



**Testimony to Oregon State Board of Education
Toya Fick – Executive Director, Stand for Children Oregon
December 10, 2014**

Re: First Reading, Proposed Rule Changes on

- **Definition of Instructional Time OAR 8-1022-0102(30);**
- **Required Instructional Time OAR 581-022-1620; and**
- **Credit Options OAR 581-022-1131**

On behalf of Stand for Children (Stand) members across Oregon, I write to provide feedback on the proposed rules on the definition of instructional time, required instructional time, and credit options.

Oregon has one of the shortest school years in the country, despite ranking 34th in the nation on per-pupil spending. We believe that time in school is a precious resource and needs to be carefully guarded. As currently written, these proposed rules would go a long way to ensuring more Oregon students receive instructional time that is in line or competitive with the rest of the country.

We applaud the leadership and staff at the Oregon Department of Education (ODE) for taking the steps necessary to bring to light the issues found in the current rules regarding instructional hours. They were thoughtful in engaging a variety of stakeholders in discussing these issues, including Stand for Children. What follows is a summary of the feedback from Stand members and leaders.

Comments on Proposed Changes to the Definition of Instructional Time OAR 8-1022-0102(30)

- **Definition of Instructional Time**

We would like to start by expressing our support for the new definition of instructional time. As proposed, the new definition makes it clear that instructional time is only “where direct interaction is maintained between a student and a licensed or registered teacher, a licensed practitioner, or an educational assistant who is assigned instruction-related activities and is working under the supervision of a licensed or registered teacher.” This change provides a critical safeguard on how to define instructional time.

We recommend that the State Board of Education (State Board) adopt the change to the definition of instructional time.

Comments on Proposed Changes to Required Instructional Time OAR 581-022-1620

- **Scheduling 90 Percent of Students**

Under the proposed rule, districts would be required to ensure that “90% of all students in the district must be scheduled to receive the minimum hours of instructional time” by the 2017-2018 school year. We agree with the premise of the change – provide a full schedule to more students.

basis – putting struggling families in a bind to find reliable, safe childcare and shortchanging our students for a full day of school.

When done effectively, staff development can be an integral factor in improving student achievement. Professional Learning Communities (PLCs) have been incorporated into many schools across the state. According to research by Oregon’s Quality Education Commission, effective PLCs can improve teacher effectiveness and increase student learning by providing teachers the space and time to “study the standards, create common assessments, compare performance, modify and adjust curriculum together, and share resources.” This time should be protected, but with minimal impact to the time spent with students.

We recommend requiring districts to employ the use of a PLC model as a substitute for the “staff development” language in current rule. We also recommend decreasing maximum amount of time for this type of staff development to 16 hours per school year. Lastly, we would like the State Board to discourage the continuation of weekly early releases for staff development.

- 30 Hour Limit on Parent-Teacher Conferences

Imagine you are a low-income, single parent with school-aged children. It is two weeks before Thanksgiving break. You work an hourly job at a retail store that does not give you the day after Thanksgiving off because it is the busiest shopping day of the year. You are struggling to find affordable, reliable day-care options so that you can go to work.

In addition, you get a notice from your kids’ school that there will be no school at all the next week for the following reasons:

- Monday is a teacher planning and grading day;
- Tuesday is the Veterans’ Day holiday; and
- Wednesday through Friday are parent-teacher conferences.

Under current rules, all of these days (save the federal holiday) count as instructional time for your child!

Unfortunately, this is a real-life scenario that many of our low-income members in East Multnomah County had to face this year.

Additionally, we’ve had members who *can* more easily afford childcare express their dismay with frequent no-school days. Again, in the survey of our members, one member said:

- “I think the half-day kindergarten and frequent days out of school is disruptive, to say the least. I feel that kids need more structure and having to bounce from school to home to daycare so frequently is difficult on them.” (Member, Springfield)

Again, we want to be clear: *parent-teacher conferences are extremely important and can have an unquestionable impact on student learning.* Research shows that the kids of involved parents achieve higher grades and test scores, have better attendance, complete more homework and demonstrate more positive attitudes and behavior.

At Stand, we encourage school staff to reach out to parents to be better partners with the parents of their students. In fact, members of our Medford chapter came together to stop their district

We believe the leadership at ODE and the members of the State Board have done a great job in the last round of waiver requests – using a standard of “is this good for students” as the lens for approval and making it clear to districts that repeat requests will not be approved. We applaud this approach and would like to see it codified in rules.

We recommend the State Board set standards and guidelines to determine which waivers to approve and stronger requirements regarding the frequency of waiver requests from districts.

We would also like to state for the record that we are deeply disappointed with the decision to remove the proposal for the “Tenths Model” for consideration.

Nearly 40 percent of Oregon students at 2-year college and 13 percent who enter a 4-year college require remediation. We believe the combination of a short school year, watered down instructional hours standards, and under-scheduling of high school students are largely to blame. We must address each of these issues to give our students the world-class K-12 education they need and deserve.

With the suggested changes mentioned above, the proposed rules would address two parts of the problem. We at Stand for Children commit to working through the legislative process to secure the funding necessary to address the third leg of the stool.

Thank you for your consideration,



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¹ If a school district chooses to offer less than 900 hours of instructional time for kindergarten students, the kindergarten program shall be considered a half-day program for purposes of ORS 327.006(1) and the school district shall ensure that every kindergarten student is scheduled to receive a minimum of 450 hours of instructional time per year.