

This is a reminder ahead of proposed Division 22 rule changes on TAG (non)compliance reporting timelines slated to take place tomorrow re: Operating Policies and Procedures 581-022-2305.

I would like to remind you that the true issue is that ability learning (TAG services) ARE NOT readily or automatically available to all students (ELL, low SES, racial minority or otherwise). One may argue that compliance reporting is only a check box (the assumption being that PPS will follow mandates and be in compliance). The reality however is that PPS has been out of compliance 15 out of the last 20 years and for those years they've been technically (but not actually) *in compliance* parents have fought through advocacy and formal complaints to force the implementation of services. SINCE PPS HAS NEVER IMPLEMENTED A SYSTEMIC PLAN.

PPS has yet again developed a "vision" (loosely referred to as a plan) which does NOT include a budget, teacher training, curriculum, an implementation schedule or overarching structure.

Many TAG plans floated before the public over the years might be great as thought projects but until PPS actually implements a plan they tend to grate on the nerves of parents whose children are aging out of the system during the only years they may (in theory) take advantage of free education. If you care to be mildly entertained (or perhaps deeply annoyed) you may read the latest "plan" here:

http://www.tagpdx.org/PPS_TAG_Proposal_2018-9.pdf

It *sounds* sort of okay in a wordy, repetitive way until you realize it's a rehash of exactly every other nonspecific plan exactly NEVER delivered to the students of Portland.

I am a member of but do not speak for TAGAC (TAG Parent Advisory Council) in this communication but it should be noted by those with the power to make changes (namely, you) that TAGAC developed a Year-End Report which puts PPS to shame in terms of statutes and practical logistics. You may find it here: https://drive.google.com/file/d/0B97jVsk_dI-GdHZvaTA2ZGx2Y1pMLWRUblIQNmMyN1B0YjF3/view

One year in to Superintendent Guadalupe Guerrero's administration and we finally have a (very) weak statement of intent for ability based learning, the capping and splitting of the Access Program (the only District gifted program), a deterioration of high school math and science standards and a proposal for decreased instructional hours in a city with low instructional hours to begin with and one of the lowest graduation rates in the nation. It's sad that given all the talk of stakeholder input and world class education what we're actually seeing is extremely limited stakeholder engagement coupled with a deterioration of in-class opportunity.

Part of the Division 22 protocol involves community input. You have not listened to parents who've advocated for ability based educational opportunities FOR YEARS. It should not be up to parents to compel adherence to policies and procedures. That's your job. Past tense reportage on noncompliance will further exacerbate the situation and is suggestive of a "check-the-box" mentality divorced from on-the-ground impacts. We need oversight, not institutionalized neglect.

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Subject: Division 22 rule changes re: PPS

Dear Esteemed Legislators, Representatives and Board Members,

It is very disappointing to learn that yet again, rather than provide legislative action to ensure the funding of Division 22 mandates regarding student health, physical education (PE) and talented and gifted (TAG) instruction, accountability rules are being toyed with in an effort to elude responsible implementation of these vital programs.

The suggested rule change to Division 22 compliance standards retroactively checks a box of noncompliance with no assessment of the current state of program or service implementation. This will render stakeholder input perfunctory at best since Portland Public School administrators may simply claim a plan for future performance whether that plan materializes or not. And unfortunately, PPS has a history of claiming present compliance through future intent. TAG mandates in particular have been projected into the future and yet ignored by PPS administrators for years on end. Thousands of Oregon students, ready, able and willing to learn have been denied advanced coursework commensurate with their abilities.

As recently as 2016 Chris Russo (then Assistant Superintendent for Teaching and Learning) testified before the PPS School Board that although TAG was at the time (and since) nonexistent district-wide, PPS should be deemed in compliance with Division 22 requirements simply because administrators were "thinking about" and "planning for" the implementation of services. He was so uncertain as to whether planning was tantamount to action that he appealed to higher educational powers for a verdict. PPS soon thereafter admitted they were out of compliance with TAG mandates. (Please see the linked board meeting and begin watching at 2:05 for a complete rundown of apologies and excuses made for why "complex" ability learning is not routinely available to the students of Portland as it is for other urban students nation-wide.)
<https://www.youtube.com/watch?v=KGZtlMIZSyg&list=PL8CC942A46270A16E&index=116&t=0s>

In 2017 he then again sought to claim compliance status and followed up with an interview with KOIN news. He tried to explain the rationale for compliance vs. noncompliance re: Division 22 but failed to detail any progress during the intervening year: "... when plans for services change – because those plans have not yet been implemented – the district must mark that it is not

in compliance. The new plan for TAG services has not yet been implemented, therefore the district had to mark that it is not in compliance....," he said. "Because we're doing all that work, we're basically redoing the program, so we marked noncompliance," he said. "Any time you're retooling your curriculum, you mark 'no.' It is the same story with the district's science, social studies and health/PE curricula. There are updated standards that the district is working to implement," he said. "Is the entire program (implemented)? No. Is articulated throughout the entire district? No," Russo said. <https://www.koin.com/news/pps-fails-to-comply-with-state-standards/870064878>

In case you didn't catch that, "no" there were no district TAG services in 2016 despite "plans" to implement a "Scholars Program." There were also none in 2017 and despite vague assertions to the contrary (aka suggestions floated as to a "continuum" of nonexistent services) there has not been consistent district-wide implementation of any type of cohesive TAG plan whatsoever. In the interim, while administrators draft plan upon plan they never actually implement, Portland students lose their right to ability based learning during their formative years at the only point in their short lives when education is free to them.

This is not leadership. It's not even governance. This rule change represents an overt attempt to institutionalize neglect.

It is particularly egregious that in our beautiful state of Oregon we have one of the lowest graduation rates in the nation and yet TAG represents the very educational opportunities critical to student success. Portland Public Schools has been out of compliance with TAG mandates 15 out of the last 20 years. But it's not due to a lack of interest! Portland parents have advocated for TAG services since at least 1997 and formed the TAG Parent Advisory Council (TAGAC) as a result of their continued advocacy on behalf of our students.

If you look to the board testimony linked above you will hear former TAG Director Andrew Johnson repeatedly state that 1) parent input and advocacy is crucial (and specifically applaud the efforts of TAGAC) and 2) outline the ways in which PPS has failed to support ability based (or rate and level) learning through curricular development, professional development, planning, implementation and basic funding. As it stands now, Superintendent Guerrero has outlined no plan for TAG services and has in fact vacated the position of TAG Director while weakening high school math and science curricular standards.

If anything, we need more oversight at this critical juncture, not less.

Natalie Hval, PPS Parent

For further information on TAG advocacy see:

<https://portlandtribune.com/pt/9-news/290306-167379-tag-parents-speak-out-against-district->