

August 9, 2016

## UEN Comments Regarding Notice of Intended Emergency Rules to Implement New Individual Career and Academic Plan

Pursuant to the authority of Iowa Code section 256.7(5), Iowa Code section 17A.4(3), Iowa Code section 17A.5(2) and section 8 of House File 2392 (2016), the State Board of Education hereby proposes to adopt new Chapter 49, "Individual Career and Academic Plan," Iowa Administrative Code

**The Urban Education Network worked during the legislative session to help craft HF 2392 with balanced responsibility of local and state authority to net the best access and outcomes for students in preparing for success in a post high school career or college experience.** The UEN has notified the DE and heard favorable response regarding amending these rules accordingly, that the process for DE to generate a list of approved providers goes beyond the statute. The process will benefit local districts and students if the integrity of local and state balanced authority is maintained as we implement together. Rationale follows:

- 1) There is no state appropriation to pay for a career and decision-making system, which suggests the necessity for primary authority at the local level, since that's where the expenditure happens.
- 2) The State BOE is to approve standards for such systems, not approve a list of systems that are allowable.
- 3) The selection of a vendor/RFP process is for the state to select a vendor that district "may" use, but are not required to use. HF 2392 p. 4:
- 4) Districts may choose a system that meets the standards in the state BOE's rules, without having to choose from among a list of approved systems.
- 5) The UEN disapproves of any application or approval process by which the DE provides unnecessary oversight over local district decision-making and investment.
- 6) School districts have invested funds and time in adopting alternatives to I-HAPI over the last two school years. If the system they chose did not respond to DE's request for proposals, and doesn't get on the approved "list" under these proposed rules as written, the investment, both research into what system best aligns to local needs, investment of funding and staff training time, will have been wasted.
- 7) With the start of the fiscal year being July 1, 2016, it is too late for some districts to change systems, either because contracts have been signed or because training resources have already been dedicated.
- 8) The DE monitors compliance via accreditation, where the focus of the new tiered accreditation process should first be on outcomes, then on processes and systems (From HF 2392, p. 5)

4. The state board of education shall adopt rules setting forth standards for career information and decision-making systems. The rules adopted under this section shall establish an approval process for the approval of a vendor-provided career information and decision-making system which school districts may use in compliance with this section.

This flexibility to use a system and have the monitoring of implementation happen through the accreditation process was a priority for UEN districts as the legislation moved through the process. The original draft of legislation included the DE selecting and making a list of approved vendors, with districts applications for system use approved by DE. Since those requirements were specifically eliminated from the bill, it should be clear that the legislature heard the message and agreed to provide some local flexibility.

**Thank you:** The UEN appreciates the opportunity to share our concerns and looks forward to working with the department to implement Career and Technical Education opportunities for all Iowa students.

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