

District Superintendent Comments on Proposed OAR Changes Required Instructional Time

"Our focus in Oregon should be on increasing instructional time for students—not reducing it. The most recent Quality Counts 2014 report has Oregon ranked 46 out of 50 for funding and near the bottom of the barrel for instructional time for students. We need to change this downward trajectory if we are serious about meeting our 40-40-20 goal. These proposed regulations will weaken our system by reducing requirements—not strengthen it. The 130 clock hour rule is not a rigorous expectation for time—and it is an expectation that can easily be met if the state increases the school year to 180 school days (or the equivalent for districts on a four day week). The state board should be considering increasing the length of the school year for Oregon students and COSA, ODE, and legislators should be working together to increase funding to meet that requirement. Kids need to be in school—and those who are behind need more school, not less. I am concerned that implementing these rules will have a similar effect to the proficiency derailment of last year (a decision that was made without adequate processing and feedback from those in the field)—and it will result in the unintended consequence of students getting less instructional time, not more. Please reconsider and get feedback from the field before adopting these rules."

"The implications of these proposals are far reaching. Starting with bussing. Adding 50 hours to that K-4 school day will cause the bus routes to have to go out earlier in the morning and later in the afternoon. For a small district like mine that has a single route for Elementary and Secondary, the length of the secondary day will also increase a great deal to account for the increase for elementary. As my secondary are currently within the proposed hours, I project that my teachers will have more time with students. I would think that that issue would come up in collective bargaining quickly. I would guess that districts that run a separate bus route for elementary and secondary will have similar issues as the time between routes will be compressed. Our parent / teacher conferences are usually done over a day and evening. If we are going to continue with this format, I will have to add two days to the calendar. I do not have any problem with replacing days lost to inclement weather. Obviously all of these proposals are going to impact our collective bargaining significantly."

"I agree with the concerns of changes in instructional hours. One other that I saw after reading through the entire document has to do with 4 day school weeks and the max hours a K-8 student can receive instruction per day. With a max of 6 hrs. a day for K-3 and requirement of 900 hours we would have to add 4-6 days to our calendar (depending on what they say about conference days). Without additional funding this would result in a reduction of 1.5 FTE to keep our district at a balanced budget. If they want to require more time they also must adjust the hours per day students can receive instruction."

"In my district you cannot add one minute of student contact time without bargaining it."

"Increasing the instructional hour requirement for grades 1-3 to 900 hours is a mute point for most schools so I have no problem with that, we currently have the same instructional hour delivery model for all of our elementary grades."

I do not agree with the "tightening-up" proposal as suggested in the notes. I believe parent engagement is a critical component of student success and believe that those hours should be counted toward the academic program, especially in cases where the student is involved in the parent teacher conference and is involved in the development of their own learning strategy. In addition the desire to eliminate any leeway with respect to conditions that are beyond a districts control, weather, flooding, etc. I think is a failure to face the reality of schools. What if for unforeseen reasons a district were to fall below the required hours but those students were able to show proficiency in the subject matter area in another way?

Finally, as a superintendent working with staff on school improvement at the elementary middle and high school I know that for every dollar I spend on professional development for my staff I will most likely (based on research) get a greater gain in student achievement than through any other expenditure of that resource. If we are not allowed to account for any of that time it may severely impact a districts ability and or desire to participate in this important part of the educational process. This is of particular significance in Oregon today as we continue the move toward the implementation of the common core and the switch to smarter balance...."

"Concerns:

- 1) The proposal does not adjust K-3 hrs up from 6 to 6.5 hrs per day so we would be out of compliance either by 18 hrs short of 900 or by 8 minutes per day over daily allotment, rather a dilemma.*
- 2) A bus trip for us averages about 4 hrs. Many of our games are either played in the daylight (spring) or have JV and Varsity, with JV typically starting about 4. Therefore, our athletes are out of class 20 to 30 hours per sport, a three sport athlete perhaps 75 hrs. We are not a large district, HS about 500 with a full sports schedule and fairly high participation; deleting "optional school programs" would impact about 300 of our HS students and 90% becomes a real challenge."*

"I vehemently oppose moving forward with any more unfunded mandates. Who believes that is best practice and reasonable? The number of candidates enrolling in teacher ed programs is decreasing as it has been doom and gloom about funding and responsibilities increasing on teachers with no additional compensation.

We already have 2 unfunded mandates on the books that are breaking all districts, full-day kinder and the PE mandate coming is really going to hamstring districts. For example, in Culver, we don't have enough gym space to make the requirements of the PE mandate."

"As a K-12 school on a 4 day schedule we already meet the hour requirements suggested for 1-3, but it would put us right up against the window.

We do use Parent Teacher Conference time as part of our measured instruction time, so losing that would cause us to have to add 3 more days to our schedule. We already have a very long day for our little ones as they are basically on the same schedule as our high school students, so lengthening the days doesn't seem a great option.

Finally, what in the world does it mean to require 90% of students reach the instructional time minimums? Do we get punished if we don't achieve that goal? Do the parents? Who is responsible and how will we be held accountable.

I ask you to discourage this OAR revision."

"90 hours, would make me 20 hrs short gr 2-3 and 40 hours short k-1. We do not count parent teacher conferences now. We would like the option of still using snow days as emergency. If we do not count professional development, it will go away. 90% seems high for high school seniors, but not if I get to do k-12 in the denominator."

"90% of all students? Or 90% of HS students? Or? Any changes in what counts as instructional hours? PD? Conferences? I'd welcome the extra 30 mins per day for 1-3, but it will be a negotiations issue. 130 - no problem."

"I am totally in favor of eliminating the 130 hour requirement for a credit. It flies in the face of credit for proficiency and works against our efforts to have dual credit classes.

I absolutely want our students to have as much time in school as our neighbors to the north. However, beyond making up every snow day, it is terrifying to think of those other additional changes without significant increases in revenue and the state stepping in and legally impacting our current collective bargaining agreements.

My district is fairly small. Just over 3,000 students and 388 total employees. Our licensed agreement is for 190 days and counts conference days, PLC time, teaching hours, and so forth. Our contract states the contract day is 8 hours. We currently spend 2 1/2 hours per week in PLC time (late start/early release) at a cost of approximately \$600,000 this year. We need effective teachers in the classroom and that takes professional development time and collaborative learning time. We are fully engaged in implementing our Effective Educator model. We just invested well over \$350,000 in a new English Language Arts and Reading curriculum k-12. We are implementing Response to Intervention (Instruction) in our elementary schools. We have a Priority elementary school and a Focus elementary school. We have huge "initiative fatigue", from these and so many other initiatives and requirements that are bombarding public education. Please send a message that this OAR as written is not what we need right now!!"

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"I believe this reflects precisely my greatest fear around our "leaning gap" campaign. The quick fix with many unintended consequences, is to just change the regulations around counting kids, counting hours, and requirements. The premise is that those slippery school folks are trying to sneak around and get away with something -rather than the reality that with continually squeezed funding schools are trying to find ways to maintain the most manageable teaching and learning situations for kids and teachers.

Now, on the other hand, I believe our rules have been a little loosey-goosey on some of this, thus almost anything goes. I get the fact that it appears that they are sort of floating trial balloons to see what might resonate with the state board. It would have been nicer if they floated those first with superintendents to ascertain, not necessarily whether we liked the specific proposal, but what the impact would be within our district if they made the change. I fear that something "simple" will resonate best with the board. That does not mean it is the right answer.

"It might be appropriate for us to do our own impact analysis in a somewhat formal analysis to see if we can tell if it is a greater issue in large districts or small districts, rural or urban, block schedules or 6 or 7 period day schedules, etc. Then the question might narrow down to fairness. Obviously, they are huge collective bargaining implications. (But in all honesty, sometimes regulation changes with enough lead time can be an effective way to get the contract changes that we all would like to have, but have no real leverage to advocate.)"

"A policy change like this would, in my opinion be counter-productive to what I believe they are trying to achieve, increased student performance? The issues as I see them...."

- The additional hours at K-3 would require decreasing recess or extending the school day. We attempted to decrease the recess time by 5 minutes at an elementary five years ago (we thought this was allowable in our Collective Bargaining Contract) only to receive a grievance and as a result we were unable to make this change. There would be huge issues with our Association so the only way this could be accomplished is by eliminating PD and Conferences.*
- Changing the allowed hours for PD and Conferences without additional funding would eliminate them. If additional funding were offered, perhaps we could hold PD and Conferences outside of the normal day and/or on vacations or weekends and offer additional stipends for the time. This is a major blow when considering the limited PD we can offer now and the tremendous need for improving instruction. Another idea if there were dollars attached is that we could hire substitutes and stagger the PD and conferences throughout the normal school days.*
- The 90% figure is interesting....if it is by total district numbers it wouldn't probably factor in....but if it were by grade or school that would be difficult at the high school level without funding for obvious reasons."*

"Unfortunately I don't have the time today to provide a thorough review. However, I do have significant concern about the cost associated with the increase in instructional time at the elementary as well as the requirement that 90% of all students meet the 990 requirement. Our margins are close enough at specific grade levels that the change in definition of instructional time would also cause an issue for us.

Philosophically, I agree with the changes....we need more instructional time. However, districts would need to have additional funding to support this expectation as well as enough lead time to work with our parent communities and unions to make the changes happen in a thoughtful manner."

"Thanks for keeping us up to date on this proposed instructional time issue. One thing that caught my eye was the online piece. I know that there is some controversy around the state regarding this delivery model. However, for districts like ours and Bend's, the proposed language may be very problematic. I have asked our online coordinator and Bend's to get together to provide a collective response."

"I have had a team look these over. All the recommendations would work. The inclement weather may create a contractual challenge that we would navigate with our association. Still, we could and do accommodate these below. We would very much appreciate the elimination of the 130 hour issue."