

Dear members of the Oregon State Board of Education:

The Board of Directors of the Oregon Association for Talented and Gifted would like to express its concern about the plan of the Oregon Department of Education to change the reporting schedule for the Division 22 Assurances from one year to three years.

The Division 22 Standards establish many basic education, health and safety standards for Oregon students. The current Assurances report consists of a checklist verifying compliance.

Although this change is not actually specified in the proposed amendments to OAR 581-022-1610, which merely state that districts must annually report on their compliance both to the community and to the state, the Department has announced plans to change the reporting schedule. It will require districts to submit the entire checklist to communities annually, but only once every three years to the state. Interim reports will address just a few standards. We oppose the proposed policy change and ask the Board to resolve to support the current procedure which requires annual submissions of the full checklist.

We understand that the Department believes that more detailed annual reports on a subset of Standards would provide more in-depth information. However nothing prevents the Department from requesting both the full set of assurances and greater detail on a specified subset: in fact we were pleased that the Department did exactly that this year.

If every district submits a full set of assurances to communities every year we do not see why it is burdensome to submit a copy of these *already prepared* forms electronically to the State Department of Education. We do not feel community notification alone is effective.

Moreover, if the proposed amendments permit submission of only a part of the assurances to the state every year, they equally would permit submission of a partial report to the community every year. We are not certain that the proposed amendments permit partial submission in either case. Even if they do, we do not support limiting compliance reports to just two or three standards either at a local or at a state level. Completing the entire checklist every year should be a welcome reminder to districts to make sure that none of these important standards has been overlooked.

In the past, we have been told that Oregon relies primarily on complaints from individuals to ensure compliance with the Division 22 standards. However, many standards cover items that are invisible to members of the community. The complaint procedure itself is one of the Division 22 standards, so the planned change also reduces the ability of the Department to monitor district compliance with the rules for filing a complaint.

We are very encouraged that the Department is considering ways to be more proactive in monitoring compliance. However, we do not feel that this proposed policy change either reduces a real burden on districts or does a better job of ensuring full compliance with state standards. Indeed, requiring full reports to the Department only every third year implies that the Department considers consistent compliance to be unimportant.

We believe that every Oregon student deserves to attend a school that meets state standards every year and that the Department should retain its current process for ensuring that this is happening

Thank you very much,

Sincerely yours,

Margaret DeLacy
Government Relations Committee
Oregon Association for Talented and Gifted

About the Oregon Association for Talented and Gifted:

OATAG is a non-profit, non-discriminatory statewide membership organization that advocates for the needs of talented and gifted children; serves as a resource for families, educators, and communities; and provides direction for excellence in education.

Background:

The Division 22 Standards are a set of Oregon Administrative Rules that fall under OAR 581-022 . They establish a series of standards for the operation of Oregon schools.

http://arcweb.sos.state.or.us/pages/rules/oars_500/oar_581/581_022.html

The current OARs also require that every Oregon District complete a form assuring the Department of Education that it is in compliance with these standards. This form is at <http://www.ode.state.or.us/superintendent/priorities/2013-2014-assurance-form-fillable.pdf>