

Nevada System of Higher Education

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August 9, 2017

Steve Canavero, Superintendent of Public Instruction
Nevada Department of Education
700 E. Fifth Street
Carson City, NV 89701

Sent via email

RE: Comments on Proposed Amendments to NAC Chapter 389 relating to the passage of A.B. 7 (2017) and the Development of a College and Career Ready High School Diploma

Dear Dr. Canavero:

Thank you for the opportunity to provide written comments following my testimony at the July 31, 2017, workshop on the proposed amendments to NAC Chapter 389 relating to the passage of Assembly Bill 7 (Chapter 501, *Statutes of Nevada 2017*) and the draft language presented at the workshop for the regulations necessary to implement a the new college and career ready high school diploma. As I testified at the workshop, the Nevada System of Higher Education (NSHE) supports A.B. 7 and the efforts of the Nevada Department of Education (NDE) to support and guide high school students and their parents on pathways that prepare the students for college and career following high school graduation. I would like to briefly highlight some of the issues raised during the workshop for consideration as these draft regulations are further refined:

1. **Nevada's Advanced Diploma** – As you know, based on extensive data now available through the Statewide Longitudinal Data System (SLDS), NSHE considers the advanced diploma, as set forth under *Nevada Administrative Code* (NAC) 389.663, to be the “gold standard” for preparing Nevada high school students for the rigors of college-level coursework. We strongly encourage NDE and the State Board of Education to retain the advanced diploma as a proven pathway that prepares students for college, especially for those students who may not be able to meet the more extensive requirements for the proposed college and career ready diploma. For the Class of 2016, only 31.8 percent received an advanced diploma, and 68.2 percent received the standard diploma. Until there is sufficient data to support that at least this number – preferably more – will receive a college and career ready diploma instead of the standard diploma, the advanced diploma should remain an option for Nevada students.
2. **Use of ACT and SAT Assessment Scores** – Subsection 1 of the draft language requires meeting minimum test scores on the ACT, the National Career Readiness Certificate, or the SAT for the college-ready endorsement and the career-ready endorsement. With regard to this language:
 - a. The College Board (for SAT) and ACT constantly reevaluate the minimum scores they establish as college-ready benchmarks on their respective assessments. For example, the College Board recently redesigned its SAT Suite of Assessments, which includes the SAT. Following the administration of the redesigned SAT in March 2016, the College Board issued concordance tables for comparing the old SAT scores to the new SAT scores, and in response, the Nevada Board of Regents revised its benchmark scores for admissions and placement into college-level courses in September 2016.

To avoid having to revise the regulations in future to accommodate changing benchmarks, which can be a lengthy process, NDE might consider incorporating language similar to that of Subsection 2.e. of NAC 389.840 such as: adequate test scores based upon the benchmark test scores established by the Board of Regents of the University of Nevada that should enable a pupil to place into college-level coursework.

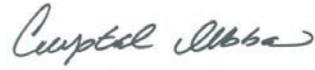
- b. Finally, and as expressed at the workshop by others testifying as well, the requirement to meet minimum ACT and SAT scores to qualify for the new college and career ready diploma may unintentionally disadvantage some minority students, who historically participate and meet benchmark scores at lower rates according to data from the College Board and ACT. Low-income students who are not able to afford the cost of an initial test or subsequent tests to try to raise their scores may also be unintentionally disadvantaged.
3. **Coursework Required for the College and Career Ready Diploma** – The required courses set forth under subsection 2 of the draft language appear to merge existing requirements for the standard diploma (NAC 389.664), the advanced diploma (NAC 389.663), and Standards for College Readiness (NAC 389.835). Following are a few considerations with regard to the proposed list of courses:
- a. **World Language Requirement** – While we know that students who earn an advanced diploma and take 2 years of a world language are less likely to be placed into remedial courses than their peers who earn the advanced diploma without the 2 years of a world language, based on data, the impact is marginal. It is unclear what the impact of such a requirement may be if students are deterred from pursuing the coursework required for the college and career ready diploma (which is similar to the advanced diploma) based on this world language requirement.
 - b. **Arts and Humanities, Junior Reserve Officer’s Training Corps (Level III or Level IV) or career and technical education** – The draft language adds an additional required unit in for these courses (increased from 1 to 2) for a college and career ready diploma. We have not been able to identify any data available through the SLDS indicating that such an increase supports college and career readiness. Could you please share any data that NDE is using in support of increasing this requirement or the rationale for the additional units?
4. **Definition of College Readiness** – The draft language revises the definition of college readiness established under NAC 389.830. As you know, this definition was adopted in 2010 after extensive work by a 16-member task force led by NSHE and NDE with the support of West Ed. Data now available through the SLDS allowed us to validate the work of this group reflected in NAC 389.830 through 389.845. I encourage NDE and the State Board of Education to retain this language, as the work of the task force, including the definition of “college readiness” and the standards for college readiness (NAC 389.835), remain valid.

Defining clear pathways for students and parents to follow for college and career readiness is a necessity for Nevada, and offering students multiple pathways for achieving this goal is optimal. Raising the bar with the new college and career ready diploma supports the efforts of the State to improve the economy by producing high school graduates prepared for college and career. However, the demanding requirements for earning this new diploma may unintentionally discourage high school students from pursuing anything other a standard diploma – if that is their only other option, and we know from the data that the current standard diploma requirements generally do not prepare students for the rigors of college-level courses. Students would need to start the path toward the new college and career ready diploma in 9th grade, and may decide along the way when they encounter any challenges that their goal is not achievable, and thus turn to the only other option – the standard diploma – likely leading to an increase in the number of students earning the standard diploma, which for the Class of 2016 was

68.2 percent of Nevada students. Retaining the current advanced diploma as another option – or pathway – in addition to the standard and the college and career ready diplomas is critically important, particularly until data is available to measure the impact of the college and career ready diploma.

NSHE and I remain ready to support and assist with efforts to prepare Nevada's students for college and career and look forward to working with you as we move forward.

Sincerely,

A handwritten signature in cursive script that reads "Crystal Abba".

Crystal Abba
Vice Chancellor
Nevada System of Higher Education

cc: Dr. Thom Reilly, Chancellor, Nevada System of Higher Education
Brett Barley, Deputy Superintendent for Student Achievement, Nevada Department of Education
Kristine Nelson, Director, Office of Career Readiness, Nevada Department of Education