

**State Board of Education**  
**Public Comment Summary**  
**Proposed Permanent Rule Changes**  
**Chapter 15. Curriculum and Instruction**  
**Subchapter 1. General Provisions**  
**210:15-1-3. Procedures for review and Implementation of Academic Content and Process Standards [NEW]**  
**Subchapter 3. Priority Academic Student Skills [REVOKED]**

Summary of Public Comment	Agency Response
<p>Five (5) commenters expressed concern about revocation of the existing standards and replacing the standards with Common Core Standards</p>	<ul style="list-style-type: none"> <li>• 70 O.S. § 11-103.6 and 70 O.S. § 11-103.6a requires the Board to adopt curricular standards, but neither of those statutes require promulgation of academic standards and content methods by rule. Consequently, revocation of the rule will not affect a revocation of the academic method and process standards currently in effect. All academic method and process standards approved by the Board will remain in effect, although they will no longer be published in the Oklahoma Administrative Code.</li> <li>• Although Subchapter 3 is titled “Priority Academic Student Skills,” Subchapter 3 is not limited to PASS standards, but also includes standards adopted as a part of the Oklahoma C3 Standards</li> </ul>
<p>Three (3) commenters stated they did not understand the process whereby new curriculum standards will be adopted.</p>	<ul style="list-style-type: none"> <li>• The new process is clearly set forth in the new proposed rule at 210:15-1-3.</li> </ul>
<p>Six (6) commenters assert that the proposed rules are unnecessary, and request the Board continue to use the APA rulemaking process to fulfill the requirements of §§ 11-103.6 and 11-103.6a instead of the procedures created by the proposed Rule, because the APA process provides opportunities for significant public input and will yield reliable and appropriate results that fulfill legal requirements.</p>	<ul style="list-style-type: none"> <li>• The agency disagrees, as the new proposed rule set forth in 210:15-1-3 provides more opportunity for public input than the APA process.</li> <li>• Legal requirements are fulfilled under the process set forth in the proposed rule.</li> </ul>