

# 2020-21 Oregon Assessment and Accountability Strategic Waiver Draft Letter



January, 2021

The Honorable Frank T. Brogan  
Assistant Secretary for Elementary and Secondary Education  
Office of Elementary and Secondary Education  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202

Dear Assistant Secretary Brogan,

I am writing to request a strategic waiver for the State of Oregon, pursuant to section 8401(b) of the Elementary and Secondary Education Act of 1965 (ESEA), as amended, of the requirements provided below.

## Overview

The foundational conditions for summative assessment cannot be met in 2020-21 and this undermines the value and trustworthiness of summative assessment results. In addition, full statewide implementation of the general and alternate summative assessments in the spring of 2020-21 would hinder our ability to provide assessments that have individual consequences for students.

As a result, for 2020-21 we plan to:

- prioritize local education agency test administration resources and in-person testing capacity for English language proficiency assessment and IDEA individual diagnostic evaluation and re-evaluation requirements;
- develop and implement a pilot student survey that collects information regarding access to educational resources, opportunity to learn, and self-efficacy/beliefs to help inform instructional and support practices and contextualize assessment data;
- suspend administration of the statewide annual summative assessment in English Language Arts, Mathematics, and Science; and
- prioritize supporting districts to implement English Language Arts, Mathematics, and Science interim assessments to support fulfilling the state requirement of annual reporting to parents about student achievement.

## Background

### *Commitment to Equity*

Oregon Department of Education’s commitment to equity, student learning, and student well-being remains unchanged. As such, a statewide balanced assessment system is an essential part of a comprehensive approach to teaching and learning and to direct supports where they are most needed. Oregon communities, families, and educators are faced with learning environments that have gone through tremendous upheavals over the past eight months. The demands upon our educators, students, and families have been unrelenting. In this extraordinary landscape, we must adjust how we operationalize our commitment to equity by focusing on differences in student access to the resources that are needed to provide an adequate opportunity to learn, and to strengthen self-efficacy/beliefs indicators. In this strategic waiver request, the Oregon Department of Education (ODE) outlines a redoubled commitment to equity and supporting student academic achievement, specifically detailing how we plan to do so more appropriately and effectively in an atypical environment.

### *Unprecedented Challenges in 2020-2021*

Our students and staff are experiencing a pandemic and the impacts of an extreme fire season. Oregon COVID-19 health [metric trends](#) indicate that the pandemic is worsening, and may be compounded by the winter flu season. The impact of the pandemic is [differentially impacting](#) Oregon’s Tribal Nations and Native Hawaiian/Pacific Islander, as well as our Black and Latinx, communities. Furthermore, many families and communities suffered catastrophic losses related to the wildfires that swept through Oregon in summer and early fall. Currently, only 1.4% of our students are receiving instruction through traditional on-site instructional models (as of October 31, 2020). Our schools and districts are struggling to meet the basic needs of their students. Every segment of our student demographic has experienced the impact of these challenges, but they weigh especially heavily on the student groups our system has historically marginalized.

### *Summative Assessment Conditions and Uses*

Statewide annual summative assessment is highly effective for education systems accountability as long as foundational conditions are met. The summative assessments provide systems-level academic information that helps inform equitable distribution of educational resources. Trustworthy summative assessment data can also be used to help increase student learning over time. However, the valid interpretation and use of summative assessments depends upon a number of conditions, including:

#### *Conditions that Ensure Fairness in Student Test-Taking Experience*

- quiet, supportive, distraction-free assessment administration environments
- appropriate implementation of accessibility supports

- consistent student opportunity to learn the tested content

### *Conditions that Ensure Appropriate Data Use and Reporting*

- standardized test administration practices
- sufficient student group participation rates
- there is little to no missing data; where gaps exist they do not reflect systemic factors (e.g. access to resources)
- secure assessment conditions (to protect secure item pools)

Without uniform testing conditions and adequate participation, summative assessment results would misrepresent achievement within Oregon and would undermine confidence in the statewide assessment and accountability system. In 2020-21, the foundational conditions for summative assessment cannot be met, which means summative test results would not be reliable, comparable, generalizable, or valid for their intended purposes.

Oregon’s statewide summative assessments can be powerful tools in helping to identify schools and student groups who need additional resources and supports, as well as *helping* to improve educational achievement, consistent with the uses established at ESSA Sec. 1111(b)(10)<sup>1</sup>. Improving educational achievement requires a comprehensive assessment approach. Research demonstrates that formative assessment practices provide one of the strongest (Hattie, 2009) and most cost-effective (Yeh, 2010) levers for improving learning outcomes. The evidence of learning generated through formative assessment is informed periodically by results from interim assessment systems and annually by statewide summative assessment results. In an effective comprehensive assessment system, evidence from each successive level confirms and validates the evidence obtained at the preceding level. Consequently, discrepant results signal a possible need to reexamine standards alignment and quality.

## **Planning for Assessment in 2020-21**

### *Threats to Valid Interpretations and Uses of Summative Assessment Data*

Our concerns about summative assessment were informed by consultation with our national Technical Advisory Committee (TAC). In our meeting of October 29, 2020, the TAC was clear in urging ODE to suspend status-quo summative assessment. TAC members presented the following concerns to support their recommendation:

- increased anxiety for parents, students, and staff
- socioeconomic and regional differences in access to robust, reliable internet service

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<sup>1</sup> *USE OF ACADEMIC ASSESSMENT RESULTS TO IMPROVE STUDENT ACADEMIC ACHIEVEMENT- Each State plan shall describe how the State educational agency will ensure that the results of the State assessments described in paragraph (3)—(A) will be promptly provided to local educational agencies, schools, and teachers in a manner that is clear and easy to understand, but not later than before the beginning of the next school year; and (B) be used by those local educational agencies, schools, and teachers to improve the educational achievement of individual students.*

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- availability of technology to support and extend distance learning
- differences in resources available to support learning and assessment at home
- economic impacts of the pandemic on caregivers
- trauma related to the pandemic, systemic racism, the 2020 fire season, and related mental health concerns
- potential language barriers to test administration and support
- non-random missing data
- potential to confound with mode effects (remote administration versus on-site)
- potential for inappropriate uses of the data generated (e.g., student retention, teacher evaluation)
- reduced ability of the system to promote equity, due to a lack of reliable summary reports
- threats to validity related to remote administration

Given these and other threats to validity, summative assessment cannot meet its intended aims this spring. We cannot make trustworthy academic achievement comparisons between schools and districts sufficient for identification of comprehensive and targeted supports. Nor can we provide reliable and generalizable student group reporting. We also cannot look to summative assessment for instructionally actionable information. Consistent with the recommendation of our TAC, we have determined that Oregon’s interim assessment system is better suited to that purpose and is available to all districts statewide.

Pursuant to ESSA Sec. 1111(c)(8), which states, “*the State educational agency will inform the Secretary and the public of how Federal laws, if at all, hinder the ability of States to hold local educational agencies and schools accountable for student academic achievement,*” ODE would be hindered in our ability to hold districts and schools accountable for student academic achievement if summative assessments are administered outside of the foundational conditions elaborated above. The results from such an administration would not be trustworthy and this would undermine our ability to use assessment results for accountability purposes because public confidence in the assessment system would be undermined. Stated plainly, summative assessments are designed for a singular purpose - public education systems accountability. Thus, if school and district accountability is not defensible in 2020-21, summative assessments would also not be defensible.

Requiring summative assessments in 2020-21 risks stressing our educational systems and provoking public backlash that would undermine Oregon’s ability to implement summative assessments in the future. ODE has worked diligently to increase public trust in our statewide assessment system, by explaining how proper use of data helps ODE send resources where they are needed most. ODE is also still addressing the concerns of the parent opt-out movement. A decision to administer summative assessments that yield no academic benefit and place additional stress on our system could damage assessment in Oregon for years to come. In addition, incomplete and unreliable information could lead to damaging, inappropriate

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instructional decisions in 2021 and beyond. District assessment practices already provide assessment data that can be used for informational or low-stakes purposes.

### *Remote Administration Concerns*

Implementing remote administration of a secure statewide summative assessment poses significant technical and adaptive changes, such as internet connectivity and technology glitches, item security threats, student accessibility--particularly for students with significant cognitive disabilities--and system capacity limitations.

While test vendors have made secure remote administration tools available for summative assessments, the current technology limitations, family impacts, training protocols, and requirements for remote administration do not allow for its successful use this spring. Roughly 20-39% of Oregon's students, depending upon the district, do not have sufficient internet access to support remote administration ([ODE Survey](#), April 2020).

The Oregon Technical Advisory Committee (TAC) expressed serious reservations about remote summative testing. Concerns included uneven opportunity to learn, uncertainty about access and support, privacy concerns, and lack of test security. The TAC emphasized that any results from a remote administration are not comparable to previous administrations of the state summative assessment and cannot be interpreted and used as in prior years. The TAC identified high-stakes accountability as indefensible.

### *Assessment Resource Prioritization*

The global health crisis and recent wildfires have limited Oregon's resources for administering in-person, on-site, secure test administration in spring 2021. Oregon's schools that are implementing Comprehensive Distance Learning instructional models (remote instruction in asynchronous/synchronous formats) have substantial restrictions that apply to on-site services, including assessment (see Limited In-Person Instruction [guidance](#)).

Both our yearly English language proficiency assessment (ELPA) and the individual evaluations and reevaluations required within the Individuals with Disabilities Education Act (IDEA) have significant student-level consequences. The administration of the yearly ELPA constitutes a student's sole opportunity to exit English learner status in 2020-21, which impacts course taking and service provision. Likewise, evaluations required within IDEA provide educators with essential information to help make appropriate related service and instructional support decisions for students experiencing disabilities. Our waiver request prioritizes limited on-site resources, to help our districts meet the assessment needs of our students who are experiencing disabilities or who are emergent bilinguals.

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## *Protecting Parent Access to Achievement and Growth Data*

Regardless of summative test administration, Oregon policy ([OAR 581-022-2305](#)) requires that parents be notified annually about student performance and progress in the same content areas and grade levels assessed on our state summative assessments. Compliance is monitored, and district superintendents provide assurances that the expectation is met annually. This rule ensures that parents remain informed as to their child's academic performance and progress.

All Oregon school districts have access to a robust interim assessment system, which is aligned to our content standards. The interim assessment system can be successfully employed during distance learning and can be used as a resource to support adherence to this requirement, in coordination with local measures. For instance, evidence from the interim assessment system could be combined with evidence of learning collected by teachers within the course. Periodic in-the-moment evidence collected while learning is underway is, in fact, better situated to meet the diagnostic needs of students required in [ESSA Sec. 1111\(b\)\(2\)\(B\)\(xii\)](#).

## *Assessment System Redesign to Support Academic Achievement*

### **Interim and Instructional Resources**

ODE has provided districts with instructional and professional learning resources to implement balanced approaches to assessment. ODE is focused on supporting effective [formative assessment practices](#) and appropriate use of our new [statewide interim assessment system and Tools for Teachers](#), developed by the Smarter Balanced Assessment Consortium. As part of our waiver request, ODE will review implementation and use of its interim system in 2020-21 and beyond. The system was first made available for purchase by districts in 2018-19 and use has continued to grow. Table 1 provides data about local education agency (LEA) use of the interim assessment system from 2018-19 to the present. For reference, Oregon has 198 districts. The table does not convey use of the Tools for Teachers resources, which are instructional supports and materials.

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Table 1 : Oregon’s Interim Assessment Use

Year	Number of LEAs Using the System	ELA IAB Count	Math IAB Count	ELA ICA** Count	Math ICA** Count	ELA Focused IAB Count	Math Focused IAB Count
2018-19	8	4867	5955	743	1110	2991	3676
2019-20	22	6622	5123	3228	3576	4651	8693
2020-21*	6	448	828	0	0	0	240

Key: IAB = Interim Assessment Block; ICA = Interim Comprehensive Assessment

\* As of 11-20-2020. ODE advised districts to use our interim assessment system to address only content that has recently been taught; we expect these numbers to rise substantially through 2020-21

\*\*ICAs are not available in our system until January 5, 2021

ODE can best support students by focusing our fiscal and human resources on developing high-quality assessment systems, pursuant to [December 7, 2016 Testing Action Plan Guidance](#), by supporting educator assessment literacy and classroom assessment practices (formative and interim). Substantial research undergirds the utility and effectiveness of such practices in increasing student academic achievement. ODE will also evaluate the use of our interim assessment system to collect information regarding remote versus on-site administration and the respective impacts on student performance. This will allow us to study the impact of remote administration in a low-stakes environment. ODE will also develop new data collection tools to inform our understanding of the inputs and investments present in our system (discussed in the following section).

### Oregon Survey Information

Our assessment system has not historically collected information about critical education system investments and resources (inputs) or educational processes (e.g., instructional quality). Such a collection has been repeatedly requested by Oregon education and community partners, including by the workgroups convened in 2016 to inform the development of Oregon’s State Plan under ESSA, and identified as a critical need by national experts (e.g., [This is Not a Test, This is an Emergency](#), The Aspen Institute/The Center for Assessment, as well as in *The Standards* [AERA/NCME/APA, 2014, p. 56-57]).

To support classroom assessments for learning, as well as future summative assessment result interpretation, we will develop and administer a student survey measuring *Access to Learning Resources, Opportunity to Learn, and Student Self-Efficacy/Beliefs*. However, the constructs and

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items will be informed by education and community partners during a November-December engagement period. Our goal is to produce a report of selected findings from the pilot informed by feedback from our technical advisors. An operational student survey system will accompany our summative assessments in 2021-22 and beyond. Analysis of student survey responses would allow for more comprehensive understanding of student performance and the factors that affect outcomes in future years, improving the range and quality of information regarding student achievement and learning resources available to our education and community partners.

### *Student Survey*

The student survey will be hosted in our existing test delivery system, so students will have access to all accommodations and supports available on Oregon's statewide tests (e.g., text-to-speech). Student responses will be sortable by ESSA demographic reporting categories (i.e., race, ethnicity, gender, disability status, migrant status, English proficiency, and status as economically disadvantaged). The student survey will address the following constructs:

#### Grades 3-8

- Access to Learning Resources (e.g., internet connectivity, technology, books)
- Opportunity to Learn (reading, mathematics, and science)
- Self-Efficacy Beliefs and Self-Concept (reading, mathematics, and science)

#### Grades 9-12: all of the above, plus two additional constructs

- Extra-Curricular Engagement
- Post-Graduation Planning

The student survey constructs were reviewed by our Technical Advisory Committee (TAC) on October 29, 2020, and ODE made adjustments to our plan accordingly. Oregon's TAC also provided ODE suggestions concerning questionnaires and items Oregon could use to measure the constructs targeted for evaluation including Social-Emotional Learning (SEL) questionnaires (e.g., California Core Districts and ED School Climate Survey), National Assessment of Educational Progress (NAEP), Program for International Student Assessment (PISA), Progress in International Reading Literacy Study (PIRLS), Trends in International Mathematics and Science Study (TIMSS), and other large-scale national and international surveys. Student survey items will be reviewed by education and community partners in November and December 2020 to help ensure that the items align to each construct and use language that is accessible, sensitive, and free of identified sources of bias. Table 2 includes critical research questions that will only be possible to address with the addition of student survey data.



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**Table 2: Research Questions**

Education System Level	Research Question(s)
Oregon Local Education Agency	<ul style="list-style-type: none"> <li>● How do student survey results help inform LEA interpretations of academic achievement?</li> <li>● How can the LEA leverage the student survey results to promote equitable distribution of district resources?</li> <li>● How can the LEA use the student survey results to increase student well-being, classroom instruction, and student outcomes?</li> </ul>
ODE Assessment & Accountability	<ul style="list-style-type: none"> <li>● How do student survey results help inform interpretations of academic achievement in Oregon?</li> <li>● How might summative assessment administration and designs be improved to provide more access and opportunity?</li> </ul>
ODE	<ul style="list-style-type: none"> <li>● How can ODE leverage the student survey results to promote more equitable systems?</li> <li>● How do student survey results inform state efforts to implement federal and state initiatives?</li> <li>● How do the student survey results suggest that Oregon should invest its resources to support student learning?</li> </ul>

National and international assessments have used similar instruments for many years and will provide ODE, our districts, schools, teachers, parents, and students with valuable and actionable information which academic results alone cannot supply.

### *Educator Questionnaires*

ODE plans to report district and state level student survey results for the 2020-21 pilot, alongside educator surveys such as Oregon’s Teaching, Empowering, Leading, and Learning survey (TELL--under reorganization), the Teaching and Learning International Survey (TALIS), the National Teacher and Principal survey, and the ED School Climate survey. Together with statewide summative assessment results, student survey results will provide a more comprehensive overview of Oregon’s education system in the coming years. Analysis of the relationship between inputs, processes, and outcomes should increase focus on areas that are most impacting student opportunity to learn. ODE can then work with education and community partners to remove identified barriers.

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## 2020-21 Strategic Waiver Requests

ODE is committed to equity and acknowledges the need to support our most impacted students to meet their postsecondary dreams in 2020-21 and beyond. Table 3 outlines the requirements within ESSA that ODE is requesting be waived and those that ODE can maintain.

### Engagement

ODE will provide the public and all local education agencies in Oregon with notice of and the opportunity to comment on this request (e.g., by posting information regarding the waiver request and the process for commenting on ODE’s website). This waiver request was published from December 1, 2020 through January 11, 2021 for public comment. Those public comments were incorporated into this version.

ODE has provided descriptions of our 2020-21 commitments in Table 3. The commitments are our formal proposal to the United States Department of Education regarding the procedures and deliverables we will provide in relation to ESSA assessment and accountability requirements. ODE’s proposal will be informed by education and community partners and thus is subject to change and iteration.

Table 3 outlines ODE’s 2020-21 assessment plan in detail.

- **ESSA Requirement:** lists the assessment related portions of federal law.
- **Waiver Requested**
  - **Yes:** ODE is asking to waive this requirement entirely.
  - **No:** ODE is not asking to waive this requirement.
  - **Strategic:** ODE is asking to waive parts of the requirement, but not all.
- **ODE Requests and Commitments:** what ODE plans to do if the waiver is granted.

**Table 3. Waiver Requests**

ESSA Requirement	Waiver Requested? Yes/No  “Strategic” means waiver requested for some but not all parts	ODE Requests and Commitments
Assessment requirements in section 1111(b): the requirements to administer all required	Strategic	ODE requests a waiver of ELA, math, and science summative general and alternate assessments for 2020-21.  ODE will continue yearly ELPA administration

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assessments in school year 2020-2021.		(and IDEA individual diagnostic evaluation and re-evaluation requirements) by focusing our limited in-person, on-site resources.
Accountability and school identification requirements in sections 1111(c)(4) and 1111(d)(2)(C)-(D): the requirements that a State annually meaningfully differentiate all public schools and the requirements to identify schools for comprehensive and targeted support and improvement and additional targeted support and improvement based on data from the 2020-2021 school year.	Strategic	<p>ODE requests a waiver from using 2020-21 data in our school identification process.</p> <p>ODE will consult with education and community partners to develop new comprehensive and targeted support and improvement procedures and data sources for 2021-22 that focus on inputs, processes, and outcomes and are not defined by deficit perspectives.</p> <p>ODE will continue to monitor implementation progress with districts and schools updating plans and approaches to better address the needs of focal student groups given the impacts of the COVID pandemic and shifts to distance learning.</p>
Report Card Provisions Section 1111(h)		
Section 1111(h)(1)(C)(i) (accountability system description).	No	No waiver is requested. ODE will continue to provide a description of our current accountability system.
Section 1111(h)(1)(C)(ii) (assessment results).	Strategic	<p>ODE requests a waiver from reporting ELA, mathematics, and science results for 2020-21.</p> <p>ODE will continue reporting yearly ELPA administration results.</p>

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Section 1111(h)(1)(C)(iii)(I) (other academic indicator results).	Yes	ODE requests a waiver from reporting academic achievement growth for 2020-21 or 2021-22 given the lack of summative data, but will resume reporting growth as soon as feasible.
Section 1111(h)(1)(C)(iv) (English language proficiency assessment results).	No	No waiver is requested. ODE will privilege our on-site resources to support yearly ELPA administration.
Section 1111(h)(1)(C)(v) (school quality or student success indicator results).	Strategic	<p>ODE requests a waiver from reporting chronic absenteeism for 2020-21. ODE cannot report chronic absenteeism due to data inconsistencies.</p> <p>ODE will continue to report 5-year high school completion and 9th Grade On-Track.</p> <p>ODE will report student survey results at the district and state level by student group. Our rationale is the measures gathered as part of the student survey are relevant, actionable, and strongly predictive of student achievement and other student outcomes. Moreover, ODE will provide, via secure file transfer, student-level survey results to schools and districts.</p>
Section 1111(h)(1)(C)(vi) (progress toward meeting long-terms goals and measurements of interim progress).	Strategic	<p>ODE requests a waiver from reporting long-term goals for ELA and mathematics for 2020-21.</p> <p>ODE will continue to report progress toward English proficiency, 4-year graduation, and 5-year completion.</p>
Section 1111(h)(1)(C)(vii) (percentage of students assessed and not assessed).	Strategic	<p>ODE requests a waiver from reporting the percentage of students assessed and not assessed in ELA, mathematics, and science.</p> <p>ODE will report the percentage of students who participate/do not participate in the student</p>

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		<p>survey (state and district levels only).</p> <p>ODE will report summary data of interim assessment system use at the state level.</p>
<p>Section 1111(h)(1)(C)(xi) (number and percentage of students with the most significant cognitive disabilities taking an alternate assessment).</p>	<p>Strategic</p>	<p>ODE requests a waiver from reporting the number and percentages of students with significant cognitive disabilities who are taking an alternate assessment for 2020-21.</p> <p>ODE will report the percentage of students with significant cognitive disabilities who participate or do not participate in our alternate student survey will be reported (state and district levels only).</p>
<p>Section 1111(h)(2)(C) with respect to all waived requirements in Section 1111(h)(1)(C) as well as 1111(h)(2)(C)(i)-(ii) (information showing how students in a local educational agency (LEA) and each school, respectively, achieved on the academic assessments compared to students in the State and LEA).</p>	<p>Strategic</p>	<p>ODE requests a waiver from all academic achievement reporting for 2020-21.</p> <p>ODE will report student survey pilot and alternate survey pilot results at the state and district levels for 2020-21.</p>

*Connection to Perkins V*

Oregon’s summative assessment results are an integral part of supporting career and technical education (CTE) program quality; results drive the spending of Perkins state leadership funds and the provision of targeted support to Perkins grant recipients. ODE will use data from the 2019 assessment until new summative assessment results are available. Given this, ODE will reexamine our state-determined performance targets for CTE and determine if they need to go through a revision and public comment process. At the local program level, ODE will support

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the use of local assessment data, including interim assessment results, during the CTE comprehensive local needs assessment and in driving local program improvement.

### *Other Potential and Ongoing Developments*

The Oregon Legislature passed landmark legislation in 2019 in the [Student Success Act](#), investing a projected \$1 billion dollars per year into early learning and statewide education initiatives. The Student Investment Account establishes [progress markers](#), which are indicators of education system progress toward continuous improvement, as a requirement for all districts. One of the long-term progress markers is, “Educators have a balanced assessment system in place to help them identify student learning in the areas of reading, writing, research, speaking, and listening that are clearly connected to Oregon’s English Language Arts and Literacy Standards.” The Student Investment Account education and community partner engagement process was substantial and provided ODE with a clearer understanding of what our educators and communities wanted from our education system. ODE evaluation of district progress markers within the Student Investment Account continues as is and it is not contingent upon summative assessment results.

In addition to the formal survey commitments listed in Table 3, ODE will work with education and community partners to chart a course for future data gathering, such as determining how to collect similar survey information in Grades K-2 and evaluating the performance of our pilot student surveys in 2020-21. In 2020-21, ODE will begin developing enhanced reporting systems which will include student survey data. These data can be combined with academic-achievement-based systems to address our research questions.

ODE will work with education and community partners to review at least the following additional indicators of school quality and student success in designing more comprehensive approaches to accountability in the coming years.

- education and community partner engagement.
- better incorporate social-emotional learning, student voice, and experience.
- better model growth and change across multiple indicators.
- better reflect access to and success in advanced college and career coursework and opportunities.
- better align federal and state accountability.

ODE expects to add several critical indicators into our accountability system that point to current inequities that interfere with learning in our education system, for example, differences in student access to broadband internet in the home. We will also expand our view of accountability to go beyond mere outcomes and include school and district context, inputs, processes, and outcomes.

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### Conclusion

This is not the time for high-stakes accountability. This is the time for care, connection, and support.

This is not a time for deficit thinking and behaviors, discussions about learning loss, or so-called achievement gaps. This is a time for reviewing our investments that define opportunity gaps and leveraging available resources efficiently to support learning.

This is not a time to subject families and educators to additional stressors that would be required for remote administration of summative assessments. This is a time to support families and educators to use their funds of knowledge and exercise their own assessment muscles, while receiving support from ODE in those efforts.

As stewards of Oregon's resources, we cannot take risks that promise only indefinite benefit. We invested in practices that we know will make us better able to meet the needs of our students, this year and in years to come.

Thank you for your consideration.