified teachers reviewed these proposed changes and have put forth their testimony.

Here are just a few concerns that the New Hampshire World Language Educators would like to share with you in hopes that you will revise these Rules and support a full scope for an inclusive and competent public education program.

1. Reducing student electives from 6 to 2.5 is a danger and detriment to students and educators
2. Removal of career ed. programs will have a large impact on hundreds of students statewide.
3. Alternative courses of study: needs review to maintain quality curriculum and instruction.

We as educators have deep concerns regarding: Requirements vs expectations, Rhetoric like may vs shall, Program vs curriculum, Student right to choose electives , Removal of class size capping , Local vs State control , Defining Adequate Education, ALL students to have a Personal Learning Plan (PLP), Accountability.

Sincerely,

Dr. Wilson Garcia

[REDACTED]

[REDACTED]

[REDACTED]

Email: [REDACTED]

From: [Adams, Angela](#)
To: [Rachel Petillo](#)
Subject: RE: Upcoming Public hearing April 2 and 11, 2024 of the NHDOE Ed 306 Administrative Rules for Public School Approval and changes to the Minimum Standards for Public School Approval.
Date: Tuesday, April 23, 2024 3:34:44 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator

New Hampshire Department of Education

Office of the Commissioners

Phone: 603-271-3144

25 Hall Street, Concord NH 03301

Email: angela.m.adams@doe.nh.gov



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From: Rachel Petillo <[REDACTED]>
Sent: Friday, April 5, 2024 9:38 AM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: RE: Upcoming Public hearing April 2 and 11, 2024 of the NHDOE Ed 306 Administrative Rules for Public School Approval and changes to the Minimum Standards for Public School Approval.

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April 4th, 2024

Dear Angela Adams:

My name is Rachel Petillo and I am a NH state World Language Educator who resides in Rockingham County. I am writing to urge you to review the comments and suggested wording submitted by Christine Downing per the educator review sessions. I, along with almost 300 other certified teachers, reviewed the current proposed changes in March and made important edits to them.

Here are just a few concerns that the New Hampshire World Language Educators would like to share with you in hopes that you will revise these rules and support a full scope for an inclusive and competent public education program.

1. Reducing student electives from six to 2.5 is a danger and detriment to students and educators
2. Removal of career ed. programs will have a large impact on hundreds of students statewide.
3. Alternative courses of study needs review to maintain *quality* curriculum and instruction.

We as educators have deep concerns regarding: requirements vs expectations, rhetoric like may vs. shall, program vs. curriculum, student right to choose electives, removal of class size capping, local vs state control, defining adequate education, ALL students to have a personal learning plan (PLP), and accountability.

I sincerely hope you will review the edits made by certified teachers who are considered content experts and are the best qualified to make decisions regarding the children of our great state.

Sincerely,
Rachel Petillo

Salem School District

[REDACTED]
[REDACTED]

From: [Adams, Angela](#)
To: [Brooke D'Entremont](#)
Subject: RE: Upcoming Public hearing April 2 and 11, 2024 of the NHDOE Ed 306 Administrative Rules for Public School Approval and changes to the Minimum Standards for Public School Approval.
Date: Tuesday, April 23, 2024 3:47:22 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
25 Hall Street, Concord NH 03301
Email: angela.m.adams@doe.nh.gov



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From: Brooke D'Entremont <[REDACTED]>
Sent: Tuesday, April 2, 2024 1:44 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: Upcoming Public hearing April 2 and 11, 2024 of the NHDOE Ed 306 Administrative Rules for Public School Approval and changes to the Minimum Standards for Public School Approval.

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April 2, 2024

RE: Upcoming Public hearing April 2 and 11, 2024 of the NHDOE Ed 306 Administrative Rules for Public School Approval and changes to the Minimum Standards for Public School Approval.

Dear Angela Adams:

My name is Brooke D'Entremont and I am a NH state World Language Educator who teaches Spanish and French at Lebanon Middle School. I am a resident of Lebanon, NH in Grafton

County. I am writing to urge you to review the comments and suggested wording submitted by Christine Downing per the educator review sessions. Close to 300 certified teachers reviewed these proposed changes and have put forth their testimony.

Here are just a few concerns that the New Hampshire World Language Educators would like to share with you in hopes that you will revise these Rules and support a full scope for an inclusive and competent public education program.

1. Reducing student electives from 6 to 2.5 is a danger and detriment to students and educators
2. Removal of career ed. programs will have a large impact on hundreds of students statewide.
3. Alternative courses of study: needs review to maintain quality curriculum and instruction.

We as educators have deep concerns regarding: requirements vs expectations, rhetoric like may vs shall, program vs curriculum, student right to choose electives, removal of class size capping, local vs State control, defining Adequate Education, ALL students having a Personal Learning Plan (PLP), and accountability.

Sincerely,
Brooke D'Entremont

██████████
Lebanon, NH 03766
██████████

From: [Adams, Angela](#)
To: [Rachel Roper](#)
Subject: RE: Upcoming Public hearings April 3 & 11, 2024 Ed 306 Administrative Rules for Public School Approval and changes to the Minimum Standards for Public School Approval.
Date: Tuesday, April 23, 2024 3:38:09 PM
Attachments: [image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator

New Hampshire Department of Education

Office of the Commissioners

Phone: 603-271-3144

25 Hall Street, Concord NH 03301

Email: angela.m.adams@doe.nh.gov



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Department of Education

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From: Rachel Roper <[REDACTED]>
Sent: Wednesday, April 3, 2024 10:11 AM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: Upcoming Public hearings April 3 & 11, 2024 Ed 306 Administrative Rules for Public School Approval and changes to the Minimum Standards for Public School Approval.

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Dear Angela Adams:

My name is Rachel Roper and I am a NH state Library Media Specialist/ teacher. I am a resident of Cornish, NH in Sullivan County. I am writing to urge you to review the comments and suggested wording submitted by Christine Downing per the educator review sessions. Close to 300 certified teachers reviewed these proposed changes and have put forth their testimony.

Here are just a few concerns that I would like to share with you in hopes that you will revise

these Rules and support a full scope for an inclusive and competent public education program.

1. Reducing student electives from 6 to 2.5 is a danger and detriment to students and educators
2. Removal of career ed. programs will have a large impact on hundreds of students statewide.
3. Alternative courses of study: needs review to maintain quality curriculum and instruction.

We as educators have deep concerns regarding: requirements vs expectations, rhetoric like may vs shall, program vs curriculum, student right to choose electives, removal of class size capping, local vs State control, defining Adequate Education, ALL students having a Personal Learning Plan (PLP), accountability.

Sincerely,

Rachel Roper

Rachel R. Roper
Library Media Specialist
Lebanon Middle School



What I'm reading...



Leadership Motivation Spirit
Pride Respect Integrity Dependability Excellence

The Right-To-Know Law provides that most e-mail communications, to or from Lebanon School District employees regarding the business of the School District, are government records available to the public upon request. Therefore, this e-mail communication may be subject to public disclosure. This e-mail is intended solely for the person or entity to which it is addressed and may contain confidential and/or privileged information. Any review, dissemination, copying, printing, or other use of this e-mail by persons or entities other than the addressee is strictly prohibited. If you receive this e-mail in error, please notify the sender immediately and delete the material from any computer.

April 5, 2024

RE: Upcoming Public Hearing 11, 2024 NHDOE Ed 306 Administrative Rules for Public School Approval - *Minimum Standards for Public School Approval*

Dear Angela Adams:

I hope this letter finds you well. Kindly permit this letter to serve as written testimony for the upcoming hearing on April 11, 2024, regarding the minimum standards for public school. My name is Eva Mohr, and I am a NH state World Language Educator who resides in Strafford County. I am writing to urge you to review the comments and suggested wording submitted by Christine Downing as per the Educator Review Sessions. Close to 300 certified educators reviewed these proposed changes and have put forth their testimony as well.

As NH state certified educators, we teachers have deep concerns regarding some of the language contained namely: Requirements vs expectations, May vs shall, Program vs curriculum, Student right to choose electives, Removal of class size capping, Local vs State control, Defining Adequate Education, ALL students to have a Personal Learning Plan (PLP), Accountability.

Here is a short list that the New Hampshire World Language Educators would like to share with you in hopes that you will revise these Rules and support a full scope for an inclusive and competent public education program:

1. Reducing student electives from 6 to 2.5 presents a clear and present danger to students and educators as this is a vast decrease with detrimental effects.
2. Removal of career ed. programs will have a large negative impact on hundreds of students statewide.
3. Alternative courses of study necessitate a review to maintain quality curriculum and instruction.

Your attention to this important matter is vital to the future of our children in the state of New Hampshire and your time is greatly acknowledged and appreciated.

Sincerely,

Eva Mohr
World Language Educator
Strafford County

My name is Sean Parr and I am on the Manchester School Board where I Chair the Education Legislation Committee. Today I am speaking on behalf of the Manchester School Board, which has authorized me to express our opposition to the proposed changes to New Hampshire's minimum standards for public education. We as a Board have expressed our concerns several times, via letters, listening sessions, and in-person. The proposed 306 revisions threaten to undermine the education all our students deserve.

To begin with, the State Board of Education has ignored our concerns, and those of hundreds of constituents who have also participated in listening sessions across the state. In spite of reaching a consensus draft version that accounted for these concerns and had the support of many education stakeholders, the State Board of Education chose to accept a version that lacks broad public support. The most substantive and concerning revisions remain in the document. It's time to listen to our educators, school boards, and citizens. Strengthening our public schools has broad public support. Providing the best education for all students has broad public support. These are the non-partisan values that should be guiding the revision of our minimum standards.

Instead, the changes, if implemented, will significantly weaken public education in New Hampshire, lowering standards. In fact, the proposed 306 revisions remove requirements that protect our students, such as class size maximums, teacher certification, differentiated instruction, and basic instructional standards. The proposed revisions also weaken the purpose and structure of schools as well as lowering the expectations for all students. And the revisions subvert the authority of local schools boards.

Finally, these revisions threaten to hurt our students by redefining and watering down what is considered an essential, required, and adequate education in New Hampshire. We want to maintain high standards, high expectations for our students' learning. We want to close learning gaps from the pandemic, raise graduation rates, raise test scores. We want to ensure all students have access to the best education possible. But these 306 revisions will worsen inequities across the state because weakening minimum standards weakens what is considered an adequate education. And weakening how we view adequacy will significantly reduce the funding that public school districts qualify for. By lowering standards and reducing requirements and expectations, the State would disavow its obligation to adequately fund public schools, and this has serious implications for the future of public education in New Hampshire.

Even with so many voices speaking out against these revisions, I personally remain skeptical that you will adjust course. The onus is on you to revise the Ed 306s in a way that incorporates the feedback we have offered. Until then, the only conclusion that remains is that this process of listening forums, working groups, consultants, and public hearings has all been for show. Until then, we can only conclude that you do not want to ensure the best education for all NH students. Until then, we have to doubt your commitment to your mission: "to ensure that every individual acquires the skills and knowledge to succeed."

NHCTA, the statewide professional association representing Career and Technical Education administrators acts on a statewide level to create, support, and advocate for the most robust environment for the success of New Hampshire CTE. We serve 400 teachers and staff statewide and support nearly 9,500 students. We are compelled to testify today as we are concerned about the direction of the current Ed 306 Minimum Standards for Public School Approval. As currently drafted in the February 15th, 2024 proposal these rules will have a detrimental impact on the delivery of career and technical education statewide.

Our concerns fall into 3 major themes.

1. Barriers that will prevent the successful implementation of CTE for NH students and families.
2. The lack of clarity that sits in the current proposed rules.
3. Significant issues with equity and access for each and every student in the Granite State.

Evidence/Citation Supporting Each Theme

1. Barriers that will prevent the successful implementation of CTE for NH students and families. - Enhancing access to high quality CTE has been a policy priority of the NHED as well as our state legislature for the last several years. The current proposal of the Minimum Standards dated February 15, 2024 reverses and consequently impacts the successful implementation of CTE in many ways. While there are numerous examples of problems in the current rule proposal NHCTA prioritizes the following issues under this theme:
 - a. The complete elimination of “minor assignment” under Provision of Staff and Staff Qualifications. The ability for a school principal or CTE Director to assign a professional educator outside their certification area will limit the programming and flexibility CTE Centers need to deliver high quality programs. It is not unusual for an engineering teacher to have a minor assignment to teach math or a criminal justice teacher to teach a class in law or civics. These teachers have the requisite knowledge to teach outside their certification areas enabling CTE centers and their high schools to offer meaningful programming to students. This flexibility and local decision making is essential for centers and schools.
 - b. “Required Courses of Study,” under this section of rules a new “course of study” is proposed for the 20 credit high school diploma. Many students enrolled in CTE complete high school with the 20 credit diploma. As currently drafted, the new required course of study alters electives from 6 to 2.5. This change is dramatic for students. The impact on CTE will be felt across all centers. Students enrolled in CTE will no longer be able to graduate with a 20 credit diploma as a CTE pathway assumes more than 2.5 elective credits. The impact of this policy change could impact enrollments, student voice and choice, and more importantly deter students from pursuing programming aligned to their passions.
 - c. Lastly, the latest draft requires a new school district policy which states, “How high school credit is awarded to students based upon demonstrated proficiency of competencies regardless of age and enrollment status.” Will CTE centers along with high schools be awarding credit to students for learning in programs they are not enrolled in? How is CTE credit awarded without enrollment? Does this provision align with requirements under Perkins V? Perkins V requires CTE concentrators to complete at least two courses in a single program or program of study. This new policy will critically impact the quality of CTE programs in NH and likely has significant implications to federal regulations under Perkins V and the associated funding.

2. Lack of Clarity - Rules by their very nature are intended to offer clarity and not confusion. This set of rules is designed to support schools in implementing minimum standards consistent across all schools. Instead they create confusion and offer very little direction to the people charged with implementing them - school and district administrators.
 - a. Vague language is used with limited definitions and little to no context. Examples of this includes terminology such as “learning opportunities” as a replacement for “courses and programs,” the removal of “teaching” and replacing it with “facilitating learning.” These are just a few examples but they invite quite a bit of ambiguity for school/district leaders and our educators.
 - b. There are also inconsistent edits in the current document. “Programs of study” have been eliminated and replaced with “course of study” yet programs of study continue to be referenced under ED 306.21. Again, this is just one example but demonstrates these rules have inconsistencies, contradictions and lack of clarity underscoring that they are not ready to be adopted (Special Note - the strategy here is to communicate the message that the rules are not ready and to delay the process).
3. Access and Equity

Our final area concern involves access and equity for our students, their families and our communities. Our three themes are interrelated and the detail we offer in themes 1 and 2 raise our concerns about access and equity. The Minimum Standards for Public School Approval are foundational standards that all public schools must follow. The proposed changes create the real opportunity for unequal application of these rules widening the opportunity gap from one community to another. Additionally, the current proposal seems to make most programming optional.

The overall effect of these changes is stripping of quality and credibility from the attainment of a high school diploma in New Hampshire.

From: [Adams, Angela](#)
To: [Kris Flather](#)
Subject: RE:
Date: Tuesday, April 30, 2024 3:17:33 PM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12.

Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Kris Flather [REDACTED]
Sent: Tuesday, April 30, 2024 2:50 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject:

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Tuesday, April 30, 2024

Please share the following comments with Edelblut, Cline, and the members of the New Hampshire Board of Education.

As a retired teacher, and now a grandparent of two students in New Hampshire public schools, I am outraged by the deceit, the outright lies, and most of all, the anti-democratic agenda so obviously promoted in the 306 revisions. Cline has a mission to impose his own conservative philosophy onto New Hampshire's educational system, thereby harming public schools in his fervor to transfer badly needed public money to private, often religious schools and homeschooling.

If parents want "education freedom" it is their right. But first it is the right and duty of the state to fund public schools to provide a good education to **every** public school student. How is that possible when millions of dollars are taken from public school funds to pay for the Education Freedom Accounts (EFA)? Why is it even necessary when more than 80% of private school students were already funded by their families? Why must we pay for them to have a free private education at the cost of the quality of public education? Public schools are already

underfunded. For exactly what reason do the 306 revisions steal more funds from them?

Why did Commissioner of Education Edelblut ignore educators' input, lie about doing so, then undercut their ability to be effective by underfunding teachers even further for the sake of private schools (likely leading to larger class sizes and fewer teachers)?

Why is there no apparent oversight of the private school curriculums? For all we know, they could be starting to foment another insurrection by promoting either religious or political ideas that contradict our constitution.

Their idea of "education freedom" is anything but freedom. It is anti-democratic by ignoring citizens' and particularly educators' input, and most importantly, harmful to public schools. The 306 revisions rob public schools to support private schools we have no obligation to support. The revisions violate the idea of separation of church and state, a founding principle of this country. As if that weren't enough, major policy changes are the responsibility of the legislature, not the Department of Education. Neither Edelblut nor Cline had authority to create the Education Freedom Accounts (EFA) in the first place. How was it done? According to the Valley News, the program was "cleverly slipped into law through its inclusion" in the 2021 state budget.

Sounds deceitful to me.

Kris Flather

Hanover, NH

From: [Nicholas Germana](#)
To: [Adams, Angela](#)
Subject: 306 rules
Date: Wednesday, April 3, 2024 4:44:31 PM
Attachments: [Outlook-dllrhwnr.png](#)
[306 rules.docx](#)

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Good afternoon.

Please find attached my written testimony of the 306 draft rules.

Respectfully,

Nick Germana
State Representative
Keene, Cheshire 1
Environment and Agriculture Committee



Those who can make you believe absurdities, can make you commit atrocities. -Voltaire

Members of the New Hampshire Board of Education,

Reading through the draft rules, I cannot avoid the conclusion that the proposed changes are tied to Commissioner Edelblut's professed inability (April 2023) to define what a constitutionally mandated "adequate" education would consist of, as well as the recent Superior Court ruling regarding state funding for public education. The primary purpose of the proposed changes would seem to be to lower the bar so far that "adequacy" could be defined in such a way as to justify lower levels of per pupil spending. The result of these changes would be to exacerbate inequities between school districts by tacitly encouraging communities with a smaller tax base to eliminate programs and services that will continue to be available to more affluent communities.

When specific changes are made to the language of the rules, one must always ask what motivation lies behind the decision. While it is understandable that a competency-based curriculum would seek to provide an array of educational opportunities for students, the change in the draft rules to ill-defined "learning opportunities" falls far short of constituting a standard that can be applied across the state. I cannot imagine a professional educator using such ambiguous language to define what is supposed to be a standard. Perhaps I should not be surprised, as the draft rules appear to envision a significantly reduced role for professional educators in defining what criteria should be used to define competency and which assessment tools should be used to evaluate it. All of this appears aimed to not just encourage but actively facilitate a dramatic increase in "learning opportunities" outside of schools overseen by people who are not professional educators.

I am profoundly concerned about the removal in 306.06(a)(1) of the language regarding "the acknowledgement of diversity." I understand that some will argue that the language in 306.06(a)(4) about nondiscrimination implicitly covers diversity, but (by definition) we cannot begin to discuss discrimination without acknowledging diversity. I cannot credibly conceive of an argument for the removal of the reference to diversity that is not driven by political considerations.

Among the most troubling changes in the proposed rules is the elimination of an actual standard for class sizes. This will unquestionably lead to much larger class sizes and poorer educational experiences for kids in our less affluent communities. Granite Staters, already overburdened by property taxes because of the state's refusal to live up to its obligation to properly fund public education, will find it easier to cut school funding because not as many staff will be needed as class sizes grow.

I am puzzled and disturbed by the change in 306.19 away from "comprehensive" psychological services at a time when our students are struggling more than ever with anxiety and a wide variety of mental and emotional disorders. Why would the work of school psychologists no longer be expected to conform to the standards established by the National Association of School Psychologists? I have to assume the answer is that once the work of school psychologists has been hollowed out, as it is in the changes proposed in this section, they will no longer be able to meet NASP's standards. The striking of section (f) reinforces this

impression. This appears, once again, to be a lowering of standards designed to minimize the definition of “adequacy” at the expense of the well-being of our children.

I am likewise troubled by the changes in 306.35 to school counseling services. Why would we not require school counselors to conform to the professional standards articulated by the American School Counselor Association? Is this because requiring them to do so adds too much of burden to our definition of adequacy?

These are not my only concerns about the proposed rules, just the ones that alarm me most. Because of our dysfunctional school funding model, we already see vast systemic inequities between schools in New Hampshire. These proposed rules will make that situation worse and, frankly, almost appear designed to do so.

Respectfully,

A handwritten signature in blue ink, reading "Nicholas Germana". The signature is written in a cursive style and is enclosed within a thin black rectangular border.

Rep. Nicholas Germana
Keene, Cheshire 1

From: [Adams, Angela](#)
To: [Ellen Lewis](#)
Subject: RE: 306 Rules Concern
Date: Monday, April 29, 2024 3:21:51 PM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12.

Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Ellen Lewis <[REDACTED]>
Sent: Monday, April 29, 2024 3:05 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: 306 Rules Concern

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Dear Ms. Adams,

I am neither an educator nor a parent but I am a taxpayer and a firm believer in public education which is why I am writing to express my concerns about the proposed revision to 306 Rules.

Education Freedom Accounts reduce funding to public schools diluting an already limited pot. Further, it will likely be detrimental to educator to student ratios. The change to the 306 Rules needs in-put from educators and school boards at the local level (where much of the funding comes from). All New Hampshire school aged children deserve the opportunity of an education free from bias.

Although not a part of 306 Rules (to my knowledge) but I am also in favor of requiring standard vaccinations for any child attending public schools. Vaccines are a key to public health.

Thank you for your attention; please share the above with Mr. Edelblut and Mr. Cline.

Sincerely,

Ellen Lewis
Enfield, NH

From: [Adams, Angela](#)
To: [Kathy Malsbenden](#)
Subject: RE: 306 Standards
Date: Tuesday, April 30, 2024 12:33:54 PM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12.

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Thank you,
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Kathy Malsbenden [REDACTED]
Sent: Monday, April 29, 2024 10:05 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Cc: [REDACTED]
Subject: 306 Standards

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Dear Ms. Adam, Commissioner Edelblut and Board Members,

I am reaching out to voice my strong opposition to the proposed 306 Education Standards. After discussing with fellow educators familiar with the Competency Based Education model, it's disheartening to note how diluted these standards appear in their current iteration. Numerous concerns have been raised, mirroring my own, particularly regarding the use of "may" instead of the clearer term "shall" and the encroachment on New Hampshire's valued principles of local control by the state.

The proposed standards, developed by Fred Bramante and Commissioner Edelblut behind closed doors, lack crucial input from practicing educators in Competency Based Education (CBE). However, educators have provided valuable insights to enhance the draft during public comment, ensuring it addresses the diverse needs of students. Excluding

professionals from the field risks creating a framework based more on ideology than proven best practices. Given concerns about Bramante's past comments that he'd like to 'blow up public education' and Commissioner Edleblut's focus on funding private and online programs, the board should prioritize educators' perspectives rather than dismissing opposition, as witnessed in the defensive closing statements by Chairman Cline and Commissioner Edleblut at the last public hearing.

The increasing reliance on online courses as substitutes for in-class learning is concerning, especially considering the limitations highlighted during the COVID-19 era. Mary Wilke's classroom teaching methods, emphasizing critical thinking and collaboration through discovery learning, seemed to surprise some Board members, indicating a possible disconnect from the realities of classroom teaching and your perceptions that teachers have not moved past the "factory model". I assure you, it has. However, Ms. Wilke's example underscores the importance of direct teacher guidance in student learning. The shift from "shall" to "may" in the new 306 standards could lead schools to view online learning as a viable substitute for in-class instruction, despite the limitations highlighted during the pandemic. Also, given the many criticisms of online learning, it's misguided to assume that districts can rely solely on online platforms to enrich students' learning experiences.

As a taxpayer and former educator, I'm deeply concerned about the potential impact of approving the current draft standards on our children. In a competency-based classroom, we emphasize continuous improvement, and many have testified as to how you can enhance these standards. You as a board have the option to inform Commissioner Edleblut that these standards are not yet ready for implementation and remind him and each other of his stated goal that "the ED306 revisions are to raise the education bar for students. We have high aspirations for these children." Keep this in mind when reviewing the 306 standards and ask "Are you approving standards to "raise the bar" or are you watering them down to the point anything goes for students' education requirements?"

Thank you for taking the time to review my comments.

Kathleen Malsbenden
Newmarket, NH 03857

From: [Adams, Angela](#)
To: [Adam Osburn](#)
Subject: RE: ED 306 Written Testimony
Date: Tuesday, April 23, 2024 3:46:32 PM
Attachments: [Adam Osburn ED 306 Testimony, April 2, 2024.pdf](#)
[image001.png](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator

New Hampshire Department of Education

Office of the Commissioners

Phone: 603-271-3144

25 Hall Street, Concord NH 03301

Email: angela.m.adams@doe.nh.gov



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Department of Education

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From: Adam Osburn [REDACTED]
Sent: Tuesday, April 2, 2024 3:57 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: ED 306 Written Testimony

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Hi Angela, please include this with the written testimony for tomorrow's hearing on Hall St. for the State Board of Education. I do hope to be there and potentially be able to deliver it personally. Thanks you again for your help with this and have a great day,

Adam Osburn

April 2, 2024

Members of the New Hampshire State School Board of Education,

I have worked in New Hampshire public schools since 1995 both as a teacher and as an administrator. I have also been a proud parent during those years and watched as both of my children attended and flourished within two different school districts. I have witnessed, personally and professionally, the difference that high quality public schools can make in our young people and also in our larger communities. Therefore, I am greatly concerned with the potential erosion of our current educational rules (ED 306) and their replacement with less rigorous, more flexible and generally watered down rules.

In New Hampshire, we have enjoyed a high quality public education system. The proposed rule changes as drafted will open the door for communities to opt out of educational opportunities for our students. Class size, what is accepted as a credit, what areas have to be offered and what don't, the need for educator certification or lack thereof, for example, will negatively impact schools and their students.

I initially was drawn to public education because of the powerful positive contribution that an individual can have in the lives of young people and ultimately on society. I still believe that and am inspired by that ideal. Schools create community and enable a sense of belonging and inspiration among our students. Our schools can and do create places of belonging. We have witnessed the examples of horrific events in the news that illustrate what can occur when students **do not** feel this sense of belonging. Case in point, suicide is the third leading cause of death among teens. We know that the need to belong is a human essential and when people feel as though they do not belong or connect with others, truly terrible things can occur.

As a school principal, I look to hire teachers who will create positive connections with students. I want the Art teacher to create an environment within his or her classroom that causes students to want to be there and creates a safe place for them to explore their interests. I want the music teachers to foster an atmosphere of creative positivity where students go before and after school to participate in extracurricular opportunities. The connections that students make with teachers helps to create a safe and supportive climate and culture where students find belonging and acceptance. In turn, their interests and talents are supported and celebrated. Beyond the Unified Arts, even classroom teachers will find it more difficult to create essential personal connections with students if class sizes increase due to a lack of defined requirements. My concern is that the revised ED 306 rules will make it much easier for communities to eliminate these opportunities for students in the name of cost savings. This denies access for students who may need these programs the most. In an era where today's youth are facing an unprecedented mental health crisis, it is crucial that we respond with a commitment to maintaining the highest standards of learning and care. This encompasses academic excellence, social support, and empathy for our students.

The Hopeful Futures Campaign, a coalition of national organizations, is dedicated to ensuring that every student has access to effective and supportive school mental health care. The campaign's school mental health report cards highlight achievements and provide actionable steps to address the children's mental health crisis in every state. In 2015, New Hampshire ranked 38th in the nation for Youth Mental Health, but by 2022, we had risen to 6th place. This notable improvement is attributed, in part, to the strong partnerships between schools and

families that exist in our state. This data further demonstrates that our public schools, as currently designed, are not failing our students. Families rely heavily on the expertise, guidance, and compassion provided by our highly qualified educators and leaders.

Public schools are at the center of many of our communities across our state. Our reputation nationally for academic achievement is exceptional. Our support of social emotional well being among our students has improved greatly in the wake of many well publicized tragedies. Our teaching professionals have embraced Multi-Tiered Systems of Supports and Social Emotional Learning to support our students. We strive to create places of belonging within our schools where all students can see themselves and feel connected.

I would not want to see the opportunities and safeguards which we have worked to put in place disappear as a consequence of our revised ED 306 rules. As areas are not required under the rules and the language in the rules shifts from "shall" to "may," we will see communities cut the Arts, Music, and other areas as well. Students will not only miss out on academic opportunities but on the community and sense of belonging that accompanied them.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Adam Osburn', written in a cursive style.

Adam Osburn

From: [Adams, Angela](#)
To: [Kevin Powell](#)
Subject: RE: Testimony for ED 306 hearing today
Date: Tuesday, April 23, 2024 3:41:14 PM
Attachments: [image001.png](#)
[ED 306 Rules \(Letter to the NH State Board of Education\).pdf](#)

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12. Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,

Angela

Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners
Phone: 603-271-3144
25 Hall Street, Concord NH 03301
Email: angela.m.adams@doe.nh.gov



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From: Kevin Powell [REDACTED]
Sent: Wednesday, April 3, 2024 7:13 AM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: Testimony for ED 306 hearing today

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Hello!

Here is testimony I would request to be read at today's ED 306 hearing.

Thank you,
Kevin

Kevin Powell
Westmoreland, NH

ED 306 Rules
Meeting: April 3, 2024

Letter to the NH State Board of Education

Hello,

I am writing you today as a concerned parent and school board member of a district here in New Hampshire. I have had some opportunities to read through the lengthy Minimum Standard Rules to gain some understanding as to the proposed changes. I am concerned specifically to language being altered and/or removed to make certain standards optional (shall to may) or replacing instruction with such references as "opportunities". Some of the removal of certain language may remove protections from discrimination or bias or alters commitments to every student to receive a proper education regardless of their specific needs. Everyone who has spent time in the education system understands there cannot be a one-size-fits-all approach to teaching children the fundamentals and essential requirements they may need. The students in New Hampshire need tailored education with access to programs in order to give them the best chance to graduate and be ready to tackle the world ahead of them, whether it's joining the work force, the military or higher education. Control needs to stay with the local districts to keep up competencies, graduation requirements and assessments. This set of rules with changing language will have sweeping consequences for students and communities alike.

I would like to propose to keep the higher standards as they are and not change them to implement more of a factory system. Allow a group of New Hampshire's educators the opportunity to perhaps create a review board and have direct influence and involvement on all proposed changes.

Thank you for your time and attention to this letter,

Kevin Powell
Westmoreland, NH

Re:kjp

From: [REDACTED]
To: [Shea, Julie](#); [Adams, Angela](#)
Subject: New Futures' Comments on Proposed Ed 306 Revisions
Date: Tuesday, April 30, 2024 2:58:03 PM
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[Ed 306 Rules Comments.pdf](#)

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Good afternoon,

Attached please find New Futures' comments on the proposed Ed 306 revisions. Please feel free to reach out with any questions.

Best,
Emam



[REDACTED]
Children's Behavioral Health Policy Coordinator
New Futures | 1 [REDACTED]
[REDACTED]
[New-Futures.org](#) | [Make a Gift](#)

April 30, 2024

Commissioner of Education, Frank Edelblut
New Hampshire Department of Education
25 Hall Street
Concord, NH 03301

Re: New Futures' comments on Draft of the Ed 306 Minimum Standard Rules

Dear Commissioner Edelblut:

New Futures appreciates the opportunity to provide comments on the Draft of the Ed 306 Minimum Standard Rules.

New Futures is a nonpartisan, nonprofit organization that solves problems through policy change. New Futures is dedicated to supporting and strengthening a comprehensive and integrated System of Care for children and youth who experience behavioral health challenges in New Hampshire.

New Futures works to ensure that behavioral health needs of all students are supported in public schools, and that our public schools operate in a way that maximizes the opportunities for positive mental health outcomes for all students.

As such, New Futures has concerns with the language changes to Ed 306.06, Culture and Climate. All students benefit when schools recognize the individual and unique needs of each individual student. While on its face, the revised language of this rule recognizes the importance of diversity, the language inherently removes the recognition that certain groups are marginalized in our community. Removing this language fails to acknowledge the reality that ethnic, racial, and sexual/gender discrimination exists, making children who fall into these categories feel "othered".

Inequities disproportionately affect the well-being of populations protected against discrimination in New Hampshire.¹ Unfortunately, many of these disparities can contribute to New Hampshire families living in poverty, which is one of the greatest threats to healthy child development. Poverty increases the likelihood that a child will be exposed to factors that can impair brain development and lead to poor academic and health outcomes.² Further, failing to acknowledge the realities that many children across New Hampshire experience can contribute to feelings of worthlessness and low self-esteem.

¹ New Hampshire Fiscal Policy Institute, Greater Investments Key For Students Facing Inequities Across New Hampshire, August 25, 2021

² Hair, Nicole L., Jamie L. Hanson, Barbara L. Wolfe, and Seth D. Pollak. 2015. "Association of Child Poverty, Brain Development, and Academic Achievement." *JAMA Pediatrics* 169(9): 822–829.

However, simply giving children the space to learn and discuss inequities they are facing in an age-appropriate manner can teach them important concepts such as respect and acceptance. As children grow and learn more from discussions about diversity, they gain tools to help improve the system itself.

Further, the proposed Ed 306.06 removes language regarding the code of discipline being applied equitably. Again, it is critical to include equity as part of any discipline code, as disciplinary action is unequally taken against minority populations. Language prioritizing equity is critical in minimizing the unequal application of disciplinary actions.

Finally, the proposed Ed 306.06 changes the language of how school administration and staff address academic underperformance. Originally, the language includes provisions for equity and addresses the school community as a whole. The draft proposal language changes this to remove considerations for equity and address academic performance on an individual basis.

This change is concerning for the administration of programs such as the Multi-Tiered System of Support for Behavioral Health, or MTSS-B, which is a statutory component of the System of Care. Programs such as this involve the participation of the entire school, ensuring that all students feel supported and ready to learn. The proposed language that addresses only the individual students makes it difficult for programs like MTSS-B to improve the culture and climate of the school as a whole, which directly impacts a student's readiness to learn. Further, removal of the equity provision is concerning for the same reasons as expressed above.

For the reasons stated above, New Futures appreciates your consideration and inclusion of these concerns in any future proposed revisions of Ed 306.06.

Respectfully,



Emma Sevigny, Esq.
Children's Behavioral Health Policy Coordinator
New Futures, Inc.

From: [Adams, Angela](#)
To: [Mary Wilke](#)
Cc: [Shea, Julie](#)
Subject: RE: Written Testimony re: 306 Rules
Date: Monday, April 29, 2024 3:30:21 PM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12.

Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Mary Wilke [REDACTED]
Sent: Monday, April 29, 2024 3:28 PM
To: Shea, Julie <Julie.R.Shea@doe.nh.gov>; Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Written Testimony re: 306 Rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Hello Ms. Shea and Ms. Adams,

Attached is my written testimony regarding the proposed changes to the 306 rules. Please share them with the Commissioner and Board and place them in the official records of the hearings on this matter.

Thank you,
Mary Wilke
[REDACTED]

Testimony re: the Proposed Revisions to the 306 (Minimum Standards) Rules

by Mary Wilke, retired public school teacher, Concord, NH
Submitted to the State Board of Education on April 29, 2024

1. Many of the Proposed Rules exceed this Board's regulatory authority and therefore should be rejected.

Last spring when Commissioner Edelblut testified in the Conval case, the judge asked him about the content of a constitutionally adequate education. The Commissioner replied that the Department of Education administers what lawmakers approve, and enforces those requirements, but does not set policy.

Yet the changes proposed here via rule making are monumental and go well beyond "administering what lawmakers have approved." You're proposing to make systematic instruction optional and turn program elements that have traditionally been mandatory into discretionary options. If these rules were put into effect, schools would look very different from what the taxpayers who pay for them and the students who attend them have seen in the past. And they would look very different from what the legislature envisioned when it enacted RSA 193-E, setting forth the content of an adequate education.

RSA 193-E:2-a-1(a) reads: "[T]he specific criteria and **substantive educational program** that deliver the opportunity for an adequate education **shall be defined and identified as the school approval standards in the following learning areas...** [language arts, math etc.]" The proposed 306 rules have not complied with this mandate, because they have not "defined a substantive educational program." Instead, they've required a curriculum with lots of optional elements.

The rules actually delete the word "program" again and again. For example, Rule 306.26 currently requires that each school have a curriculum that includes an "instructional program", but the proposed rule (now at section 20) would take out the program requirement. In the proposed rules about specific content areas (starting at section 31), the word "curriculum" is frequently substituted for "program" and the elements of the "curriculum" are made optional. This is true for these specific standards: 306.31-306.35, 306.37-306.38, 306.40-306.45(d), and 306.46.

Surely when the legislature asked this Board to establish minimum standards for public school approval, it had in mind that public schools, at a minimum, would be required to do more than create curriculum.

And when RSA 193-E was adopted, it's doubtful legislators had in mind minimum standards that would allow for a smorgasbord of optional experiences that might or might not involve teachers, classrooms or school buildings. In fact, RSA 193-E:2-a-1(b), says, "Teachers shall use

academic and applied instruction to teach the learning areas under subparagraph (a) [language arts, etc.]” Substituting the phrase “learning opportunities” for the words “instruction”, “course”, “teaching” or “program” in various places in the proposal is a policy move inconsistent with this language. See, e.g. 306.08, 306.17, 306.18, 306.20, and various subsections of 306.21.

In short, it's clear that the drafters of these proposed revisions are imagining school in a very different way from what currently exists. They're looking to create a “system” in which public school students no longer spend most of the school day attending an actual school where teachers teach systematically planned lessons. That's a policy change that's beyond this Board's power. Change of this kind should - and under the law must - come from the legislature which, unlike this Board, has the power to legislate and is accountable to the people via elections.

2. Please retain the current class size maximums and do not use a student/teacher ratio unless as described below.

I would urge you to reconsider your proposed revision to Rule 306.14 and revert to including the specific numbers of students per class at different grade levels, because class size does significantly impact the ability of teachers to meet the individual needs of students. And, as others have testified, without class limit requirements it's very hard for districts to maintain reasonable class sizes in the face of pushback from property taxpayers who are feeling the squeeze caused by the State's downshifting of costs onto them, and who may not understand the impact of increased class size on the quality of education provided.

But if you do continue to use the phrase ‘educator/student ratio’, please define how to calculate that. Sometimes people calculate this ratio by dividing the number of educators in the whole school by the number of students in the school. As a teacher, if I am trying to teach 38 students in a classroom and no other adult is involved, that 1:38 ratio is way too small, regardless of how many other teachers may be in the school's employ. The relevant educator/student ratio should be the ratio of educators involved in teaching a specific set of students a specific class or subject at any given time, divided by the number of students in that set, or something along those lines.

3. The revisions to most of the rules from 306.31 to the end should be rejected because they do not mandate instruction of any kind and therefore really don't provide “minimum” standards.

I noted earlier that the legislature envisioned that the Department's rules would define the “substantive educational program.” RSA 193-E:2-a-1(a) and noted the many places where the word “program” was changed to “curriculum.” I urge you to change those words back to “program.”

The revisions in all of the following sections of the 306 rules - which address the content areas - not only change the word "program" to "curriculum", but also change the phrase "shall provide" to "may include": Sections 31,32, 34, 35, 37, 38, 40,41(a), 42, 43, 44, 45(d),and 46. And in each of the cited sections, the now optional opportunities seem like the essence of the subject. As just one example, what kind of an elementary English/Language Arts/Reading curriculum wouldn't include "systematic and continuous instruction which develops students' knowledge of language arts, including listening, speaking, reading, writing and viewing?" (rule 306.34(1))?"

I suspect that the teacher groups that met on their own to provide you with feedback about the content standards went through these sections one by one to identify whether some of the currently required elements could reasonably be optional, and I would defer to them rather than trying to do that myself. (I wish I could find their recommendations, but I haven't been able to locate them on your website.)

But by making all of these listed items optional, you're basically saying that the school doesn't have to do anything specific with respect to these subject areas in order to be an approved school, other than to have a curriculum. How can these be called "minimum standards" when the standards are optional?

4. The proposed changes to Section 41(c) (middle school science) should be rejected because they make optional activities and experiences that are essential to scientific inquiry.

(The following is testimony I provided in person on 4/11/24)

Because I taught middle school science, the following more detailed discussion zooms in on section 41(c), but, as noted above, I see similar problems with other content areas.

Middle schools are currently required to have a science program that includes lab experiences, field work, observations, investigations and other inquiry-based activities. These kinds of experiences go to the very heart of what science is, they're highly engaging for students and foster deep understanding. Yet the proposed rules would make them optional.

I'd like share a description of an inquiry based lesson from a unit on flower parts and their functions.

Eleven year olds love hands on activities, and when I distributed to each child a rhododendron blossom and a magnifying lens, you'd think they'd won the lottery. Right away, they started buzzing with observations and questions. Someone points out that one of the five petals on his blossom has spots. "Mine too!" others chime in, and they wonder why. A student notes that the stamen and pistil - the structures rising from the center of the blossom - all have a bend at the top and everyone checks theirs. "Wait a minute," says another. "Do yours all bend toward the spotted petal?" Yes, everyone said. Lots of excited questions: why? Is it connected with pollination?

A student peels open the swollen base of the pistil and calls out that it's full of little dots that look like the beginnings of seeds. Everyone else starts peeling theirs and a student wonders aloud how pollen would get from the top of the pistil to those seeds? More questions to add to our growing list. And on and on.

Over the following days, students eagerly researched the questions they'd generated. And for the rest of the year students - on their own initiative - reported on things they noticed about flowers they came across outside of school.

Sure you could show a student a video and, as a result, the student might be able to parrot back the names and functions of flower parts. But which activity would lead to a deeper understanding? Which students would experience the wonder of discovery that underlies the whole field of science?

Inquiry-based activities need equipment and materials, which can be expensive, and they need teachers to plan and provide the "systematic instruction" that the current rules insist on, but the proposed rules would drop. If the mandates become options, inevitably some financially strapped districts will choose to avoid the expense of hands-on, in person science lessons and opt for something cheaper. What a loss that would be for their students.

And we all know which students these would be. Not those at schools in well-heeled districts, but those in districts that find themselves, as a resident of Pembroke recently put it, choosing between pricing out the elderly or supporting schools.

Please retain the current rules so all students in all zip codes will have access to high quality, systematic, inquiry-based instruction in science.

Luke Felthun

Bedford, NH

Email: [REDACTED]

ED 306 Public Feedback Submission

Thank you for the opportunity to provide input to the Ed 306 process. Despite Competency Based Education being policy in New Hampshire for many years now, we do not have a system that actually does everything that was promised. One possible reason is that current and proposed Ed 306 requirements have been heavily influenced by the Aurora Institute which has a very different interpretation of Competency Based Education from what was understood by state legislators and has been communicated to the public.

1. Definition of Competency Based Education

Competency Based Education has traditionally implied a system where students are assessed on final outcomes without any dependence on the process followed. This has some appeal as our process oriented assessment practices tend to elevate workload over academic achievement.

While they do not use the term, secondary education in England is an example of a competency based system. A New Hampshire student can travel to England and for most subjects take the same assessments and get the same qualifications as a British student, just as if they had gone to a British school. While they take this approach primarily for academic reasons, it adds flexibility to what is otherwise a rigid system.

Here in the USA, the best example may be the international A level and GCSE assessments run by Cambridge Assessment, a department of the University of Cambridge. In some Southern states, particularly Florida, they are sometimes used as alternatives to Advanced Placement exams, however unlike AP and CLEP which are used for testing out of a course, the assessments are more comprehensive and provide a valid course grade that is recognized for admission to universities around the world.

This is very different from what the Aurora Institute and similar institutions define as competency based. In their version, emphasis is placed on assessment of general skills and attributes like communication, collaboration, cultural competency, character and critical thinking. More traditional academic skills are deemphasized and are defined as “standards” and not as “competencies”.

The Aurora institute has repeatedly put forward the Mastery Transcript as a suitable example of a competency based transcript. The sample transcript on the Mastery Transcript Consortium’s website: <https://mastery.org/what-we-do/mastery-transcript-and-mtc-learning-record>, provides a profile of a student with respect to competencies like compassion, cultural competence and critical thinking. Traditional academics do not feature on the main page of the transcript.

Competency based assessment as defined by the Aurora institute generally minimizes the use of tests and exams for assessment. Students work mainly on projects during which the teacher will assess them on multiple competencies. This does not lend itself to the type of competency based assessment originally envisioned for New Hampshire.

The mixing of the different interpretations of Competency Based Education can be seen in the following definitions in *Ed 306 Final Proposal DRAFT – March 2024* :

Ed 306.02 (e)

(d) “Competencies” means a grouping of related academic standards that a student will be able apply as a result of a specific set of learning opportunities;

This seems to be in line with what the state intended and most people would understand as competencies. This differs from the Aurora Institute which regards academic standards as being different from competencies. However the next item largely reproduces the Aurora Institute’s definition:

(e) “Competency-based” means an educational approach that includes the following tenets:

- (1) Competencies are explicitly stated and measured;**
- (2) Assessment practices are varied, authentic, transferable, and meaningful;**
- (3) Students advance to new learning opportunities upon proficiency;**
- (4) Students are offered timely interventions in response to their learning; and**
- (5) Attention to work study practices;**

There is no reason for all these items to be part of the definition. It obscures instead of clarifying what the defining characteristic of a competency based system is. Items 2 - 5 have the following issues:

(2) Assessment practices are varied, authentic, transferable, and meaningful;

This refers to assessments like projects, essays and presentations. Transferable skills refers to communication, collaboration and critical thinking. While students should encounter a wide range of assessments during their schooling, this would normally be influenced by the requirements of each subject. Traditionally, a course like “Design and Technology” or art would typically have a large number of these types of assessments. Science courses may have a modest percentage for practical work, math classes typically little or none. Putting these practices in the definition make these assessments central to every single course, effectively legislating the Aurora Institutes vision for assessment.

This approach creates the following problems:

- It is unlikely that these assessments would be able to produce a valid and reliable grade. Embedding a wide range of skills and dispositions in assessments for all subjects makes it difficult to determine what grades mean. Could a student with strong social and communication skills leverage these skills to get a good grade in subjects they are weak at?

What about a student who is good at math and science but maybe has weaker communication or social skills, would their math and science grades be compromised? The problem is that the intent of this proposed assessment strategy is to develop a profile of a student's personal characteristics for their transcript, not accurate academic assessment.

- These assessments are time consuming and increase the workload without necessarily improving the learning of the subject in question.
- The new proposals state that a student should be able to take the assessments without taking the course. The large number and time consuming nature of these assessments makes this largely impractical.

(3) Students advance to new learning opportunities upon proficiency;

What does this mean in practice, how does it work? Earning credit based on demonstration of proficiency might be better.

(4) Students are offered timely interventions in response to their learning; and

An important practice and reasonable to include in the ED 306, but should not be in the definition. It is not a defining characteristic of Competency Based Education as advocated by the state of NH.

(5) Attention to work study practices;

It is reasonable to have references to work study practices in the standards. It is not a defining characteristic of competency based education. The Aurora Institute makes it part of the definition because, as with other general competencies, it wants students to be continuously assessed on all attributes in all subjects.

2. Course Requirements

In course requirements, there have been a number of cases where "shall" has been switched to "may". This may not be an ideal approach but is nevertheless an improvement as many of the requirements increased student and teacher workload without adding meaningfully to learning. Consider the large number of items in **Ed 306.40 c** (High School Math), from Initial Proposal – February 15, 2024.

While students should encounter these activities during their education, overloading a subject like math with them would not be useful in helping students achieve their academic goals. These items should remain optional, requiring all of them in addition to the large number of assessments required by the Aurora Institute's version of Competency Based Education could increase the workload significantly for both students and teachers without improving academic outcomes. This could result in more students wanting to test out of these high workload courses.

3. Assessment

By requiring a certified teacher and local assessments, previous versions of Ed 306, seemed to legislate against the use of external assessments in determining student's grades. As successful competency based programs often benefit from the use of external assessments, ideally there should not be anything in the legislation which implicitly or explicitly prevents schools from using high quality external assessments, whether provided by the state or another organization.

From: [Richard Friedman](#)
To: [Shea, Julie](#)
Subject: Comment on the Minimum Standards for Public Schools Proposal
Date: Tuesday, April 30, 2024 2:35:07 PM

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Dear Ms. Shea,

I wished to comment on the draft Minimum Standards for Public Schools Proposal that has been released.

Not being a professional educator my single comment is focused on the following section relating to Staff and Staff Certifications.

Section Ed306.12 section (b) as currently proposed

...In carrying out the school counseling program, the local school board shall require that:

(1) The counseling load in each elementary school shall not exceed the equivalent of one full-time

licensed school counselor per 500 students enrolled;

(2) The counseling load in each middle school and each high school shall not exceed the equivalent

of one full-time licensed school counselor per 300 students enrolled;

(3) High schools with more than 4 school counselors shall provide a high school level licensed

director of school counseling to coordinate the implementation of the school counseling program

plan and policy, unless (4) below applies; and

(4) District level licensed directors of school counseling to coordinate K-12 implementation of the

school counseling program plan and policy shall be provided in districts where the number of

school counselors across all schools exceeds 10....

I would suggest because of the marked increase in mental health issues which has been documented in children and adolescents in the past several years the proposed ratios are too high and consideration should be given to reducing these recommended ratios so each licensed counselor has a better chance of identifying students in need of referral for mental health issues. I think it is unrealistic to think a counselor with a 1:500 or 1:300 ratio can have the time or ability to develop meaningful relationships with students so they can identify mental health issues or student would be open to discussing concerns important to them.

I will not propose any specific ratio except to recommend they be lowered.

Thank you for considering this recommendation.

Richard B Friedman, MD

[REDACTED]

Bedford, NH 033110

From: [Adams, Angela](#)
To: [Sarah Robinson](#); [Shea, Julie](#)
Subject: RE: Public Comment RE: ED 306 Administrative Rules
Date: Wednesday, May 1, 2024 10:22:43 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12.

Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Sarah Robinson <[REDACTED]>
Sent: Tuesday, April 30, 2024 5:32 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>; Shea, Julie <Julie.R.Shea@doe.nh.gov>
Subject: Public Comment RE: ED 306 Administrative Rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Angela and Julie,

Thank you for your assistance in making the attached letter available to the State Board of Education.

With Gratitude,
Sarah

Sarah Robinson
Education Justice Campaign Director
Granite State Progress

[REDACTED]
[REDACTED]
To book time to meet, please use my Calendly link:
[REDACTED]

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I acknowledge that I live and work on the land of the Pennacook Abenaki people of the Wampanoag Confederacy, who walked gently on the land many centuries before me. I am committed to learning about their history, culture, and stories, and to share them with my own community. If you would like to learn about whose land you currently occupy, please visit <http://native-land.ca>

This email is a private communication. If you are not the intended recipient, please disregard and do not divulge any information contained herein. Please notify the sender, and delete this email.

To the Members of the New Hampshire State Board of Education,

As the elected leaders of our local public schools, it is our duty to provide every student in our community a quality education, serving our students equitably and achieving high academic standards.

It is the NH State Board of Education's responsibility to help ensure our state has strong standards to begin with. The Education 306 Rules, commonly referred to as the minimum standards for public schools, establish the minimum standards for public schools to ensure that no matter where a student lives, they receive consistent access to quality education. The rules are a set of requirements that all public schools must comply with, setting the foundation for each and every public school across our state.

The 306 Rules draft the NH State Board of Education is currently considering lowers academic standards, lowers the value of teaching, removes local decision-making, changes "shall" to "may" in several areas to weaken academic standards and teacher certification requirements, and seeks to undermine our public school standards and change the future of public education – all to shirk the state's responsibility to fully fund adequate public schools.

As leaders, we know strong public schools are an investment we make in our community's future. We need the standards for our public schools to be robust and for the education offered to be honest and inclusive. The ED 306s are the foundation that all public schools stand upon. Without a strong foundation, inequities between districts and students grow significantly.

We are particularly concerned about:

- The removal of "district competencies" and "graduation competencies" from the document removes our ability and our community's ability to make decisions about what our graduates should know and do to be a productive citizen.
- Altering the role of a school from determining how courses and credits lead to a diploma, to schools simply "ensuring that" learning opportunities lead to a diploma.
- Changes from "shall" to "may" that broadly change the fundamental offerings of public education, and the state's responsibility in funding an adequate public education.

Our communities – from Croydon to Claremont and all across the state – are deeply invested in the outcomes of our local public schools. We request that the NH State Board of Education re-approve the current 306 Rules which our school districts already use and rely on, then revisit the editing process and make updates as necessary that incorporate the concerns above. This path allows our schools to continue to move forward, while providing more time for critical conversation around any substantial changes.

This is a crucial step forward in giving the public and school leaders confidence in the 306 Rules— and above all, ensuring high standards and opportunities for every student.

Sincerely,

Sarah Robinson, *School Board, Concord, NH*

Deborah Nelson, *School Board, Hanover, NH*

Giana Gelsey, *School Board, Durham, NH*

Janine Lesser, *School Board, Peterborough, NH*

Regan Lamphier, *School Board, Nashua, NH*

Alan Edelkind, *School Board, Dublin, NH*

Garrett Palm, *School Board, Hanover, NH*

Ed Spiker, *Selectman, Croydon, NH*

Nicole Bump, *School Board, Goffstown, NH*

Christine Heath, *School Board, Weare, NH*

Elizabeth Boucher, *School Board, Concord, NH*

Micaela Demeter, *School Board, Dover, NH*

Cara Meeker, *School Board, Concord, NH*

Jason Bonilla, *School Board, Manchester, NH*

Matthew Gerding, *Mayor, Summersworth, NH*

From: [Adams, Angela](#)
To: [Claudia Istel](#)
Subject: RE: Public comment on 306 Rules
Date: Wednesday, May 1, 2024 10:24:58 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12.

Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: Claudia Istel <[REDACTED]>
Sent: Tuesday, April 30, 2024 6:01 PM
To: Adams, Angela <Angela.Adams@doe.nh.gov>
Subject: Public comment on 306 Rules

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Claudia Istel
[REDACTED]

April 29, 2024

NH State Board of Education

Dear Madams and Sirs,

I am writing in opposition to the proposed revisions for the 306 Rules, the minimum standards for public education. With a career teaching math in public high schools in New Hampshire, being a parent of children educated in NH public schools, being a taxpayer, and a concerned citizen, I feel I can speak with knowledge and concern.

As I have testified before you on several occasions, public schools are foundational to our democracy and to equality in our society. Educated students become independent, productive, and active citizens in our communities and state. They share values of working for the common good through voting, giving time and energy to their families and communities, and supporting policies that are equitable for everyone, regardless of their race, gender, religion, sexual orientation, economic class,

or physical or mental differences that might cause some to consider them the "other," second class citizens.

You have the responsibility and ability to set the standards for a rigorous, inclusive, equitable education that prepares students to meet the challenges of living in the twenty-first century and prepares them to think critically and to learn how to learn to live in a world we cannot imagine today.

The proposed changes seek to undermine a strong public education – one that I was proud to be part of as a teacher, one that I was proud that our children received, one that served so many of the students in our rural communities well with special education, a broad selection of courses in English, math, social studies, science, world languages, arts, music, vocational and technical studies, advanced placement courses; one that I appreciated was among the best in the country. I find proposed changes disgraceful, inappropriate, unfortunate, and at odds with what we say is important in our state.

The best practices of education will be ignored by the proposed standards that replace requirements with suggestions (may vs. shall statements), eliminating limits on class size (when students repeatedly state they want to be recognized as individuals and learn best in smaller classes), and privatizing public education (by using taxpayers money to pay for private education through Educational Freedom Accounts that are not subject to transparency and accountability), unvetted curricula and uncertified "educators." That you persist in undermining what was a very good public education system in NH is acting against your charge to promote and protect public education in the Granite State.

Sincerely,

Claudia Istel

From: [Adams, Angela](#)
To: [David Trumble](#); [Shea, Julie](#)
Bcc: [Adams, Angela](#)
Subject: RE: Written testimony on 306 regulations
Date: Wednesday, May 1, 2024 9:30:00 AM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12.

Additional information regarding the Minimum Standards for Public Schools Approval can be found on our [website](#) and information regarding the rulemaking process can be found here <https://www.gencourt.state.nh.us/rules/manual/amendedmanualeffective5-1-16amended8-1-19.pdf>.

Thank you,
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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From: David Trumble [REDACTED]
Sent: Tuesday, April 30, 2024 11:14 PM
To: Shea, Julie <Julie.R.Shea@doe.nh.gov>; Adams, Angela <angela.adams@doe.nh.gov>
Subject: Written testimony on 306 regulations

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Dear Ms. Shea and Ms. Adams,

Please find attached my written testimony on the proposed 306 regulations.

Thank you very much for your help in putting together the public record.

Best wishes,

David Trumble

I offer this written testimony in opposition to the proposed regulations, as currently written, for three reasons.

1. The proposed regulations violate the Separation of Powers established in the NH Constitution.

(A) Agencies can only “fill in the details” of statutes when writing regulations. They cannot modify the law in any way. Anything besides filling in the details is “invalid” for Constitutional reasons.

This is according to the NH Supreme Court and is a long-standing rule of law in NH. The Court has held that regulations “may not add to, detract from, or in any way modify statutory law.” In addition, the Court said that “administrative rules which go beyond the filling in of details are invalid” and that an agency cannot “substitute its will for that of the legislature.” This is an extremely strict standard based on the principle of Separation of Powers as established by the NH Constitution. Source: NH Supreme Court, *Opinion of the Justices*, 121 NH 552 (1981).

(B) NH statutes require inputs as the basic minimum standard and require outputs-based accountability to work with these inputs. The NH Constitution requires that the State Legislature guarantee that every child in the public schools has the opportunity for an adequate education. In the leading cases on this topic, the *Claremont* and *Londonderry* cases, the Court held that the NH Constitution requires the Legislature to define an adequate education, fund it, and ensure accountability, so that the people of the State know we are living up to this responsibility. The Court in *Londonderry* said that the State had up to that point failed to identify the “substantive education program that delivers a Constitutionally adequate education.” In response, the Legislature embraced its duty, and acted in a bipartisan manner in 2007-2009 to amend RSA 193-E to lay out the details.

(1) Statutes. 193-E:2-a lays out the “substantial educational program” which every school must provide. It lists the mandatory subjects (or learning area) and defines the role of

“educators.” The next major section of the statute, 193-E:3-b, explains how the state would ensure “accountability.” The first words of this section are that by using an “input-based accountability system” schools can demonstrate they are providing the opportunity for an adequate education by using both inputs and performance-based accountability measures. Prior to the 2018 Amendments, a school could provide evidence of accountability by using either input or performance assessment. This changed in 2018, when the Legislature amended 193-E:3 in a bipartisan manner to require both inputs and outputs. The House Education Committee passed these changes by a vote of 17-2. The legislative history of these Amendments states that “a school must demonstrate that it is providing an adequate education by both the input and performance based systems, not just one,” and that “Proficiency in just ‘one’ system will no longer suffice for providing opportunity of an adequate education.” In plain English, using inputs alone does not guarantee results and there is no reliable performance assessment that can stand on its own. It is only through a combination of both input and output accountability that we can ensure that we are living up to the Constitutional duty to provide an adequate education.

(2) Court decision. In the recent *Conval* decision, the Superior Court confirmed the role of the inputs-based model as the basis for setting the minimum per-pupil expenditure required by the NH Constitution. The Court looked at all the essential inputs required for schools to provide an adequate education –salaries for teachers, paraprofessionals and other staff, materials and maintaining the facilities. The system of input-based accountability established in 193-E:b is both required by statute and protected by the NH Constitution.

(3) Current 306 Regulations. The current 306 regulations do not try to “legislate through regulations.” Instead, they operate within the Constitution; they “fill in the details” of the relevant educational statutes. As required by the education statutes, they guarantee both input and output accountability (assessment and testing).

The input-based mandates, when considered together, guarantee our collective understanding of what constitutes a school. Current regulations provide for teachers in classrooms with maximum class sizes, require local school boards to set instructional time for all subject matters, require differentiated learning for students based on their needs and interests, require certified teachers in all subjects including art, music, health, and physical education, and lay out specific educational instruction that schools must adopt for every area of study and enforce these requirements by the use of the word “shall.” These apply to every subject from Math, Science, English, Social Studies, Art, to World Language.

(C) The proposed rules violate current statutes by replacing the requirement of inputs plus outputs with outputs-based accountability only. The proposed regulations only require that schools provide “opportunities to facilitate learning” and rely solely on the standard that students are making progress toward proficiency in the subject areas. This represents a major change in policy from current NH statutes. Only the Legislature can make a change in policy of such magnitude.

The proposed regulations eliminate and unravel these input-based accountability measures.

(1) They change the requirement of a program of studies and to a policy based solely on demonstrating proficiency in 306.21 (e). This is a clear statement that the new regulations would eliminate the requirement of both inputs and outputs and only require outputs-based accountability.

(2) They eliminate the basis of instructional time in 306.20 (c), and in their pejorative language remove the use of “seat time” in 306.15 (b), a phrase not found in the current regulations. Under the proposed regulations, students would no longer be in their assigned grade with their classmates studying with differentiated learning, but rather might be on a computer taking online courses.

(3) They eliminate the basic input of a teacher in a classroom, with maximum class sizes in 306.14. Currently, class sizes are set at 25 for K-2 (striving for 20 students) and

30 for older students (striving for 25 students). Mr. Cline at the April 11th hearing defended this change because, in his judgement, someday people might not want classrooms any more. He offers to replace the requirement of the maximum numbers of students to teachers in a class, with facilitator to student ratios. It is clear the agenda is to remove the most basic input we have, which is classrooms with teachers.

(4) In section 306.31 and forward, they change every “shall” to “may” when it comes to specific educational instruction for every area of study. This clearly goes against the language of the *Claremont* and *Londonderry* cases, which are the basis of 193-E, requiring specific educational criteria and programs. Under the proposed regulations, towns and cities with limited funds would soon be unable to insist on a minimum level of inputs, and thus would not be able to put together workable school budgets, leading to the unraveling of public schools around the State.

(5) They eliminate the requirement for certified teachers for art, music, health, and physical education in 306.12 (a) (5), clearly reducing the minimum level of standards of inputs,

(6) Taken together, this set of regulations is a major change in educational policy, overturning State law. It replaces a statutorily required system of both inputs and performance accountability, with a vague performance standard. It replaces our understanding of what a school is with no clear replacement model of what a school would look like.

Read together, these proposed regulations do not fill in the details of the statutes, but instead try to legislate through regulation. Thus, they are Constitutionally “invalid.”

(D) Threat to Democracy.

The regulations are a clear statement to both the Legislature and the Judicial Branch, that the Department of Education sees itself as above the law. They see themselves as immune to the Constitutional principle of Separation Powers (agencies cannot make law when

writing regulations) and under no obligation to live up to the Constitutional mandate to ensure an adequate education to all children in the public schools as laid out in NH statutes. Educational changes of this magnitude are the domain of the Legislature. In 1981, the Legislature was rewriting the Administrative Procedures Act which governs regulations and administrative agencies. They asked the NH Supreme Court to provide their opinion. In its decision, called the *Opinion of the Justices*, the NH Supreme Court looked at the Constitutional questions that arise with agencies writing regulations and wrote these words. "The concept of separation of powers contained in virtually every American constitution was designed to protect the people from the tyranny of government which could result from the accumulation of unbridled power in any one branch of the government." This is not a small matter. Not only is the future of our public education at stake, but also the future of our democracy and system of government.

2. The proposed regulations are against the "public interest" by reducing the quality of education and increasing inequality between towns.

Schools that lack strong local tax bases are constantly faced with impossible choices in funding. These rules would permit these schools to eliminate important programs of studies, and to have large classes that would deny all students the opportunity to have a successful education.

These regulations would allow the wholesale substitution of online education for in-person education. While there is a place for rigorous online education, it is not a reasonable replacement for our current public schools.

In addition, over 95% of the 40-plus witnesses, mostly professionals in the field of public education, who testified at the State Board of Education hearings over the last 7 months said it would be a harmful policy from an educational standpoint.

3. The proposed regulations are against the “public interest” by reducing protections from discrimination in public schools.

(A) NH Statutes RSA 193:38 and 193:39 read together protect the rights of all students from discrimination, specifically mention students in 11 classes, and require all public schools to have policies in place to prevent and respond to such discrimination.

RSA 193:38 -- No person shall be excluded from participation in, denied the benefits of, or be subjected to discrimination in public schools because of their age, sex, gender identity, sexual orientation, race, color, marital status, familial status, disability, religion, or national origin.

RSA 193:39 – Each school district and chartered public school shall develop a policy that guides the development and implementation of a coordinated plan to prevent, assess the presence of, intervene in, and respond to incidents of discrimination on the basis of age, sex, gender identity, sexual orientation, race, color, marital status, familial status, disability, religion, national origin, or any other classes protected under RSA 354-A.

(B) Current 306.06 Culture and Climate regulations ensure fairness for all students.

They name the word “diversity”, they include specific classes of people, they acknowledge and address equity gaps, and spell out protections for discipline policies.

(C) The proposed regulations eliminate these important protections.

They remove the word “diversity” and remove the protections for protected classes of people. Specific language is always more powerful from a legal perspective. By comparison, general language is vague, does not require schools to adopt policies, and is unenforceable.

From: [Adams, Angela](#)
To: [Barbara Linder](#)
Subject: RE: email addresses on NHDOE website for State Board of Ed members
Date: Tuesday, April 30, 2024 4:35:41 PM

The New Hampshire Department of Education has received your written testimony regarding the Minimum Standards for Public School Approval (Ed 306.01-306.25 and/or Ed. 306.31-306.46). The written testimony will be provided to the State Board of Education and will be considered in preparing the report of public comments received on the rule pursuant to RSA 541-A:12.

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Thank you,

Angela M. Adams | Administrator

New Hampshire Department of Education
Office of the Commissioners

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From: Barbara Linder <barbara.linder7@gmail.com>
Sent: Tuesday, April 30, 2024 3:56 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: Re: email addresses on NHDOE website for State Board of Ed members

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Thank you for forwarding this message to James Fricchione and Philip Nazzaro.

Barbara Linder

----- Forwarded Message -----

Subject: NH DOE draft Rule 306 revision
Date: Tue, 30 Apr 2024 14:55:03 -0400
From: Barbara Linder [REDACTED]
To: Andrew.C.Cline@affiliate.doe.nh.gov
CC: James.M.Fricchione@affiliate.doe.nh.gov, Rajesh.M.Nair@affiliate.doe.nh.gov,
Philip.J.Nazzaro@affiliate.doe.nh.gov, Ann.L.Lane@affiliate.doe.nh.gov,
[REDACTED] ank.edelblut@doe.nh.gov

Barbara Linder

Concord, NH 03301

April 30, 2024

Drew Cline, Chair, State Board of Education
Members of the State Board of Education

To the Chair and members of the State Board of Education:

I wish to register my objections to the current NH DOE draft 306 Rule revision. Those rules must not be able to be used as ways to undermine and further starve public education.

I do not support the lowering of minimum standards. The state has been avoiding its financial obligation to support education for decades and needs no further justifications for doing so, especially at the expense of students from towns with fewer resources. As long as local property taxes are the major sources of funding, lower minimum requirements will lead to further cuts in programs and staff, and fewer opportunities for those students. Instead of supporting students from the whole state, there will be greater disparity. As a state, this lack of opportunity is truly what we cannot afford, and the State Board of Education is in the position to uphold standards.

I also object strongly to the idea of removing educator certification requirements. As a retired teacher, I know that there are already alternative routes to meet certification requirements, so there is no need to eliminate certification requirements. Removing them suggests that there is a lack of information or understanding of the need for preparation for teaching, or mistrust or disrespect for educators or what they do.

Should it be helpful to have a concrete example, I offer this one: you may remember learning to drive. It is likely that your parent(s) had been driving for at least 15-20 years before you got your learner's permit; that was no guarantee that it was easy for them to teach you to drive. Not every experienced driver is skilled or comfortable teaching a beginner to drive. Being a driver does not automatically make that person able to break the process into small steps and to explain them clearly; to build on the growing knowledge and experience in increments, with patience; to allow time and safe opportunities for practice; to pay attention to the learner's style and learning needs; and to be mindful of the safety of the new driver as well as the others on the road! As a former reading teacher, I can see the parallels with my work.

There is also a problem with several ways that moving to a statewide model of competency and assessment could be used to further undermine public education. Given that the current draft of the 306 rules was developed without much attempt to get input from educators, it becomes a concern that the competency model and assessment might also be developed without educators' contributions during the process.

Thank you for your consideration.

Barbara Linder

On 4/30/24 3:49 PM, Adams, Angela wrote:

If you could send the email to me. I will make sure they receive it.

Thank you,
Angela M. Adams | Administrator
New Hampshire Department of Education
Office of the Commissioners

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-----Original Message-----
From: Barbara Linder [REDACTED]
Sent: Tuesday, April 30, 2024 3:44 PM
To: Adams, Angela <angela.adams@doe.nh.gov>
Subject: email addresses on NHDOE website for State Board of Ed members

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Hello,

I attempted to send an email communication regarding the Rule 306 draft to all members of the State Board of Education, using the contact information on the department website. Two of the messages were returned to me, for James Friccione, and Philip Nazzaro. Do you have current email addresses for them, or are there new members of the board who are not listed on that page?

Thank you,

Barbara Linder