

Portland Parents Coalition

Rob Saxton, Deputy Superintendent of Public Instruction
Directors Henry, Martinez, Summer, Colonna, Bowen, Veliz
State Board of Education
Oregon Department of Education
255 Capitol St. NE
Salem, OR 97310

December 9, 2014

Dear Deputy Superintendent Saxton and Directors Henry, Martinez,
Summer, Colonna, Bowen, Veliz,

We are disturbed to see the updated proposals on instructional hours submitted by the Oregon Department of Education (ODE) to the State Board of Education for approval. They weaken Oregon's high schools and hold little hope for families that school districts will be required by the state to adequately prepare students for graduation and success in college and career.

We had hopes that ODE would play a stronger leadership role than it has in the past when ODE issued its order in the Parents Coalition complaint against Portland Public Schools last March. Instead we see that rather than require all districts to meet already low minimum state standards for instructional and class hours, the proposed rules will perpetuate the multiple ways in which instructional hours can be further reduced by districts and remove all requirements regarding instructional hours per high school credit.

In addition, the instructional hours proposal requires districts to demonstrate that 90% of students are scheduled for the required minimum instructional hours by year 3. This proposal was initially presented as a way to correct the practice in some Oregon districts of scheduling high school students for less than 990. Part-time high school is a recurring problem in Portland Public Schools. *The proposal is unlikely to help Portland students, however, as it does not require that the 90% standard be met at each grade level and school.*

A district-wide average will not ensure that 90% of high school students are scheduled for 990 hours. High school students' schedules can easily be masked by the larger numbers of students in the nine lower grades who are more likely to be scheduled for full days, even without this standard. It is also possible for the reverse to occur. In a hypothetical district with 45,000 students evenly distributed over thirteen grades, K-12, only 40,500 students would need to be scheduled for the minimum hours in order for the district to meet the proposed 90% standard. A district could meet the 90% requirement without 90% of students at each grade level, or even each school, depending on its size, being scheduled for the minimum required hours. Sample scenarios follow.

SCENARIOS FOR REACHING 90%	# Students	% @ min req'd hrs
<i>Scenario 1: 95% of K-8 @ min req'd hrs</i>		
K-8 @ 95%	29596.15	95.00%
# Gr 9-12 req'd for district to meet 90%	10903.85	78.75%
<i>Scenario 2: 99% of K-8 @ min req'd hrs</i>		
Gr K-8 @ 99%	30842.31	99.00%
# Gr 9-12 req'd for district to meet 90%	9657.69	69.75%
<i>Scenario 3: 99% of 9-12 @ min req'd hrs</i>		
9-12 @ 99%	13707.69	99.00%
# K-8 req'd for district to meet 90%	26792.31	86.00%

We ask you to ensure that districts not undercut the MINIMUM instructional hours provided to students.

Past practice has demonstrated and school district representatives have testified that removing the minimum credit hours requirement will result in fewer class hours per credit for high school students. As Portland students learned, this means that course curricula will be cut and it undermines student efforts to better prepare for college and career.

In addition, the proposed changes allow districts to continue to reduce 990 by up to 30 hours for professional development and by up to 30 hours more for parent/teacher conferences, during which time students don't attend school and independent study is not required. Time can be counted as instructional for students, it seems, even if they are not participating in the instruction. For high school students, the required minimum is therefore effectively 930 hours, not 990 hours. It is extremely disappointing to see a revised proposal that actually sets lower standards for Oregon students.

We ask the State Board of Education to revise the proposed rules in the following ways:

1. Refuse to eliminate the already low 130-class hours per credit requirement for Oregon high schools.
2. Decline to allow districts to continue to reduce the already low instructional hours standards for students by 60 hours for parent/teacher conferences and professional development. We value both of these activities for the success of our students. Parent/teacher conferences and professional development are important and should be funded, as should instructional time for students.
3. Set a 90% scheduling standard for each school.

We strongly urge ODE and the State Board of Education to return to the drawing board and develop proposed changes that truly prioritize students and learning.

Regards,

Amy Kohnstamm, Brian Rupp, Caroline Fenn, Darcy Mundorff, John Richardson, Julia Brim-Edwards, Laura Smoyer, Linda Venti, Lisa Zuniga, Mike Rosen, Monique McLean, Tracy Barton, Valeurie Friedman

cc: Cindy Hunt, Emily Nazarov, Sarah Pope, Nancy Golden