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Date: March 10, 2025  
To: House Education Committee  
From: Parasa Chanramy  
Subject: COSA Testimony on [House Bill 2009](#)

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Good Afternoon, Chair Neron, Vice Chairs Dobson and McIntire, and Members of the House Education Committee:

For the record, my name is Parasa Chanramy, with the Coalition of Oregon School Administrators.

We want to thank Governor Kotek, her team, the Oregon Department of Education (ODE), and all of the educators, education partners, and advocates who have participated in this process – through both the [HB 2656 workgroup](#) and this process with the Governor’s team – to review and make recommendations to revise our accountability system.

Our organization represents superintendents, central office administrators, and school principals – we recognize the weight of the roles and responsibilities our members hold to ensure the success of each and every student in Oregon, regardless of zip code.

**Accountability is critical. We are all committed to seeing our students reach their full potential and thrive. As education leaders, we are all in for shared accountability for the right things, and with meaningful and effective support in place.**

Throughout this process, we have been grateful to be at the table, and will continue to stay at this table. As we further engage in this discussion in both chambers, we want to reinforce how critical ODE’s role is in leading the accountability system, crucially in two areas: 1) ODE’s internal capacity and ability to provide coaching and support for districts; and 2) grant consolidation, reduced reporting, and systems alignment.

**There must be clear timetables and deliverables for these administrative actions as we make revisions to our accountability system and phase in new changes.**

We believe that as we make revisions to our accountability system, the State must ensure that ODE has the internal capacity and alignment to provide high-quality, consistent, and timely support to districts. Without a fully built out system of supports – across ODE and regional partners – this approach risks holding districts accountable without equipping them with the tools to succeed.

We have extensive feedback on the -1 amendment. In our written testimony, we outlined our areas of support, areas of concern, recommendations, and key questions.



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### **Performance Growth Metrics, Supports, and Interventions (Sections 1-16)**

**Coaching and Intensive Program.** For coaching and intensive program efforts to be effective, we must consider these key factors:

- ODE's current capacity, skills, and experience to be able to effectively support districts through coaching and the intensive program, and how many districts they can support with on-site support with highly skilled and experienced coaches
- Capacity, skills, and experience of regional education system partners
- Level of focus and alignment of our current system
- Sustainable funding for improvement efforts

Continuous improvement work is based on the principles that making sustainable change takes time and involves collective effort; is context specific; and requires constant adaptation, data collection, and learning (Bessant & Caffyn, 1997; Bhuiyan & Baghel, 2005; Langley, Moen, Nolan, Nolan, & Norman, 2009). In accountability conversations, there's often a lot of talk of interventions, but not enough discussion on the infrastructure of support for districts. With that, we must ensure that there are sustained investments in ODE and our regional education system partners so that they can do their best work across our system to support districts.

**High Quality Support and Coaching on the Ground.** ODE and regional education system partners need to be able to recruit, hire, and retain coaches and experts who have a track record of success in district and school turnaround, and who have expertise in high-quality instructional practices and leadership, human resources, district budgeting and local budget laws, board governance, and labor and management relations. Coaches and experts need to be highly skilled and experienced; they must also be able to foster trust with school districts, and provide support on the ground. ODE's delivery of high-quality, timely, and coordinated support to districts is a critical foundation to our accountability system.

**Clarity on Entry/Exit from Intervention.** On a more technical note – it is unclear how many “missed” targets would require entry into the coaching process, the intensive program or directed spending. It is also unclear what the “exit” measures would be to exit from the coaching process, intensive program, or directed spending. From a methodological perspective, it will also be important to consider how some of the metrics are highly correlated and not discrete, and the impact that has on skewing entry and exit from support/intervention.

Without clarity on entry and exit criteria, districts could be trapped in indefinite intervention without knowing how to improve or when they've succeeded – which risks undermining the sustainability and stability of improvement work. Clear, research-based entry and exit criteria are essential for trust and effectiveness.

**System Alignment.** Internally and externally, ODE and regional education system partners (for example, Education Service Districts and Regional Educator Networks) need to be in alignment



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with one another and working at a systems level (not siloed at the program level) as they provide support for school districts.

For example, for accountability to work well, we need to ensure that ODE is aligned and coordinated at all levels. Currently, the majority of ODE's work is administered at the program level with very little internal coordination across the agency. When decisions are made at the program level among different departments within ODE, there are many times where districts receive duplicative requests for data and reports that have already been submitted to ODE, and conflicting guidance on how grants are to be administered. Without aligned internal systems at ODE, districts will continue to receive duplicative requests and conflicting guidance from different ODE offices, undermining their ability to meet targets.

Along with ODE, we need to make sure that ESDs and RENs are also aligned in providing support, and operating towards the same goals and targets established by districts so we're all rowing in the same direction. We believe that having a common framework for improvement and feedback loops will further support alignment across state and regional education system partners when providing coaching and intensive supports.

**Simplify, Streamline, and Differentiate.** As a state, we need to continue to simplify and streamline our grant programs, requirements, and reporting and focus on what needs to be in place to support continuous improvement. The majority of our school districts are small and medium-sized, where our leaders are wearing multiple hats. Many of our leaders continue to note that the volume of requirements and reporting is overwhelming and it draws precious time away from the work we need to do to support improving outcomes for students. The supports that ODE and regional education system partners provide must also be meaningfully coordinated and differentiated so that districts can continue to do their best work in support of students.

**Recommendations:**

- Increase and sustain state investment in our state and regional infrastructure of support for districts.
- Ensure that high-quality supports for districts i) are aligned at the system level using a common framework for improvement, and ii) differentiated at the local level. And that there are feedback loops in place to support continuous improvement.
- Continue to simplify and streamline state grants, requirements, and reporting so that districts can focus on continuous improvement and improving student outcomes.
- Include language that requires ODE and State Board of Education to develop clear measures for entry into – and exiting from – directed coaching, intensive program, and directed spending, in consultation with school districts.

**Directed spending.** While we are supportive of the directed spending of the Student Investment Account allocation for districts needing the highest level of intervention, we still have major concerns around the state directing up to 25% of a school district's State School Fund Allocation



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without clear guardrails on how that funding might be directed and a plan to ensure that ODE has highly skilled coaches and experts that understand district finance and know Oregon budget laws.

It is also unclear what the potential legal interaction between directed spending and collective bargaining agreements will be. Across Oregon districts, 80-90% of State School Fund dollars are budgeted to educators and staff and 95%+ of our educators and staff are covered by collective bargaining agreements. This raises three important questions.

- If successor bargaining cycles cannot be modified to fit the progressive intervention timeline, how will directed spending work?
- By law, local school boards and labor unions are the only parties to the contract, excluding ODE's formal role in directed spending. With that in mind, how will directed spending work?
- Does ODE have the statutory authority to amend collective bargaining agreements for the purposes of intervention?

Lastly, our members have also expressed concerns around how the directed spending might potentially redirect dollars away from programs that keep students engaged in and out of school (for example, career and technical education programs and robotics programs that are important to students and local communities). With that, for any redirection of a portion of State School Funds, it will be important to consider the tradeoffs.

**Recommendations:**

- Prioritize directing spending for the Student Investment Allocation first.
- Develop clear guardrails in this bill that will inform how ODE may direct up to 25% of a district's State School Fund Allocation. For example, at a minimum, the planning and timing of when the portion of SSF funds are directed should be in compliance with local budget law; and require ODE to present their proposal to the district's local school board and community.
- Ensure that there are highly skilled coaches and experts that understand district budgeting and know local budget laws at the table when discussing the redirection of spending.
- Continue to consider potential impacts on current collective bargaining agreements.

**K-2 attendance and eighth grade math proficiency.** We are supportive of including both of these metrics to the current list of five common metrics (regular attendance, third grade reading proficiency, ninth grade on track, four year graduation rates, and five-year completer rates).

**Summative assessment.** As we consider adding new measures, in addition to the current measures districts are held accountable for right now, we want to reinforce how important the measurement of student progress and proficiency is within our accountability system.



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Specifically, with the potential inclusion of the eighth grade math proficiency metric, in addition to third grade reading proficiency – that would mean that two measures rely on results from the current summative assessment (Smarter Balanced).

Our members continue to share their concerns around our current statewide summative assessment, along with the unintended impacts of our current opt-out law in Oregon on our accountability system. Here are the common feedback themes our members shared with us.

- The Smarter Balanced summative assessment is completed once a year and takes districts up to two weeks to administer. Students experience testing fatigue and anxiety, and the loss of learning time.
- Holding districts accountable for test results when we have a statewide opt-out law is challenging, especially given assessment participation, and the higher levels of opt-out in middle and high school (for the eighth grade math assessment, only 87% of students participated in the assessment in 2024 – 8 percentage points lower than the 95% threshold needed for a reliable set of data). Without a serious review of our opt-out law, Oregon is grading our schools with incomplete information.
- Results from the summative assessment aren't available until the following fall - which is too late for planning and making system adjustments. We want timely and actionable data and feedback to inform our continuous improvement work.
- Since the summative assessment is only completed once a year – it is a snapshot in time – the assessment results don't show student growth over time. And for districts who serve many students who are multilingual learners, the current summative assessment isn't offered in other languages.
- In the past, the Smarter Balanced summative assessment was utilized as a component of teacher evaluations – which is an example of a misuse of the summative assessment. When that happened, there was a heightened level of distrust of the Smarter Balanced test – and we still have not been able to recover from that time.

### **Recommendations:**

- Explore updating our current summative assessment, and adding options for summative assessments in other languages.
- Reduce the length of the summative assessment, and ensure that districts receive their assessment results before the end of the year.
- Increase support for assessment literacy and high-quality assessment practices.
- Require ODE to take into consideration a district's interim assessment data, as well as assessments in other languages as evidence of growth and/or proficiency demonstrated by students within multilingual communities, as part of progress monitoring for district's receiving coaching, or part of the intensive program.
- Require ODE to report assessment participation information next to district performance targets that are tied to assessment.
- Require a review of the impact and unintended impact of Oregon's opt-out law.



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**Local Metric Rate.** We have concerns around the current definition and parameters regarding the local metric rate. We find the current definition and parameters in the -1 amendment to be limiting, especially because it seems to exclude student opportunity and access, and other qualitative measures that are important to a student's engagement and success in school (for example, CTE access and participation, dual credit access and participation, connection to school athletics and activities, student survey data on engagement and well-being, etc).

Additionally, the parameters where the state would approve only three local metrics; and districts can choose one of those metrics seems overly restrictive, especially, given the original intent and spirit of the local optional metric when it was first developed within the Student Success Act.

**Recommendations:**

- Keep the local metrics optional (meaning that districts can choose to include a local metric) with no limit on the number of metrics on a recommended list that districts can choose from.
- Require ODE to develop a recommended list for local optional metrics. In developing the list for local option metrics, we support creating a technical advisory group that includes educators from schools, districts, and ESDs, as well as other education system partners, to help inform the development of the list.

**Statewide Performance Targets.** We are generally supportive of statewide performance targets in developing a clear set of goals for the state. With that being said, we have a number of questions around the process and the role of the local metric rate.

- What will be ODE's process for developing these goals before they are adopted by the State Board of Education? Who will be involved in that process?
- How will new targets align with existing targets under [Every Student Succeeds Act](#)?
- How will ODE and other related state bodies be held accountable for, and supported, in meeting these statewide goals? Will those goals be realistic and achievable?
- How will the statewide targets shape the metric targets set for school districts? Will those goals be realistic and achievable?
- Setting state goals around the local metric rate raises some concerns given our feedback on the limiting definition and parameters of the local metric. What will that mean for local metrics that are focused on student access and opportunity, and measures that are qualitative?

**District Performance Targets.** We are generally supportive of district performance targets in developing a clear set of goals for school districts. With that being said, we have a number of questions around the process, especially given the broad definition of school districts in the -1 amendment which includes a common school district or union high school district; an education service district; a public charter school; an approved recovery school; Youth Corrections Education Program; or Juvenile Detention Education Programs (see page 2 lines 22-28 in the



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amendment).

- What will be taken into consideration when defining goals for similar school districts? For example, will the number of students / youth served and demographics; needs of students and youth; funding levels (and whether districts have local option levies); types of entities and how they are structured (especially given the broad definition) be factored in?
- What differentiation in ODE supports will be in place for school districts, ESDs, public charter schools, approved recovery schools, and YCEP and JDEP programs?
- What will the consultative process look like for these various entities that fall under the broad definition of school district?
- What is the time horizon for performance targets? Annually? Over a period of time? Studies of comprehensive school reform suggest that implementation for at least three to five years is typically the time necessary to see student achievement improve (Aladjem et al., 2006; Borman et al., 2003; Desimone, 2000; Zhang et al., 2006).
- What will progress monitoring look like? How will student and youth needs be taken into consideration and growth over time?

As the ODE sets statewide goals, and supports school districts with setting performance targets, we want to make sure that those targets are also informed by the research on realistic and achievable rates of improvement.

### **Interim Assessments (Sections 29 -30)**

In general, we are supportive of the inclusion of interim assessments. Interim assessments are important assessments that districts utilize throughout the year to track student growth. These assessments yield actionable data that helps inform instructional practices, as well as continuous improvement at the school and district level.

In our read of the amendment, connecting the interim assessment system to our current statewide assessment system (Smarter Balanced) would be problematic because of the reasons we have articulated on page 2 of our written testimony regarding our current summative assessment. We also have concerns around requiring districts to adopt a brand new interim assessment system as we make revisions to our accountability system.

With that being said, we recommend that the language in the -1 be amended so that districts can use their current interim assessment system as long as the system is aligned to the standards and a nationally-normed assessment. If they do not have an interim assessment in place, we would support additional funding to help districts in acquiring an interim assessment that best meets their students' needs.

Lastly, we support language in the -1 amendment that would require districts to review their interim assessment data at least twice a year with their school level administrators, and at least annually with their school boards during a public meeting.



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**Recommendations:**

- Allow districts to use their current interim assessment system as long as the system is aligned to the standards and a nationally-normed assessment.
- For districts that do not have an interim assessment in place, provide additional funding to help districts in acquiring an interim assessment that best meets their students' needs.

**Early Literacy Curricula Standards and Training (Section 31 and 32)**

We support repealing the publisher's fee in ORS 337.065. For these different requirements around textbooks, instructional materials, training, and improvement activities related to early literacy, a few key questions emerge for our members:

- Will the State Board list include a comprehensive list of textbooks and instructional materials in multiple languages?
- Will the state support districts in purchasing textbooks and instructional materials (for printed materials and online subscriptions)? Or, help with significantly reducing the costs of textbooks and instructional materials, and online access to those materials?
- For the school and district improvement activities:
  - Will the timing of the requirement be in alignment with our planning around Integrated Programs?
  - Will ODE provide funding for the training and improvement activities (for example, covering the cost of substitute teachers)?
  - Will there be alignment and support from ESDs and Regional Educator Networks?

**Reduction of Redundancies (Section 33 and 34)**

We support these efforts to reduce redundancies in reporting (currently, there are over 320 data collections and other required submissions annually) and believe that this work should happen on a faster timeline to provide districts with some relief so that they can do their best work in support of students. We would also advocate for more efforts to pause or extend the runway for new initiatives, consolidate and streamline other grant programs and requirements (currently, there are over 130 grant programs), so that districts can focus on high-quality implementation.

**Division 22 and 24 Standards (Section 35 and 36)**

We support these efforts to review the Division 22 and 24 standards so that they are more focused and aligned with our shared state goals for improving student outcomes. We believe that this review can be done internally, through administrative actions by ODE.

The -1 amendment also appears to create a new process for complaints regarding noncompliance with a standard. Since there is already [a complaint process in place](#), we would recommend a review of our current complaint process before creating a new system and requirements.





**Closing**

Thank you again for the opportunity to testify and share our feedback today. We look forward to our continued work together to advance the administrative actions, and make revisions that help strengthen our accountability system with clear goals and meaningful support systems in place so that districts can continue to do their best work in supporting the success of each and every student in Oregon.