

**State Board of Education
Public Comment Summary**

**Chapter 35. Standards for Accreditation of Elementary, Middle Level, Secondary, and
Career and Technology Schools**

Subchapter 27. Proficiency Based Promotion

210:35-27-1. Purpose and scope [AMENDED]

**210:35-27-2. Proficiency based promotion and course credit through examination
[AMENDED]**

**210:35-27-3. Appropriate notation for credit in core required curriculum area(s) completed
through examination [AMENDED]**

Summary of Public Comment	Agency Response
<p>Commenter urges clarification of the language in 210:35-27-2(d)(2)(C) pertaining to requirement that student progress must demonstrate proficiency in same curriculum sequence order. Commenter states "While sequence and linearity is important in some subjects, this rule may hinder true competency-based progression in subjects where linearity is not crucial to demonstrating proficiency. The Department should consider clarifying that this provision shall apply only in such cases in which a district provides evidence that linear progression is fundamental for scaffolding student learning, for specific clusters of competencies."</p>	<ul style="list-style-type: none"> • 70 O.S. § 11-103.6(G)(7) states "All units or sets of competencies required for graduation may be taken in any sequence recommended by the school district." • The agency has revised the language to remove the sequencing requirement while clarifying that decisions regarding curriculum sequencing are made at the district level.
<p>Commenter recommends the Department consider other key elements to holistically align policies to competency education, specifically taking other steps to align education policies to a competency-based system such as: Establishing high expectations for all children; development of the education workforce; establishing grading and transcript policies that provide students with multiple opportunities to demonstrate mastery; establishing competency-based graduation requirements; reporting graduation rates based on extended cohorts, and alignment with higher education; providing students with embedded and extended learning</p>	<ul style="list-style-type: none"> • This comment addresses broad policy goals which are outside of the scope of the proposed changes to these rules.

opportunities; and aligning formative, interim, and summative assessments to competencies and state standards.

