



# Oregon

Kate Brown, Governor



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**Colt Gill**

Deputy Superintendent of Public Instruction

**SB 222: Vision Screening Reimbursement**  
**Senate Education Committee**  
**February 3, 2021**

Chair Dembrow, Vice-Chair Thomsen, and members of the committee, I am Jessica Ventura, Government Relations Director for the Oregon Department of Education (ODE). Thank you for the opportunity to provide testimony on Senate Bill 222.

Current vision screening law requires that education providers collect vision screening certificates from students who are seven years of age or younger and are beginning an educational program with the education provider for the first time. In 2017, the Oregon Legislature passed Senate Bill 187 providing \$1 million in funding per biennium to establish a reimbursement program for school districts in Oregon to be reimbursed up to \$3.20 per each student for costs incurred to provide vision screenings. Vision screenings can be conducted by school nurses, trained school staff, or by ODE-approved vision screening providers. This funding allowed for education providers, who filed for reimbursement, to be reimbursed for all students grade 3 and younger. For the 2019-2021 biennium, the amount available for reimbursement was doubled to \$2 million to be able to cover more students affected by poverty beyond grade 3.

In accordance with the law, ODE has implemented a reimbursement program to cover costs for screenings per student screened. This program requires the collection of reimbursement forms, including individual student information required for cross-checking and accountability, from school district applicants. With these reimbursed funds, school districts can then pay community providers for screening services and/or use them for their own vision screening services. One challenge voiced by community providers, is that they may not always receive payment from school districts.

SB 222 adds language to allow “a person” to be reimbursed directly, rather than “an education provider” per student screened. This will allow non-profit and community entities to apply for reimbursement and be reimbursed directly by ODE. This bill also adds \$.5 million to the Vision Health Account in this statute, increasing the program total from \$1 million to \$1.5 million, which will allow more students to have access to vision screens after third grade. Adding more resources can have significant equity impact for not only students with disabilities, but also other traditionally underserved students, including those who may be impacted by systems associated with race, poverty, housing insecurity, and/or geography, who may not have access

to regular prevention-oriented health screenings or who may have been historically harmed by medical and healthcare institutions.

The Vision Screening Program at ODE is currently understaffed especially in light of the increased resources allocated to the program by the legislature for the 2019-2021 biennium. ODE has a Policy Option Package to increase funding and position authority to more adequately administer this program.

There are responsibilities that would shift as a result of this proposal; SB 222 will move the burden of due diligence for cross-checking student ID numbers from school districts to ODE. When “educational providers” were providing required information for reimbursement, school districts were verifying their own student information and aligning State Student Identification Numbers. By allowing “persons” to reimburse, ODE must take on the duty of cross-checking data provided with ODE enrollment information. Based on the already proposed POP, and considering the impact of this bill, ODE will require an additional .5 FTE, to manage and administer the Vision Screening reimbursement program. Further expansion of the program through this bill will make the need for enhanced funding for staffing and appropriate position authority even more acute.

In addition to staffing considerations for ODE, there are other concerns to note in making changes to the program:

- To ensure accountability, this program requires the collection of State Student Identification Numbers (or student birth dates from pre-k programs) for students screened. If persons or non-profit entities will now be applying for reimbursement, persons or non-profit entities would likely collect and store student identifiable information will. There are concerns about ODE liability in the case of a potential data breach, and we may need to seek legal counsel on this subject.
  - In order to assuage the privacy and data concerns, this bill could be rewritten to create a grant program where funds are provided for services, not reimbursed per student screened.
- School districts will also face additional administrative burdens because they may have to track and submit reimbursements separately. For example, if a non-profit entity screens 300 students in a school district and school nurses screen 50 students, school districts would have to submit a reimbursement request for 50 for their own screening services, while also approving the non-profit’s direct

reimbursement of 300. This may cause confusion and increase administrative hurdles.

- This may also require school staff, including school nurses, health assistants, and secretaries to spend more time coordinating, record keeping, and supervising volunteers as vision screenings expand.

Overall, we fully support adding resources to expand vision screening access to students across the state. We are more than happy to work with the Committee to provide more input and address outstanding concerns with the proposal.

Thank you for your time, and we welcome any questions you may have.

Respectfully submitted,

Jessica Ventura

Government Relations Director