Hello Seth and Ben,
I hope that you can forward these question to the OEIB.

Most states that have been approved for the waiver will depend on the not-yet-written assessments of one or both of the multi-state consortia aligned with the Common Core State Standards. (I will be referring to this document form the Center on Education Policy throughout.)
http://www.cep-dc.org/cfcontent_file.cfm?Attachment=Riddle%5FPaper%5FWaiverApp%5F021712%2Epdf p.5

There is no evidence that the new common core standards will improve achievement. ***Major Accountability Themes of Approved State Applications for NCLB Waivers***
http://www.brookings.edu/reports/2012/0216_brown_education_loveless.aspx

- How can Oregon policy makers claim that a student will be "on track" for college/career based on an unwritten assessment for standards that are not expected to appreciably improve outcomes?
- Will Oregon use summative measures like the OAKS and/or "standardized interim" SBAC measures for outcome based budgeting?
- **How much will it cost the state <u>and</u> local school districts to adopt the common core standards and SBAC assessments?**

Tony Alpert has testified for SBAC at the Accountable Schools Task Force Meetings. He has admitted that no state has created any assessments for ELL and SPED students (particularly those with extreme disabilities) well. SBAC intends to create assessments for 5 different English language learner sub-groups. The Colorado "growth model" is touted as one that Oregon will follow as reforms move forward.
pp 9, 10
In one state, Colorado, all major accountability decisions will be based on some factors with no disaggregation of student groups (achievement and growth), and other factors (growth gaps and postsecondary and workforce readiness) that will be based on an aggregation of determinations of academic growth gaps and graduation rates for disaggregated student subgroups. Those subgroups will be the same as those under NCLB statute, except that all non-white racial and ethnic groups will be combined into a single group, and a new "catch up" student group (students below proficient in the prior year) is added.

- How can states avoid mediocrity when tracking is dependent on normative data, such as done with the Colorado growth model?
- Will Oregon similarly create super-sub-groups?
- Will Oregon ELL and SPED advocates have any opportunity to impact SBAC assessments for these sub-groups?

I have described data reporting differences for graduation rates and drop-out data at Riverdale High School. There may be human inputting errors that can flaw this data. The poorest schools have the highest mobility where drop-outs may be over-reported. Further, schools of choice (charters, magnets and "tuition" public schools like Riverdale) can send a student back to their

home school for behavioral or academic reasons. (Recently two Freshman students from Riverdale were sent back to their home districts for taking pot to school!)

- Will the Oregon Department of Education assist low income, higher mobility schools so that drop-out statistics are not over-reported?
- How will drop-out statistics take into account the advantages of schools of choice?

States that have been approved for the waiver have tended to create complex adequate measurable objectives (pp. 6,7), in contrast to the recommendations coming from the National Governors Association. From Tim Nesbitt's testimony, it sounds as though Oregon will pursue a hybrid where there are common measures and local measures for a locally derived achievement compact.

- Will Oregon set a trajectory for achieving 40/40/20?
- If so, will the state choose different outcome measures or possibly a different testing consortium to reach the 40/40/20 goals?
- **What are the projected costs at the state <u>and</u> local level for curriculum, assessments, professional development, consultants, computers, data warehouses, statisticians, etc. to implement the 40/40/20 goals? How will that data be made transparent to the public?**
- **As resources in districts vary, how will the state support schools with the start-up costs, especially for low-income communities?**

And if follow up to that last bullet, Title I allocation of funds has changed significantly over the past decade. The distribution of the basic grant has shrunk considerably. See below. http://febp.newamerica.net/background-analysis/no-child-left-behind-act-title-i-distribution-formulas

- **Will the OEIB change allocations of all Title I funds change with the new focus and priority schools?**
- **If so, will LEAs have more or less control of their Title I funds?**

Todd Jones has done a good job in compiling data from the community forums where we "meaningfully engaged." http://www.edweek.org/ew/articles/2011/11/09/11waiver_ep.h31.html

Parents and community members at the forums were very vocal in their desire to get away from punitive testing. We have heard Whitney Grubbs say that Oregon will "stand firm."

- Will the OEIB survey Oregonians or have more forums to discuss the implementation of common core standards and assessments and achievement compacts once we get more information on measures (particularly for ELL and SPED students), implementation costs and Title I funding re-allocations necessary for waiver compliance?

Respectfully,

Kris Alman

Source: U.S. Department of Education Budget Tables
http://febp.newamerica.net/background-analysis/no-child-left-behind-act-title-i-distribution-formulas