



August 27, 2020

Virginia Board of Education
BOE@doe.virginia.gov

RE: Standards of Quality for Public Schools in Virginia
Code of Virginia at §§ 22.1-253.13:1 through 22.1-253.13:10,

Dear Virginia Board of Education:

Virginia PTA appreciates the opportunity to comment on Virginia's Standards of Quality.

The Standards of Quality (SOQ) are intended to create a standard expectation across the commonwealth that prescribes the educational program and support at each school, the success of which should be able to be measured by families under the Standards of Accreditation and policies set forth under ESSA.

Unfortunately, over the past decade the General Assembly has not funded the Board's SOQ recommendations and has placed a formula driven cap on vital support staffing positions. These staffing changes do not align with prevailing practice and reinforce the economic and geographic inequities that the Standards of Quality are intended to address. As a result of the decline in state education direct aid, localities have invested on average \$4.2 billion above the required local effort for SOQ programs in 2017-2018. Many localities, however, lack a sufficient real estate property tax base to support and fund major K-12 operational and capital needs at the same levels as many affluent school divisions.

We can see these systemic funding inequities reflected in the choices school divisions are making as they select instructional models for the 2020-21 school year that balance poor ventilation systems, limited personal laptops and inadequate nursing and support staffing against the lack of broadband. In order to expand economic, geographic and social equity, Virginia PTA voices our strong and unwavering support for a re-calibration of the Standards of Quality that is based on the prevailing practice of school divisions and removal of the support staff cap.

We additionally express our specific support for the following items:

STAFFING RATIOS FOR SMALL SCHOOLS

Schools with less than 300 students operate primarily with part time staff and do not have an assistant principal. Although small in average daily membership, schools with less than 300 students often serve large geographic rural areas. In order to support the safety of the staff and students, maintain pandemic protocols, provide instructional support to teachers, support student and teacher technology use and provide timely positive behavior intervention the *Virginia PTA supports* the Standards of Quality prescribing at least one full time principal; full time librarian; full time technology teacher; full time bookkeeper or attendance secretary; and one full time custodian for every school regardless of size. Part

time staffing for any of these critical operational positions places the health and academic success of students at risk.

ASSISTANT PRINCIPALS

Research shows academic benefits of small learning environments as being equally as important as class size. Schools have grown larger at the same time as the academic and health needs of the student body have grown more complex. To maintain connection with students and staff, Virginia PTA supports 1 full time assistant principal per 400 students, regardless of school type (elementary, middle, high).

CHIEF EQUITY OFFICERS

Virginia PTA supports a revision to the Standards of Quality to include one full-time Chief Equity Officer per school division to oversee implementation of culturally responsive practices. This may include monitoring completion of cultural competence professional development, reviewing lesson plans and curriculum, assessing cultural necessities, decreasing discipline disproportionality and closing opportunity gaps.

WORLD LANGUAGES

Studying world languages increases global awareness, cultural understanding, academic achievement and employment opportunities. Appreciation and exposure to other cultures through world language instruction is an important aspect of celebrating the diversity of our students and staff. Virginia PTA supports prescribing the development of a K-16 world language instructional program that supports new language acquisition, retention of heritage languages and programs to recruit and retain qualified world language teachers.

UNIFIED MENTAL HEALTH TEAMS

Suicide is the second leading cause of death for ages 15-34 and half of all lifetime mental illnesses are identified by age 14. Most students do not receive the mental health services they need due to stigma and lack of access to services and of those who do get help, most do so only in school. The impact of the COVID-19 pandemic combined with the consequences of persistent and unaddressed racial inequity heighten the need to prescribe unified mental health teams at nationally recommended ratios: School Counselors 1:250, School Psychologists (1:500-700); School Social Workers (1:250); and School Nurses (1:school).

SCHOOL NURSES:

Virginia PTA supports using a multi-factor health assessment approach that includes not only need for acute care, but also social determinants of health to determine effective school nurse workloads for safe care of students. School Boards are required to employ licensed instructional personnel who are qualified in the relevant subject areas. This same standard of care should apply to school nurses to ensure that every school is staffed with a licensed registered nurse who is trained in epidemiology, infectious disease control, mental health and trauma informed care and who is able to support acute and chronic health care needs while also training school staff on best safety practices.

SCHOOL NUTRITION INTEGRATION & PROCUREMENT SPECIALIST

Agriculture is the largest industry in Virginia, plays an important role in our daily lives and is evolving due to technology advancements, yet is undervalued. Agriculture education should be integrated directly in the Standards of Learning curriculum (instead of through the nutrition department) to support rural workforce education and development, increase locally grown foods in school cafeterias and provide hands-on learning for all students. Virginia PTA supports prescribing a School Nutrition Integration and Procurement specialist for each region or school division to support local economic activity, increase the quantity of locally sourced foods served in school cafeterias and expand support for classroom instruction.

Thank you for the opportunity to comment on the Standards of Quality and for the rigorous care you exercise in understanding and prescribing recommendations that address the need for staffing and instructional programs that support racial, economic and geographic equity for our schools.

Sincerely,

Jenna Alexander

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Donna Colombo

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President, Virginia PTA