



CONFEDERATION OF OREGON SCHOOL ADMINISTRATORS

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M E M O R A N D U M

TO: Susan Castillo, Oregon Superintendent of Public Instruction
Ben Cannon, Education Policy Advisor to Governor Kitzhaber

FROM: Craig Hawkins, Executive Director, COSA

DATE: January 10, 2012

RE: COSA Comments on Oregon's Draft ESEA Flexibility Waiver Request

Thank you for the opportunity to comment on Oregon's first draft of its ESEA Flexibility Waiver Request. We appreciate the concerted effort you are making to elicit feedback from Oregon educators, parents and other interested members of the public. We also want to thank you for your commitment to effectively and appropriately utilize the feedback in developing the next draft of the waiver request.

We have analyzed and discussed the waiver request with a number of Oregon superintendents and administrators – including many who participated in the work group process, as well as many who were not part of the work groups. Three general areas of comment have emerged from those discussions.

First, we want to commend you for successfully undertaking the development of this waiver request, and doing so in cooperation with stakeholders – especially given the challenging timeline afforded to this process. Overall, we believe that, if Oregon's request is approved and thoughtfully and collaboratively implemented, the ESEA waiver will result in an improved accountability system for Oregon schools. Just a few areas of the waiver request appreciated by Oregon administrators include:

- Much more substantial inclusion of student academic growth,
- Continued emphasis on closing the achievement gap and continued commitment to disaggregate student achievement data,
- Expanded flexibility related to the 5-year cohort graduation rate, which aligns with making progress toward achieving Oregon's "40-40-20" goals,
- An Oregon Department of Education shift from a compliance focus, to a service and support focus, and
- An emphasis on more meaningful college- and career-ready measures, and broader measures of student achievement and growth.

Second, many administrators have noted that the waiver request development timeline was too short to allow the level of meaningful participation desired by many interested parties, especially given the complexity of the project. Perhaps not coincidentally, review of the waiver request has resulted in a number of concerns and questions for Oregon school leaders. **Without question, the most consistent concern expressed by superintendents and administrators is whether Oregon, at state and local levels, has the capacity to develop and implement the commitments contained this ESEA Flexibility Request Draft.** School districts and the Oregon Department of Education (ODE) are dramatically under-staffed and under-resourced; while district and ODE staff will no doubt work diligently to meet the commitments outlined in the waiver, change of this rapidity and magnitude will certainly require significantly greater investment. Examples of the many questions superintendents and administrators have raised are:

- Is the use of “median growth” the right way to approach student growth and school accountability? (Many administrators questioned this approach.)
- How will Achievement Compacts and the CIP co-exist – or should they? Will Achievement Compacts supersede some state and federal accountability requirements?
- Have we considered the potential student achievement impacts – not to mention the resource challenges – for “model” schools in the Continuous Improvement Network?
- Budget and resource challenges have a direct bearing on meeting accountability expectations. How has this been factored into the process?
- Will the Oregon report cards described herein actually serve to help the public better understand how their schools are doing?
- Should Oregon actually be seeking a waiver, given the costs we could incur in implementing the requirements?
- Will waiver requirements disappear after ESEA reauthorization?

Third, this waiver request appears to have been intentionally – and rightly – developed with a focus on well-defined core elements, but also with some ambiguity around still-to-be-determined specifics of how the core elements will be implemented. As the saying goes, **“the devil is in the details” – as is, we think, the opportunity.** Oregon’s superintendents and administrators appear to be, for the most part, philosophically aligned with the core elements in the waiver request. Successful implementation will require true collaboration and partnership, some compromise and creativity, and additional resources.

COSA and our members stand ready to work constructively with you and other education stakeholders to make sure this waiver positively impacts Oregon students and schools.