

HOLMES MIDDLE SCHOOL

Regulation → Barrier → Requested Flexibility + Narrative Solution

WAIVER 1 — KRS 158.070(2)(a)

Instructional Hours Flexibility (A/B Blocks, Extended PBL, Onboarding)

REGULATION / REQUIREMENT

- 1,062 instructional hours must be delivered in approved ways.
- Traditional interpretation assumes standard daily scheduling.

BARRIER UNDER CURRENT STRUCTURE

- 45-minute periods break up labs, PBL cycles, and investigations.
- Inability to run multi-step OpenSciEd sequences without interruption.
- No structure for blended onboarding despite high mobility and proven transition-year learning gaps.

REQUESTED FLEXIBILITY & SOLUTION

- Allow reorganizing hours into 90-minute core blocks and daily PBL.
- Enable blended onboarding that supports SEL, routines, and readiness.
- Still fully meets/exceeds 1,062 hours while enabling high-quality deeper learning.

NARRATIVE SOLUTION

By allowing Holmes to reorganize instructional time into longer blocks, the school can finally deliver the uninterrupted, rigorous learning experiences required for deeper inquiry, OpenSciEd investigations, and project-based learning. This flexibility ensures that students—especially those entering mid-year—receive consistent onboarding and foundational routines, while the school remains fully compliant with Kentucky’s 1,062-hour requirement. The result is a more coherent, equitable, and effective learning environment.

WAIVER 2 — KRS 156.160(1)

Staffing Structure: Interdisciplinary Teams & Shared Specialists

REGULATION / REQUIREMENT

- Staffing structures assume traditional departments and single-content assignment.

BARRIER UNDER CURRENT STRUCTURE

- Departmental silos prevent interdisciplinary planning and PBL implementation.
- No formal authorization for roles like PBL Coach, Pathway Specialist, or Bilingual Support Lead.
- MTSS, multilingual supports, and PBL fidelity inconsistent without shared specialists.

REQUESTED FLEXIBILITY & SOLUTION

- Permission to shift from departments to interdisciplinary teams.
- Allow shared specialists who serve across teams to support PBL and pathways.
- Teachers remain within certification areas while gaining collaborative flexibility.
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NARRATIVE SOLUTION

This flexibility enables Holmes to adopt a modern, team-based staffing model aligned with real-world learning. Interdisciplinary teams give teachers the structures they need to plan and deliver integrated PBL, while shared specialists strengthen consistency in coaching, multilingual support, and intervention. The waiver maintains all certification boundaries while providing the organizational design necessary for high-quality implementation.

WAIVER 3 — KRS 161.020

Use of Adjunct Industry Professionals (Under Certified Supervision)

REGULATION / REQUIREMENT

- All instruction must be provided by certified educators.

BARRIER UNDER CURRENT STRUCTURE

- Many pathway fields (trades, fabrication, entrepreneurship, digital design) have **no EPSB certification pathway**.
- Without the waiver, industry experts cannot legally demonstrate or support technical learning.
- Limits authenticity and real-world application for students.

REQUESTED FLEXIBILITY & SOLUTION

- Allow vetted, trained adjunct professionals to support instruction under full certified teacher supervision.
- Certified teachers remain teachers of record and responsible for all grading, assessment, and compliance.
- Expands real-world learning connected to regional workforce needs.

NARRATIVE SOLUTION

This waiver ensures students gain access to authentic career-connected experiences while maintaining full instructional oversight by certified teachers. Industry experts will enrich learning through demonstrations and technical modeling that cannot be provided through traditional certification pathways. The waiver preserves safety, compliance, and instructional quality while expanding student opportunity.

WAIVER 4 — KRS 161.100

Interdisciplinary Co-Teaching & Integrated Blocks

REGULATION / REQUIREMENT

- Teachers may only teach content in their certification areas.

BARRIER UNDER CURRENT STRUCTURE

- Integrated PBL requires teachers to co-facilitate routines, discussions, and modeling across disciplines.
- Current rule interpreted narrowly restricts cross-content collaboration even when teachers stay within their certified content.
- Prevents robust interdisciplinary instruction.

REQUESTED FLEXIBILITY & SOLUTION

- Allow co-teaching of integrated routines without violating certification boundaries.
- Teachers continue teaching only certified content; waiver enables shared facilitation.
- Strengthens inquiry, real-world tasks, and deeper student understanding.

NARRATIVE SOLUTION

This flexibility allows teachers to collaborate meaningfully in interdisciplinary environments while ensuring they remain within their certification areas. Students benefit from a cohesive learning experience where content is connected and teachers model disciplinary thinking side-by-side. The waiver strengthens compliance clarity while enabling instructional innovation.

WAIVER 5 — 16 KAR 2:010

Certification Flexibility for Industry Expertise

REGULATION / REQUIREMENT

- Certification required only where EPSB provides an approved certification route.

BARRIER UNDER CURRENT STRUCTURE

- No certification exists for many Innovation Hub pathways.
- Without waiver, teachers cannot legally involve industry professionals even for demonstrations.
- Reduces authenticity, safety oversight options, and relevance of programming.

REQUESTED FLEXIBILITY & SOLUTION

- Allow supervised adjunct experts to support specialized technical work.
- Maintain certified teacher leadership and responsibility at all times.
- Introduce authentic, career-connected learning in absence of certification pathways.

NARRATIVE SOLUTION

This waiver preserves instructional integrity while enabling students to experience hands-on technical learning that certified teachers alone cannot provide. By allowing vetted professionals to support instruction under a teacher's supervision, Holmes can deliver relevant, career-aligned learning while maintaining full compliance and instructional oversight.

WAIVER 6 — 702 KAR 3:190

Staffing Ratio Flexibility for Multi-Adult PBL & Intervention Models

REGULATION / REQUIREMENT

- Staffing allocations assume traditional class sizes and lecture-based instruction.

BARRIER UNDER CURRENT STRUCTURE

- PBL and labs require more adults for safety oversight, small-group facilitation, and differentiation.
- Traditional ratios cannot support multilingual learners, IEP needs, and extended-block SEL/RTI cycles.
- Pathway rotations require flexible supervision.

REQUESTED FLEXIBILITY & SOLUTION

- Maintain all certified staffing while allowing additional adults to support instruction.
- Use multi-adult models that increase safety, access, and equity.
- Implementation requires flexible ratios but not reduced staffing.

NARRATIVE SOLUTION

This flexibility ensures that learning environments remain safe, equitable, and supportive as students engage in hands-on, collaborative work. Additional adults enhance supervision, provide targeted support, and strengthen instruction without reducing certified staffing. The waiver allows the Innovation Hub to meet the needs of diverse learners within a modern instructional model.

WAIVER 7 — SB 207

Certified Instruction Hours – Flexibility Within the 75% Rule

REGULATION / REQUIREMENT

- At least 75% of instruction must be delivered by certified teachers.

BARRIER UNDER CURRENT STRUCTURE

- Even brief, supervised adjunct-led demonstrations may trigger technical violations.
- Innovation pathways cannot run high-quality demonstrations without risking noncompliance.
- Students lose access to authentic learning experiences.

REQUESTED FLEXIBILITY & SOLUTION

- Maintain well above 75% certified instruction but allow supervised adjunct segments.
- Protects compliance while enabling career-connected experiences.
- Use scheduling audits and logs to ensure oversight.

NARRATIVE SOLUTION

This waiver preserves compliance while enabling students to benefit from brief, supervised demonstrations by skilled industry partners. Certified teachers remain present and in charge, and documented monitoring ensures that the school far exceeds the 75% certified requirement. The flexibility simply prevents technical violations within innovative instructional models.

WAIVER 8 — KRS 156.095(7)

Professional Development Flexibility Beyond 24 Hours

REGULATION / REQUIREMENT

- Teachers must complete 24 PD hours annually.

BARRIER UNDER CURRENT STRUCTURE

- 24 hours is insufficient for:
 - PBL implementation
 - OpenSciEd adoption
 - Interdisciplinary planning
 - IB-style inquiry structures
 - Leadership and coaching cycles
- Teachers need predictable, compensated learning time.

REQUESTED FLEXIBILITY & SOLUTION

- Allow extended, job-embedded PD aligned to Years 1–3 implementation.

- Provide stipends or defined leadership roles to compensate additional PD expectations.
- Improve classroom outcomes through sustained support.

NARRATIVE SOLUTION

This flexibility provides teachers with sustained professional learning needed for successful implementation of complex instructional models. Extending PD beyond the minimum allows for coherent training, ongoing coaching, and stronger instructional outcomes. Teachers are supported, compensated, and prepared to deliver high-quality deeper learning.

WAIVER 9 — KRS 156.265(2)

Differentiated Compensation for Innovation Roles

REGULATION / REQUIREMENT

- Salary schedules assume uniform roles without additional innovation-related responsibilities.

BARRIER UNDER CURRENT STRUCTURE

- Innovation roles (Pathway Leads, Fellows, Capstone mentors) require additional planning, coaching, community partnership work, and instructional leadership.
- The uniform schedule cannot compensate proportionally or competitively.
- Risks teacher burnout and turnover.

REQUESTED FLEXIBILITY & SOLUTION

- Provide stipends reflecting the expanded duties of innovation roles.

- Establish fair, transparent compensation structures.
- Improve retention and sustainability of the redesigned model.

NARRATIVE SOLUTION

Differentiated compensation ensures fairness and sustainability as teachers take on additional responsibilities essential to the Innovation Hub. By recognizing expanded duties through stipends, the school retains strong teachers, incentivizes leadership, and maintains high-quality implementation across all pathways.

WAIVER 10 — 16 KAR 4:020

Support Personnel Assignment Flexibility (PBL Coach, SEL Lead, Pathway Specialist)

REGULATION / REQUIREMENT

- Mandates specific support roles but does not account for innovation-aligned positions.

BARRIER UNDER CURRENT STRUCTURE

- Roles essential to the model (PBL Coach, SEL Lead, Pathway Specialist) are not recognized in the regulation.
- Traditional categories cannot support interdisciplinary instruction at scale.
- Inflexible assignments limit equitable support for students and teachers.

REQUESTED FLEXIBILITY & SOLUTION

- Maintain all required positions while adding flexible innovation-aligned roles.

- Deploy support staff where needed for pathways, SEL, PBL, and multilingual learning.
- Improve MTSS, onboarding, instructional quality, and student engagement.

NARRATIVE SOLUTION

This waiver enables Holmes to build a support model aligned with modern, interdisciplinary learning. While maintaining all required positions, the school can create roles that directly enhance PBL, SEL, multilingual support, and pathway implementation. The flexibility strengthens MTSS systems and ensures students receive the support necessary to succeed in a redesigned, hands-on learning environment.