Veronica C. García, Ed.D. Superintendent of Schools

July 3, 2018

## VIA HAND-DELIVERY

Jamie Gonzales
Deputy Director of Policy, Innovation and Measurement
Public Education Department
300 Don Gaspar
Santa Fe, NM 87505

Re: Public Comment on Proposed Repeal and Replacement of NMAC 6.19.7

Green

Dear Ms. Gonzales,

The Santa Fe Public Schools ("District") is submitting the following public comment on the Public Education Department's proposed repeal and replacement of NMAC 6.19.7.

While in agreement that the options for demonstrating competency for high school graduation should be rigorous, the District has concerns about the proposed rule's de facto limitation of options for demonstrations of competency. First, the proposed rule reduces the assessment options by removing short-cycle diagnostic type assessments. Second, the proposed rule removes students' ability to submit portfolios in a Native American language or in Spanish. Third, the proposed rule presumes the availability of apprenticeships and internships when such programs have neither been established nor funded for implementation across the State. Finally, the proposed rule takes away the judgments of the Boards of Education and Superintendents who are the most knowledgeable about their regional needs and resources and the best-qualified to determine the appropriateness of alternative assessments, apprenticeships and other credentials for their students.

Sincerely,

Veronica C. García, Ed.D. Superintendent of Schools

cc: Board of Education

Linda Sink, Deputy Superintendent

6.19.7 Exhibit A

Santa Fe Public Schools