



January 21, 2020

Jan Barth, Ed. D.
Assistant State Superintendent
WVDE Division of Teaching and Learning
Capitol Building 6, Room 215
1900 Kanawha Blvd., East
Charleston, WV 25305

RE: Comments on Policy 2510
Homeschool Policy

Dr. Barth:

The following comments are offered on behalf of the Christian Home Educators of West Virginia (CHEWV) in regard to draft Policy 2510. Specifically, these comments are in relation to the “Homeschool Policy” directive to counties contained in Appendix A of Policy 2510.

In broad terms, CHEWV supports the concept of more local control for school systems and believes that such an approach will generally benefit WV students. However, there is a fundamental difference between the internal policy of a county operating its own school system and the county implementing policy to regulate a population *outside* of its school system. Such an approach provides an opportunity for counties to interpret the actual legal requirements contained in the state code according to their own, sometimes inaccurate, understanding or personal bias. This is particularly true for “exit policy”.

Counties should have the ability to set by policy, for example, what personnel will have primary responsibility for collecting and maintaining information submitted by homeschoolers, but it should have no authority to, for example, define its own requirements for what constitutes “satisfactory evidence of a high school diploma”. In short, state code gives counties no authority to set requirements for homeschoolers that are any more restrictive or numerous than the actual state code. This policy directive appears to provide opportunity for counties to do so.

We are unsure what public notice requirements, if any, exist for county school policy. At best, the proposed approach to policy would require a review of 55 different policies and potential communications with 55 different county officials. We believe this approach is overly burdensome to homeschool families - who are, after all, already quite busy educating their children. Homeschool families don’t have “staff” who can be assigned to such policy matters. If counties don’t provide adequate opportunity for public notice and input (one county recently sent out notification to homeschoolers that a policy on homeschooling would be voted on by the county board within a matter of a few days), problems will inevitably result.

We can see the benefit of having a written policy for homeschoolers wishing to (re)enter a county school system. However, the proposed state policy directive to counties is much too vague. It says, in essence, that a county can place a transferring homeschooled student in whatever grade it decides using whatever means of evaluation it decides. CHEWV

recommends that some threshold of fairness be established that could be used as a minimal guideline for transferring a homeschool student into the public school system.

We understand that subject tests developed from state CSOs may be used as a tool to determine whether high school graduation credit is awarded for a subject. However, homeschool students shouldn't be held to a higher standard than public school students are held, i.e. "mastery" shouldn't be the standard for a homeschool student to receive credit if public school students are awarded credit for graduation without fully mastering the standards.

CHEWV makes the following specific recommendations for Policy 2510:

1. The concept of "exiting policy" should be removed from Policy 2510. State code already exists that specifically addresses exiting the public school system to begin homeschooling.
2. The phrase "transferring the student into the county" is somewhat vague. The intent seems to be to address a homeschool student transferring into the public school system, but this is unclear and not in sync with the definition of "county" provided in the Policy 2510 Glossary. The current wording could cause confusion for a homeschool student moving into the county but desiring to continue homeschooling.
3. Policy 2510 should establish some recommended fairness guidelines for transferring a homeschool student into the public school system.
4. WVDE should consider developing a template policy for homeschool (re)entry as a guideline for counties.
5. Policy 2510 should establish adequate public notice requirements if notice isn't already required by law or other WVBE Policy.

Specific suggested wording changes for Policy 2510 are shown below.

CBEM shall develop a policy for the process of exiting students to homeschool and transferring a student from homeschool into the county school system. Students entering the county in grades K-8 may join their age appropriate cohort if the student's academic assessments have shown acceptable progress as defined in 18-8-1(c)(2)(C), or the county may utilize a combination of methods to determine appropriate placement for students who have not achieved such acceptable progress. For high school students the county may choose to use testing or other methods for placing students in the grade level deemed most appropriate or for issuance of credits. Acceptance of high school credits while homeschooling will be completely at the discretion of should be based on a fair and reasonable standard comparable to public school student achievement levels and will be set by the individual county. The CBEM shall give written notice of the proposed policy, and any future changes to the policy, to homeschoolers registered in their county at least 30 days prior to voting on such policy or changes to the policy.

Thank you for considering our perspective and for providing opportunity for input.

Sincerely,

CHEWV Board of Directors