



Oregon
Tina Kotek, Governor



OREGON
DEPARTMENT OF
EDUCATION

Oregon achieves... together!

Dr. Charlene Williams
Director of the Department of Education

TO: Chair Neron, Chair Frederick & Members of the House and Senate Education Committee

DATE: Apr 8, 2025

FROM: Zoe Larmer, Government Relations Director

RE: Questions posed regarding SB 141 / HB 2009

Chair Neron, Chair Frederick and Members of the House and Senate Education Committee,

Thank you so much for the opportunity to share more information on SB 141 / HB 2009. We look forward to our continued partnership on behalf of all Oregon students. Please do not hesitate to reach out to me if you need further clarification.

With gratitude,
Zoe Larmer

Structural Questions

1. Section 5, subsection 4 of the -2 amendment requires districts to accept coaching if they don't meet their goals, but it does not specify what ODE's obligations are. Is the expectation that ODE will provide coaching to ALL districts that don't meet their goals? Or just some districts? The bill needs to specify that so that we can get a true sense of what this will cost.

This has been addressed in the -5 (Section 5 - Page 7, Line 10 – Page 8, Line 1).

For additional context, the Department offers customized coaching to any school, district, or ESD upon request, while participation in the Intensive Program is targeted at the highest-need districts across the state and is extended through an invitation process. Currently, there are 13 schools/districts/ESDs participating in customized coaching and 4 districts participating in the Intensive Program. With the proposed legislation, opt-in customized coaching will still be available to districts on an “as needed” basis, with directed coaching and participation in the



Oregon
Tina Kotek, Governor



OREGON
DEPARTMENT OF
EDUCATION

Oregon achieves . . . together!

Dr. Charlene Williams
Director of the Department of Education

Intensive Coaching Program being mandatory. **The intention of the Department is that with the continuum of supports being structured and communicated strategically with the field, we will be able to lean on preventative measures prior to moving toward more corrective measures such as directed coaching, the Intensive Coaching Program, and directed funding.**

Clarifying the entry and exit criteria, which will be done through rulemaking, will help ensure consistency and transparency in the coaching process moving forward. Ultimately, the goal is to align these efforts with the essential need to support our scholars and ensure their academic success.

2. The proposed -2 amendment would require the new metrics to begin during the 2025-26 school year. What is ODE's capacity to complete all of the administrative actions ahead of the 2025-26 school year? How does this new start date impact the timeline for completing administrative actions? How will districts be expected to adapt to the use of new metrics in the next school year when planning for next year is already underway?

The -5 amendment addresses this. Three new metrics will be co-developed in March of 2026 and those metrics will begin review during the 2026-2027 school year.

The Department is in the process of developing an action plan that will outline outcomes, milestones (3 months, 6 months, 12 months, and 18 months), and deliverables aligned with the proposed legislation. This action plan will be delivered to the Legislature no later than June 30, 2025. In December 2025, the Department will report back to the Legislature on progress toward meeting outcomes and milestones. One key priority area that the Department is currently focused on is streamlining reporting, with the goal of creating five reports that align with the Priorities for Student Success. This process will be completed by Spring 2026 with consolidated reporting being implemented at the start of the 2026-27 school year.

a. Follow-up – How does this new start date impact the timeline for completing administrative actions?

Addressed above.



Oregon
Tina Kotek, Governor



OREGON
DEPARTMENT OF
EDUCATION

Oregon achieves . . . together!

Dr. Charlene Williams
Director of the Department of Education

- b. **Follow-up – How will districts be expected to adapt to the use of new metrics in the next school year when planning for next year is already underway?**

Addressed above.

3. **For meaningful, shared accountability, what agency targets and measures of progress are being considered for the Department of Education in this bill to set school districts up for success?**

Setting School Districts up for Success - The current plan outlined below will be revised and updated as bill language solidifies and ODE determines the best way to meet the expectations laid out by the Governor and the Legislature.

- **Measures of Progress Aligned with Current Administrative Actions:**
 - **March 2025** - Action taken to begin process that will minimize duplication of reporting efforts for districts
 - **March 2025** - Hired a Deputy Director of Operations
 - **March 2025** - Engagement with other states who have successfully aligned programming. Use lessons learned to shift from individual grant reporting to holistic reporting around the five student success priorities, similar to our sister agency in Louisiana.
 - **April 2025** - Engage with school districts, partners, ESDs, CBOs in order to identify what other information should be included on a transparency dashboard.
 - **June 2025** - Draft action plan for implementing Accountability legislation (including refined targets)
 - **June 2025** - Inventory current data collections and determine what efficiencies are feasible
 - **June 2025** - Contract with a third party to inventory agency staff work and capacity; restructure and reallocate staff time and capacity to create efficiencies and systematize processes.
 - **Fall 2025** - Host regional workshops and technical assistance to support research-based instructional practices, the importance of implementing



Oregon
Tina Kotek, Governor



OREGON
DEPARTMENT OF
EDUCATION

Oregon achieves . . . together!

Dr. Charlene Williams
Director of the Department of Education

high-quality instructional materials, ongoing community engagement, needs assessment, and continuous improvement planning processes.

- **August 2026** - Reduce the number of reports collected by ODE into five coherent narrative reports centered on student success priorities.
- **Ongoing** - Develop a plan to refine/renew staff work and responsibilities that aligns with a comprehensive vision and strategy for accelerating student academic outcomes.
- **Ongoing** - Increase accountability by publicly posting school districts' data in user-friendly formats, including related to graduation, 9th grade on-track, 3rd grade reading, regular attendance.
- **Ongoing** - Deploy cross-office "district support teams" to improve efficiency and efficacy of support - including technical assistance, professional learning and development, and coaching.

Further, the -4 amendment (now incorporated into the -5) requires the department to report to the Legislature by mid-December on their work to improve grant consolidation, reporting, data collection and public transparency; improve and align internal operations across programs and offices in ODE; and organize state and regional efforts to elevate best practices and responsive support for school districts **before the 2026- 2027 school year**.

a. **Follow-up – How will ODE track its progress on implementation?**

The Department is in the process of developing an action plan that will outline outcomes, milestones (3 months, 6 months, 12 months, and 18 months), deliverables, with action-oriented tasks aligned with the proposed legislation. This action plan will be delivered to the Legislature no later than June 30, 2025. This action plan will be a living document that is updated weekly (at minimum) with progress made that feeds into reports and dashboards accessible by senior leadership for high visibility into the work. It will call out any at-risk work for prompt response and will highlight milestones and deliverables progress, as well as upcoming work.

b. **Follow-up – How will that information be reported out publicly?**



Oregon
Tina Kotek, Governor



OREGON
DEPARTMENT OF
EDUCATION

Oregon achieves . . . together!

Dr. Charlene Williams
Director of the Department of Education

In December 2025, the Department will report back to the Legislature on progress toward meeting outcomes and milestones.

4. How are performance metrics for 3rd grade reading and 8th grade math measured?

The LGPTs for both 3rd grade English language arts (reading, writing, research, and listening) as well as 8th grade mathematics are currently measured by Oregon's state summative tests. **The bill adds interim assessments as another measure to determine growth over time and how students are progressing.**

5. How do tiny districts fit into the plan? When student numbers are very small, statistical measures lose relevance. For instance, in a 100-student district with one Native American student, the district might either show that 100% or 0% of Native American students met a particular measure, but that's not very useful data.

There are two processes that ODE has created to support our smallest grantees through the current SIA LPGT process: releasing the requirements for very small grantees, and creating a combined focal student group for targets. Because small student numbers have a lot more variation and are harder to demonstrate systemic change, ODE both released the smallest grantees with fewer than 80 ADMr, or students, and released grantees from setting targets for metrics in which they have fewer than 10 students in the denominator. Instead of setting targets for each focal student group (increasing the chances that there are too few students), ODE has also created a Combined Focal Student group of all students from historically marginalized student groups. This allows for the setting of targets for this larger, combined group. However, all grantees are required to review and provide narrative reflections on their progress for all of the common metrics.

Small districts are an integral part of the Department's broader plan, and we recognize the unique challenges they face, especially when student numbers are small, and statistical measures may lose relevance. **To address these challenges, the Department has an administrator who works directly with small school districts, bringing deep knowledge of their specific needs and circumstances.** This direct support ensures that small districts receive tailored assistance that is not solely reliant on standardized metrics.



Oregon
Tina Kotek, Governor



OREGON
DEPARTMENT OF
EDUCATION

Oregon achieves... together!

Dr. Charlene Williams
Director of the Department of Education

Recognizing that each district has distinct needs, the Department has structured its support through a regional approach, which allows for more localized, relevant support, ensuring that small districts benefit from the flexibility and responsiveness that is critical to their success.

6. How are the provisions of the bill supposed to apply to the JDEP program, where students are often only present for a few days at a time?

Juvenile Detention Education Programs (JDEP) serve a highly mobile population, with many students attending for only a few days. This presents challenges in applying standard measures such as academic proficiency and attendance tracking. **To address this, the bill now states the State Board shall develop differentiated performance growth targets for programs like JDEP, recognizing the differences they have with common school districts and public charters (see page 5, lines 12-15 of the -5 amendment).**

7. Definitions defined that will be measured are primarily determined by ODE rulemaking. How will we ensure these align with national definitions so comparisons with other states is possible and we are comparing apples to apples vs comparing only our districts to one another? Can we get definitions in statute so we know what will be compared prior to implementation vs defining during rule making?

Ensuring alignment with national definitions while maintaining the flexibility to meet Oregon's specific needs is a critical consideration in the development of performance measures. The Oregon Department of Education (ODE) recognizes the importance of ensuring that the definitions used for measurement align with national standards to allow for meaningful comparisons between states, rather than limiting comparisons to Oregon districts alone.

While many of the key definitions will be determined through rulemaking, the Department is committed to reviewing and integrating national definitions where appropriate to ensure consistency and comparability. Additionally, ODE will engage in a transparent process during rulemaking, seeking input from stakeholders, including national organizations, to align these definitions with broader educational standards.



Oregon
Tina Kotek, Governor



OREGON
DEPARTMENT OF
EDUCATION

Oregon achieves . . . together!

Dr. Charlene Williams
Director of the Department of Education

Regarding your request for definitions to be included in statute, there is often flexibility needed within rulemaking to ensure that definitions remain relevant and adaptable to changing educational landscapes. This approach will help ensure that the definitions used for comparison are both relevant to Oregon's needs and comparable to national standards, creating a reliable basis for data-driven decisions and cross-state comparisons.

8. Measuring of metrics is burdensome with so many categories and subcategories selected. Is it possible to streamline these so fewer exist to measure and choose for improvement, making success more likely for district implementation?

Districts have already worked with ODE to establish performance growth targets for the first five metrics referenced in the bill. These were developed in the Student Success Act (HB 3427, 2019).

The three additional metrics align with research-based practices and feedback from our partners. **These metrics were carefully selected to ensure that they accurately capture the factors that contribute to student achievement and district effectiveness. K-2 regular attendance is an indicator of future attendance in middle and high school; 8th grade math proficiency is the strongest predictor of high school math placement, high school graduation & 5-year completion; and the local option metrics will allow districts to focus on other key indicators, like social emotional health.**

School districts should be reviewing data for each focal group on a regular basis to determine if there are systemic gaps in support; however, to reduce burden, performance growth targets are set for a Combined Focal Student group. Instead of setting 18 targets per metric per year (one for each focal student group and two for all students), school districts set three.

The Department is committed to ensuring that the measurement process is both manageable and impactful.

9. How would districts or ODE determine the likelihood/evidence needed to move the metric and the time necessary to yield better outcomes as some things can change quicker than others. For example, later in the bill where coaching comes into play, how can districts and ODE ensure the



Oregon
Tina Kotek, Governor



OREGON
DEPARTMENT OF
EDUCATION

Oregon achieves . . . together!

Dr. Charlene Williams
Director of the Department of Education

coaching methods align with moving the metric selected by the district and that it is reasonable to expect improvement within the time frame required in the legislation?

The Department will rely on evidence-based practices and research on student learning as well as learning from past practice. **For example, the Office of Education Innovation and Improvement analyzed the top 10% of districts to define what ‘ambitious and attainable’ means in Oregon, providing a defensible framework for setting expectations.**

Some metrics will show progress more quickly than others, depending on the nature of the intervention and context. Coaching methods will be aligned with the specific metrics selected by districts, ensuring tailored support that directly impacts progress. Regular check-ins between ODE and districts will allow for adjustments to coaching strategies as needed, ensuring that improvement is realistic within the required time frame.

The Department will continue to evaluate the effectiveness of coaching and other supports, **gathering feedback from districts about the impact of interventions**, and using this input to refine strategies. This ongoing feedback loop will help ensure that interventions are responsive and effective, while encouraging districts to set achievable milestones based on evidence from high-performing districts.

10. Who defines and how is “safe and inclusive learning environments” that must be established in schools when coaching is required, as is improving the “skills” of member of the school board? Are there definitions for districts and how would they be involved in creating those definitions?

Safe and inclusive learning environments must feel that way for students, including the most vulnerable, as well as school staff and families. **ODE’s SEED and EVE Surveys and OHA’s Student Health Survey regularly collect data about how students and school employees experience their school environment and measure critical components of school culture and belonging.**

School district coaching will align national and state best and emerging practices with synthesis of district SEED, SHS and EVE data to identify what components of school safety and belonging are strong, and the greatest opportunities for enhancing safety and belonging for everyone who accesses schools. **By addressing this district by district, safety and belonging improvements**



can be understood as outcomes of staff and student experiences in school. ODE's Integrated Guidance offers qualitative information and a framework for community led planning to address opportunities and gaps in schools.

11. How is this list described in Sec 31 determined?

“(c) May require the school district or public charter school to adopt textbooks or other instructional materials from the list of textbooks and other instructional materials adopted by the State Board of Education under ORS 337.050 for early literacy; and “(d) May require the school district or public charter school to participate in school or school district training or improvement activities, as identified by the department.”

a. What is the role of parents in determining the list?

The role of parent involvement in instructional materials happens at the local level.

Chapter 337 of Oregon Revised Statute (ORS) states that local school boards shall involve parents and community members in their instructional materials adoption. Whether it be for materials that are on ODE's approved list, or materials that are independently adopted, parents and community members are encouraged to provide feedback in their school districts.

ODE's instructional materials review process includes evaluation of publisher-submitted materials by teams of trained educators who are knowledgeable of the grade level and subject area of materials to be reviewed. The Board delegates the Superintendent of Public Instruction the responsibility for appointment of such committees, and no fewer than three-fourths of the membership of each committee shall be classroom teachers currently employed in Oregon public schools (OAR 581-011-0066). The remaining committee members are typically Oregon K-12 administrators, Oregon higher education professionals, and other content experts with experience in K-12 instruction.

Materials are evaluated for alignment to Oregon K-12 content-area standards and the State Board of Education-approved adoption criteria for instructional materials.

Materials that meet the criteria and legal requirements for instructional materials are



recommended to the State Board of Education for adoption (inclusion in the adopted materials list).

- b. **How can the “list” be challenged by local elected school boards if they disagree with it or would like other options for materials?**

The recommended list of materials is shared with the State Board of Education for a first reading annually in September prior to being adopted in October. Public comment at a State Board of Education meeting is one way to provide feedback. Additionally, districts can choose to pursue an Independent Adoption to adopt materials that are not on the State Board approved list using the adoption criteria for the content area under consideration (OAR 581-022-2350) with general funds, but not Early Literacy funds.

If the state funds the instructional materials process (rather than depending on publisher fees), ODE will have authority to evaluate and recommend materials for adoption that have not been formally submitted by the publisher. This may increase the quantity and frequency of high-quality instructional materials evaluated per content area. If a district was interested in adopting materials that are not on ODE’s approved list, they could request for the program to be included in the next “maintenance and refinement year” or mid-cycle adoption.

Background: Sec 31-Amends ORS 327.837; adds language “May Require school districts/charter schools to adopt textbooks or other instruction materials from the “list” adopted by the state board of education under ORS 337.050 i.

- 12. Presently, according to ODE, 80% of their employees are working from home. Our k-12 teachers don’t have that luxury. Why can’t the employees working from home be utilized in active classrooms visitations to as certain needs and support necessary for implementation of the science of reading k-5?**

ODE staff are working closely with ESDs to expand capacity to develop systems that will provide the right technical assistance and professional learning aligned to the specific needs of various



parts of the state. Not all ODE staff have the deep expertise in early grade science of reading tenets, hence the need for stronger systems.

On a related note, the bill specifies that, to the greatest extent practicable, student success teams who are part of the intensive coaching program shall assist school districts in person and while on site at the school district.

13. Teacher preparation is vital to the success of new teachers acquiring and practicing the researched based skills if the science of reading. How is progress going in our university programs.

This is outside the scope of the Oregon Department of Education's work at this time. Several of our school districts partner with universities to support their educators in learning the science of reading. For example, Eastern Oregon University is working to train educators in the science of reading to improve literacy instruction and outcomes in Oregon.

Timelines

14. Given the timelines outlined in the bill for district improvement, what does the research say on the timeline for district continuous improvement?

Research on district continuous improvement generally indicates that meaningful change takes 3-5 years. The initial year is often focused on building capacity and setting up structures, while the second year focuses on full implementation and adjustments based on data. By year three, districts typically begin scaling successful practices. However, improvements, especially in high-need districts, may require more time to achieve lasting outcomes. **The three-year timeline in the bill is consistent with this research but should allow for flexibility as districts continue to adapt and improve over time.**

- a. **Follow-up** – Do these timelines for improvement and intervention outlined in the bill align with the research (which is 3-5 years)?

For example, the RAND Corporation and other education research organizations have found that it takes multiple years to implement changes in curriculum, teaching



Oregon
Tina Kotek, Governor



OREGON
DEPARTMENT OF
EDUCATION

Oregon achieves . . . together!

Dr. Charlene Williams
Director of the Department of Education

practices, and leadership structures in a way that leads to meaningful improvements in student outcomes. Additionally, Marguerite Roza's research on funding and resource allocation suggests that systems change requires time to ensure that resources are effectively utilized and practices are embedded into the culture of schools and districts.

15. There is a short on ramp for implementation, and this be phased in so some metric measurement starts next year, like k-12 attendance and add more over a course of five years so districts can build on success rather than be overwhelmed with attempting to do everything at once and measuring continued failures because they can fix all metrics at once?

Districts are already familiar with setting targets for key areas like regular attendance, third-grade reading, ninth-grade on-track, four-year graduation, and five-year completion. The -5 amendment (Section 4) clarifies that these metrics will apply to the 2025-26 school year, while the new metrics will first apply to the 2026-27 school year (page 6, lines 4-15).

16. Under the proposed legislation, my understanding is that districts must participate in the intensive programs if they do not meet their performance growth target for three years. Then, districts would have one year of participation in the intensive coaching programs to meet their growth targets before being elevated to intensive coaching with the possibility of allocation and a portion of a district state school fund allocation. Based on the research, is that enough time for a district to improve?

While the Intensive Program focuses on building systems capacity through support from Stewards and ODE staff, ensuring that change can continue beyond the program. More time may be needed for some districts to achieve lasting improvements, but ODE is committed to working collaboratively with all districts to boost student outcomes.

Interim Assessments

17. What is the intent of requiring interim assessments? Is this just a best practice that ODE thinks all districts should adopt?



Oregon
Tina Kotek, Governor



OREGON
DEPARTMENT OF
EDUCATION

Oregon achieves... together!

Dr. Charlene Williams
Director of the Department of Education

Interim assessments provide valuable insights into student progress, helping educators identify areas of strength and areas needing improvement. They allow for timely adjustments in teaching strategies, ensuring that students stay on track to meet their learning goals. Most districts already use interim assessments, and the intent is to ensure interim assessments are aligned to Oregon's academic content standards by vetting a list of approved assessments.

When Governor Kotek convened education partners to discuss accountability, there was a clear need expressed for school-year data that is both responsive and impactful for students/teachers. The intent is to ensure that assessments are purposeful and support continuous improvement with just in time data.

18. What subjects will the interim assessments cover, and is that part of the bill?

School districts and public charter schools shall administer interim assessments in mathematics and language arts to measure student academic growth during the school year.

19. Assessments such as iReady or MAP were mentioned as examples of interim assessments. Those are really only K-8 assessments. Does the interim assessment statute apply to high schools? If so, what assessment is suitable?

Currently, in the -5 amendment, the interim assessments would only apply to K-8. The Governor's Office will clarify this on the record during Wednesday's work session.

ODE will need to develop technical criteria that must be met for an interim assessment to be included in the suite of choices for districts. These criteria could include addressing K-12 coverage, though that would not be the only consideration.

Oregon's current interim assessment system provides resources that are aligned with Oregon's state standards and fully accessible to educators and students in Grades 3-8 and at the high school level for English Language Arts (ELA) and mathematics, as well as in Grades 5, 8, and 11 for science.

Coaching/Stewards/Success Teams



Oregon
Tina Kotek, Governor



OREGON
DEPARTMENT OF
EDUCATION

Oregon achieves . . . together!

Dr. Charlene Williams
Director of the Department of Education

20. When stewards intervene in a board adopted budget, will they have to follow settled contracts?

Yes, all decision-making by the Student Success Team will align with board policies and settled contracts. This ensures that any actions taken by the team are consistent with the existing agreements and obligations already established by the district. By adhering to these policies and contracts, the Student Success Team can support the district's goals while maintaining compliance with contractual and policy frameworks that have already been approved by the board.

21. Will stewards have district-wide budget experience? The current bill only specifies "kindergarten through grade 12 education, community organizing or systems changes through continuous improvement".

Individuals currently serving in the Leadership Steward role bring significant expertise in the area of school financing. **The -3 and -4 amendments to the bill (now incorporated into the -5) further clarify that Stewards will be required to have experience in school financing, ensuring they are equipped with the necessary skills and knowledge to make informed decisions regarding the financial aspects of the district.** This experience will be essential as Stewards help guide continuous improvement efforts and support the effective allocation of resources across the district.

22. Section 8, subsection 3 allows for a person with experience in community organizing to lead a student success team. How does experience in community organizing qualify a person to lead change in a school district? How can you guarantee this person will have the knowledge of education law and public budgets that is required?

This language has been changed in the -3 amendment (now incorporated into the -5) to focus on community engagement with the intent that the person serving in this role will have experience building stronger connections between schools, families, and the larger community.

24. What if the school board and/or community disagrees with a steward-revised budget?



Oregon
Tina Kotek, Governor



OREGON
DEPARTMENT OF
EDUCATION

Oregon achieves . . . together!

Dr. Charlene Williams
Director of the Department of Education

The goal is for the Student Success Team, which includes Stewards as well as district staff (such as the Superintendent, School Board members, Community Representatives, and Teacher Leaders), to collaborate in developing a budget that addresses the district's identified needs. This approach ensures that the budget is shaped through a collective effort, rather than being developed in isolation by Stewards or ODE alone.

In line with the findings from the AIR report on the Quality Education Model and Edunomics research, it is crucial that any increased funding is directed toward evidence-based, research-backed, and promising practices. This means ensuring that resources are allocated to strategies that have been proven to drive positive outcomes over time. The use of data collected over several years will guide these decisions, reinforcing the importance of not only funding, but how funding is utilized. **Ultimately, funding matters, but how that funding is applied toward best practices is what truly drives sustained success in improving student outcomes.**

25. How will Sec 5 relating to the review and determination of success by ODE impact local governance held by School District Boards and community engagement in the budget committee work if ODE directs how district funds are used when coaching is required?

The goal is for the Student Success Team, which includes Stewards as well as district staff (such as the Superintendent, School Board members, Community Representatives, and Teacher Leaders), to collaborate in developing a budget that addresses the district's identified needs. This approach ensures that the budget is shaped through a collective effort, rather than being developed in isolation by Stewards or ODE alone.

26. How would funds spent on coaching and timing for determining coaching is required impact the school budget process & timeline?

By building coaching into the district's improvement framework, the goal is to provide targeted support while ensuring that the financial and operational aspects of the district are carefully considered in the budgeting process.



Oregon

Tina Kotek, Governor



OREGON
DEPARTMENT OF
EDUCATION

Oregon achieves . . . together!

Dr. Charlene Williams

Director of the Department of Education

Currently, customized coaching in various focus areas is available at no cost to districts. If a district is directed to participate in coaching due to not meeting performance growth targets for two consecutive years, there will be no direct cost incurred by the district for the coaching services themselves.

However, if the district is required to participate in the Intensive Coaching Program, it may impact the overall school budget and timeline on the basis of budgetary recommendations put forth by the Student Success Team, based on the unique needs of the district. While the coaching itself would not incur additional expenses, the district may need to adjust other budget priorities to accommodate the time and effort required for successful implementation.

If a district is determined to have not met their growth targets for the third year, they will be aware of this the winter prior to being required to participate in the Intensive Coaching Program. This would give districts sufficient time to plan to ensure that the necessary resources are in place for coaching and implementation.