Dear Oregon Education Investment Board,

Thank you very much for the opportunity to comment regarding Achievement Compacts.

1. Overall, the Oregon School Boards Association prefers that the system and measures be as simple as possible, and allows maximum flexibility in recognition of the great differences among Districts and Oregon's tradition of local governance.

Some specific comments are:

- The compact includes a reporting category, "pilot outcomes." Use of the word "pilot" might imply that the programs or methodologies are untested or not yet backed by research. OSBA would prefer the term "district specific local outcomes."

- The draft compact provides space for only 3 pilot outcomes. Local boards and districts need flexibility based on their unique circumstances, and are most excited to share what is working in their communities. If we limit it to 3, we may be artificially limited the listing and sharing of best practices. OSBA would ask that districts be allowed to list at least 5 and up to 10 local outcomes.

- The OSBA believes the 4 year goal setting may be too much for the first year compacts and may be more appropriate for subsequent compacts. First, the compacts will not have validated data for the 2011-12 school year, and districts will be setting goals for the following year without final data from this year. This would be challenging enough for year to year goal setting, and even more difficult four years out. Second, 2012-13 will be the first year of the compacts, and districts will only have 60-90 days to do the work rather than an entire year to plan and goal set, which doesn't coincide with the districts' timetable, or a deliberative, participative process. Due to the compressed window to set goals and the fact that no one has done a compact before, it may be premature to ask districts to set goals four years into the future when they don't have time for input or good data. Additionally, many districts are in "crisis" mode due to the recession and are cutting programs, days, and laying off staff. Long term planning may not be effective in such an environment.

- Not all Districts have equal access to college credit courses. Please consider broadening the "Earning 6+ College Credits" quality measure to include other college readiness experiences, or providing college readiness experiences as an example under the "Pilot Outcomes [District Specific Local Outcomes]" category.

2. Regarding accountability/achievement under the compacts, OSBA wants a system that assures stable, adequate funding.

Specific comments are:

- As the compacts are drafted, please keep in mind the eventual link between the compacts and school funding. OSBA urges development of a system that is based on working with Districts to improve their outcomes, rather than withholding funding.
- The latest draft adds "other [local] funding" to the "investment" section. This could have the unintended consequence of being a disincentive to passing local option and/or construction bond levies, if they reduce State School Fund support. Compression with the decline of property values could further jeopardize funding in Districts that have approved local options

- The QEM recommendation is a state school fund number, and the actual state funding per district will vary greatly. Some districts get no state school fund dollars and some get almost all of their money from the state school fund. OSBA would encourage adding a box for "local funding from property taxes" and retitling the "state funding" box to "state school fund support." Also, the row titled "other" needs to be defined. Is it federal money, local option, bonding funds? The box may be confusing; adding the sums of the three boxes could give the inaccurate result that some Districts are getting more than QEM funding. We want to assure that we are comparing apples to apples and not mixing up funding streams that are not comparable.

3. Regarding the state's role in implementation, some basic guidance such as timelines and procedures will be helpful. Overall, however, OSBA prefers that there be a minimum of state restrictions and requirements, and that local Districts have maximum flexibility in how they achieve results.

Thank you again for allowing OSBA to comment, and for your hard work in considering the perspectives of such a broad range of stakeholders. Please feel free to contact me at 503-481-9480 if you have any questions.

Best regards,

Betty Reynolds, PhD
Representing Oregon School Boards Association
West Linn Wilsonville School Board
OSBA Legislative Policy Committee