

September 21, 2022

Chair Guadalupe Martinez Zapata
Vice-Chair Jennifer Scurlock
Members of the Oregon State Board of Education

RE: SB 744 – Review of Oregon Graduation Requirements

Dear Chair Martinez Zapata, Vice-Chair Scurlock, and members of the Oregon State Board of Education,

We write to express significant concerns with recommendations presented by the Oregon Department of Education (ODE) in [Community-Informed Recommendations for Equitable Graduation Outcomes](#), a report reviewing Oregon graduation requirements as directed by [Senate Bill 744](#).

The report contains [important and relevant insights shared by Oregon students, parents, and education stakeholders](#) about their experiences and expectations related to Oregon's high school diploma. However:

- The report raises, but fails to address, significant and troubling questions about how Oregon's K-12 system is failing many students and driving disparities along the path to graduation.
- The report's recommendations do not fully reflect or align with the feedback that ODE received through the community engagement process.
- Community voices and education stakeholders were not involved in the analysis of data, nor did they have an opportunity to review the recommendations included in the final report.
- The report oversimplifies the problem and solution by removing graduation requirements without a vision or plan for system improvement and accountability.

Without closely examining how ODE and local school districts operate in practice to apply graduation requirements and guide students toward graduation, it is difficult to evaluate whether the specific and technical recommendations that ODE is proposing are an appropriate response to the community input and the troubling data spotlighted in the report.

At this stage, we urge the State Board of Education to reject the recommendations in this report and direct further inquiry into how Oregon's education system can provide the high quality learning opportunities, supports, and skills that all youth need as they work toward a high school diploma.

This report raises troubling questions about Oregon’s K-12 system that call for further review

The report acknowledges that even before COVID-19, Oregon’s education system was not providing all students with access to high-quality instruction, programs, and support throughout their public school experiences. The data that ODE highlights raises significant and troubling questions about whether and how the system is currently serving K-12 students in Oregon. These questions include:

- **Whether our graduation rates have increased in part based on misuse of the modified diploma.** Per the report, “It is possible that graduation rates are increasing because the system incentivizes graduation, not because students are experiencing high quality learning opportunities.”
- **Whether the modified diploma is being misused and disproportionately applied to BIPOC students and English Learners.** Per the report, “Oregon’s education system is graduating students with different diploma types in ways that are patterned by race/ethnicity.”
- **Why a larger proportion of BIPOC students are demonstrating essential skills through work samples than their white peers; why students would be required to prepare work samples outside of their normal classroom instruction; and why our state lacks the capacity or will to validate district work sample processes.** Per the report, “Because ODE does not have capacity to implement a monitoring system to help ensure that those work samples are being scored reliably, they may be a source of educator biases.”
- **Whether course completion alone would be an appropriate or reliable demonstration of knowledge and skill.** Per the report, “ODE heard from students and educators that grades can be volatile and inaccurate; we also heard that educator grades are the best representation of student achievement.”

These are complex and critically important issues that deserve and require further review. We must understand what processes and practices at the state, district, and school level are producing these unacceptable disparities and failures to support all students.

The report’s recommendations do not fully reflect or align with community feedback

As directed by SB 744, ODE engaged in a robust community engagement process despite an accelerated time frame and pandemic-related challenges. The process resulted in rich input from a significant number and diversity of Oregonians. Many of the report’s findings suggest strong areas of alignment around what Oregonians value and hope for all students, including what knowledge and skills our youth need in order to succeed and thrive in life. These areas of alignment can serve as the building blocks of a shared vision for what a high school diploma in Oregon should achieve for students.

For instance:

- Broad agreement that skills such as math, reading, and writing are core to learning.
- Additional skills and competencies—such as communication, critical thinking, and life and career skills—are also important.
- Math offerings should both reflect students’ interests and have direct, practical applications for careers, education, and other life paths after graduation.
- Students should be offered flexibility, pathways, and options that recognize the unique strengths and needs of each child.

However, the report also highlighted differences in perspective and key tensions that are ripe for further discussion:

- Desire to further explore how Oregon’s required courses reflect the level of proficiency required for future success.
- Lack of clarity around how the system does or should ensure that course grading practices are rigorous, equitable and comparable across the state.
- Disagreement around how proficiency in math, reading and writing should be assessed.
- Distinctions in which additional skills are essential and how to deliver, assess and support students in attaining them.
- Deep disagreement around the purpose and use of the modified diploma.

Unfortunately, rather than building on areas of alignment and leaning into areas of disagreement, the recommendations make unsupported leaps to solutions without exploring key tensions or seeking to understand where current systems are failing students along the path to graduation.

Community and education stakeholders did not inform the report’s data analysis and recommendations

While ODE invited broad engagement around the questions posed by SB 744, the research, data analysis, meaning making and conclusions were done without community review or participation. ODE offered no opportunity for community participants to reflect on the findings, and recommendations were made without any opportunity for stakeholders and advocates to engage, ask questions, or explore alternative interpretations or solutions. While the report claims to represent community vision and plan for addressing disparities, it ultimately raises more questions than it answers. As a result, the final recommendations provided are more disjointed than purposeful, intentional, or aligned to what Oregonians said they would like to see.

The report lacks a vision or plan for system accountability and improvement

The report's recommendations simply propose rolling back existing requirements without proposing more effective and equitable alternatives. Many states are exploring and implementing new approaches to ensure their education systems are meaningfully providing high-quality instruction to all students. Whatever methods we use, Oregon needs a clear and compelling strategy to understand how our children are learning and growing, and how the state can more effectively oversee our system's strengths and shortcomings. Those are essential conditions from which to build a culture of continuous system improvement that supports educators, local school districts, and ODE to better serve all students, especially those who have been historically underserved and marginalized by current policies and practices.

Moving Forward

As Oregonians, we hold high expectations for students because we believe in the boundless potential of every child. But when state leaders fail to hold Oregon's education system accountable to demonstrating whether and how it is serving all students, it risks leading Oregonians to believe that our state is lowering expectations to artificially mask disparities and improve outcomes. This impression sadly reinforces a false and deeply prejudiced narrative that certain student groups are inherently unable to meet high expectations based on their identity, zip code, disability, or circumstances. Nothing could be further from the truth.

But simply setting high expectations for students through graduation requirements is not enough. It's critical that we hold high expectations for our education system and its responsibility to better support all students along their paths to graduation. Oregon's education system must be equipped to provide high-quality and personalized instruction that meets the unique needs and dreams of every child while also fulfilling our shared goals for all children to have the knowledge and skills they need to succeed and thrive in life.

We appreciate the opportunity to share our input on this important issue. Thank you for leadership and consideration.

Sincerely,

Whitney Grubbs
Executive Director
Foundations for a Better Oregon

Christy Reese
Executive Director
FACT Oregon

Sarah Pope
Executive Director
Stand for Children, Oregon

