

Grant Consolidation Report

Report to the Oregon Legislature

January 2022

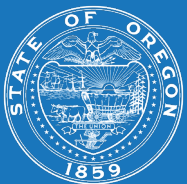


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I. Executive Summary

The Oregon Department of Education (ODE) Grant Consolidation Report outlines complexities with Oregon's K-12 education grant-in-aid (GIA) portfolio and provides a path forward for both ODE and the Oregon Legislature (the Legislature) through a set of recommendations for improved policies, practices, and systems. Significant legislative shifts in the GIA portfolio have taken hold in the past decade, which have caused challenges for school districts and other grantees. To better understand those challenges, ODE conducted an analysis, including engagements with education partners, and developed a set of recommendations to address them.

This report outlines the findings and recommendations for the Legislature in response to the 2019 budget note in House Bill 5015¹. Specifically, the budget note requires ODE to study the various K-12 Grant-in-Aid programs to determine if further programs can be combined with other programs or eliminated. As such, ODE reviewed the federal and state grant portfolio and determined the following:

- Consolidation and elimination of grant programs remains an important consideration for reducing redundancies within the grant portfolio, and it will be a critical and on-going step in the agency budget request process. (See recommendation 1 on page 7.)
- Large-scale consolidation and elimination of grant programs may pose significant policy challenges.
 - Limited authority to consolidate federal programs.
 - Individual state grant programs are created to address a specific concern or goal and thus often have strong support within communities and the Legislature.
- While major barriers exist for comprehensive consolidation or elimination of grants, we found that optimizing and integrating grant processes (i.e., communications, requirements, data collection, reporting, applications, and modernizing tools) will reduce administrative burden across the various grant programs for all grant recipients, including school districts.
- By including this alignment process in ODE's legislative concept and bill analysis structure, we can ensure that new grant programs are integrated into the existing grant portfolio without unnecessarily increasing administrative burden on school districts. (See recommendations 1 & 2 on page 7.)

With a collective GIA portfolio that represents approximately \$4.8 billion per biennium in combined investments in Oregon's K-12 education, ODE is committed to equity-centered improvements aligned to the ODE Equity Strategic Plan that foster educational equity and anti-racism. This effort is aimed at reducing the grant administration burden for our grantees and collectively improving student investment opportunities and outcomes, with focused attention on students and communities that have been marginalized and oppressed by educational systems not designed for them.

The Shifting Grant-in-aid (GIA) Portfolio

ODE's GIA portfolio has changed in the last decade with significant increases in education funding allocated through grants in order to better respond to and prioritize community voice and high leverage investments with increased accountability. In the 2011-2013 legislative session, state-funded strategic investments for grant-in-aid increased ODE's grant portfolio. Portfolio growth has continued with each successive session since then. Currently, ODE's GIA portfolio is about 30% federal funds and 70% state general funds and other funds. This distribution is substantially different from 2011 when ODE administered a GIA portfolio that was primarily

¹ Budget note in House Bill 5015: The Oregon Department of Education is instructed to study the various K-12 Grant-in-Aid programs to determine if further programs can be combined with other programs or eliminated. The Department is to identify any barriers or required statutory changes in its study. Groups representing the various K-12 interest groups should be consulted in this effort. The Department is to submit a preliminary report to the Interim Ways and Means Committee by February 1, 2020 with a final report as part of their Ways and Means presentation to the 2021 legislative session. (Note: report and presentation dates were extended due to the pandemic.)

federal grants (66%). Simultaneously, there was a shift from predominantly competitive grants to grants distributed with a formula allocation in order to more equitably distribute grant dollars to smaller or resource-constrained districts.

In addition to a shifting grant portfolio, in 2013, ODE gained two new partner agencies, Youth Development Division (YDD) and Early Learning Division (ELD), which brought unique grants and grantees. In 2014, the federal government modified regulations for federal grants to reduce administrative burden and the risk of waste, fraud, and abuse while delivering better performance outcomes².

In 2003, ODE had 34 grants, increasing to 54 grants in 2011, then 94 grants by 2020, and to 108 grants by September 2021.

Recommendations

ODE remains committed to centering equity in the design and implementation of the recommendations while also building practices and systems that go beyond compliance to foster collaboration, stewardship, customer service, relationships, and technical assistance.

Recommendations:

1. Provide Guidance for the Legislature to Align and Develop Policy for Grant Consolidation and New Grant Programs
2. Legislature Aligns Policies to Support Grant Consolidation and New Grant Programs
3. Consolidate and Integrate District Grant Applications
4. Streamline ODE Grant Practices and Processes
5. Improve ODE Technical Systems for Grant Management and Reporting
6. Improve Access to Grant Information and Support
7. Align Grant Requirements, Standards, and Practices for Community Engagement



The recommendations outlined in this report:

- Reflect ODE’s continued shift from a compliance-based approach towards a high-quality service model to grantees to improve responsiveness, clarity, compassion, and supported accountability.
- Address improvements to grant policy, practices, and systems to create coherent, streamlined, well-supported, and high-quality grant applications and data collections.
- Represent clear themes and areas for improvement that have consistently surfaced in ODE’s grant consolidation analysis.
- Have been vetted by ODE leadership, ODE grant managers, and a representative group of statewide partner districts and K-12 education leaders (i.e., Coalition of Oregon School Administrators (COSA), Oregon Association of School Business Officials, Oregon Small Schools Association, Hillsboro School

² Per the [US Department of Education](#), in 2013, OMB partnered with the Council on Financial Assistance Reform (COFAR) to revise and streamline guidance to develop the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) located in title 2 of the Code of Federal Regulations (2 CFR part 200) (79 FR 78589; December 26, 2013). The intent of this effort was to simultaneously reduce administrative burden and the risk of waste, fraud, and abuse while delivering better performance on behalf of the American people. Implementation of the Uniform Guidance became effective on December 26, 2014 (79 FR 75867, December 19, 2014) and must be reviewed every five years in accordance with 2 CFR 200.109.

District, North Clackamas School District, Baker School District, Coquille School District, Umatilla School District, and Lake County School District).

II. Key Updates & Findings

ODE organized the grant consolidation process into three phases.

Phase 1 focused on gathering and analyzing detailed current state grant information.

Phase 2 focused on developing recommendations and the report to the Legislature.

Phase 3 will finish implementing improvements and recommendations upon approval by the Legislature, where applicable.

Phase 1: Information Gathering (May 2021 - August 2021)

During the information gathering phase, ODE:

- ✓ Collected and reviewed a detailed summary of each of the grants;
- ✓ Conducted district focus groups with small, medium, and large enrollment school districts (i.e., Hillsboro, North Clackamas, Baker, Coquille, Lake County, Umatilla, and Nyssa) to listen and learn about how to improve the grant process; and
- ✓ Collected the Grant Process Questionnaire from ODE grant managers with information on grant applications, data collections, processes, and recommendations.

Summary of Findings from Phase 1, Information Gathering

In phase 1 of the Grant Consolidation process, ODE collected and analyzed a range of grant information, such as grantees, funding levels, funding sources, grant manager surveys, education partner experiences, and other relevant information. The analysis largely validated and reinforced findings from the initial analysis shared with the Legislature in December 2019, while also providing deeper insights. Themes from the analysis that informed the recommendations in this report include:

- Challenges and hurdles stem from a range of issues related to policies/statutes, human capacity, technical systems, and practices.
- Grant applications and data collection practices and systems were designed for compliance and do not consistently support customers through responsive, coherent, and efficient practices. While federal grants, in particular, are more compliance-focused with several regulations and audits that occur, there is still more to be done through service and innovation to improve the granting process.
- Formal shifts in agency alignment and major funding and operating structures create compounding factors for absorbing, transitioning, and aligning grant programs. (For example, both YDD and ELD joined ODE in 2013, which significantly broadened the scope of ODE's customer base. ELD is now transitioning back to an independent agency by 2023, which will result in further shifts.)

Key GIA Metrics

ODE currently administers 108 state and federal grant programs. The grants are managed across four agencies (ODE, YDD, ELD, and EAC), by 70 grant managers. Approximately 40% of ODE's grant managers have fewer than three years in their roles. For the purposes of this report, the Grant Consolidation project scope includes active ODE grants and, at YDD's request, also includes the YDD grants. The two agencies have 98 of the 108 total grant programs. (The project scope excludes Early Learning Division (ELD) and Educator Advancement Council (EAC) grants as well as inactive, or unfunded, ODE grants.)

Grantees include school districts, ESDs, and other entities, depending on eligibility requirements. Many grants have more than one type of recipient, as is reflected in the metrics below.

- 2021-23 District Grantees: Sixty-one (61) grants are currently distributed to one or more of the 190+ school districts of which 26 require engagement and 33 require a plan.
- 2021-23 ESD Grantees: Twenty-nine (29) grants are currently distributed to one or more ESDs, of which 20 require community engagement and 19 require a plan.
- 2021-23 Other Grantees: Forty (40) grants are currently distributed to qualifying other grantees.
 - 10 Grants for Non-Profit/Community-Based Organizations (CBOs)
 - 10 Grants for Cities/Counties
 - 7 Grants for Post-Secondary
 - 6 Grants for Oregon Tribes
 - 4 Grants for YCEP/JDEP
 - 2 Grants for Early Learning Providers
 - 1 Grant for IAA with Other Agency

Qualitative Information

In phase 1, ODE also collected qualitative data from ODE grant managers and through focus groups with small, medium, and large enrollment school districts. The qualitative data collection considered current grant applications, operations, training, data collections, and data systems that support grant reporting. It also provided deeper insight into the grant requirements and burdens the districts and other grantees face in meeting those requirements. Their feedback and insights helped generate and refine many of the recommendations in this report.

Districts expressed growing frustration and concern with the time, resources, and duplicative efforts necessary to apply for, track, and report on grant activities. They also expressed gratitude for engaging on this topic and offered several suggestions for improvement.

The ODE grant managers were able to provide more detailed insights around practices, policy constraints, and system hurdles that must be addressed for improvement.

Phase 2: Developing Recommendations & Legislative Report (September 2021 to February 2022)

- ✓ Developed the Internal Grant Consolidation Report.
- ✓ ODE leadership and ODE staff provided feedback on the Internal Grant Consolidation Report.
- ✓ Incorporated revisions into an external report for partner feedback.
- ✓ Consulted with partner district leaders through sessions coordinated by COSA and OASBO. Sessions included discussions with Hillsboro, North Clackamas, Baker, Coquille, Lake County, and Umatilla.
- ✓ Incorporated revisions into Final Legislative Report.
- ✓ Sent Final Report to Legislature.

In phase 2, ODE consolidated the information into an internal report and conducted a series of internal and external review and feedback sessions to verify the phase 1 findings and refine the recommendations. ODE leadership, grants managers, and education partners provided consistently strong support for the recommendations outlined in this report for the Legislature.

Phase 3: Finish Implementing Improvements & Recommendations (After February 2022)

- ❑ Implement Goals & Recommendations from the Final Report upon Legislative approval, where applicable.

While the full scope of the implementation in response to the 2019 Budget Note will not begin until phase three, it is important to note that ODE has efforts already underway to consolidate grants and align processes, where it has the authority to do so or can do so through operational alignment without needed changes in statute. The current ODE efforts are in direct response to grantees’ immediate needs and also reflect learning through the Grant Consolidation process. Work completed or underway includes:

- Governor Kate Brown recommended and the 2021 Legislature eliminated three grant programs: Regional Promise, Accelerated College Credit Instructor Program, and For Inspiration and Recognition of Science and Technology (FIRST).
- The Office of Education Innovation and Improvement (OEII) is aligning processes and building an integrated application for the Continuous Improvement Plan (CIP) plus five state grant programs (High School Success (HSS), Student Investment Account (SIA), Early Intervention Indicator System (EIS), Every Day Matters (EDM), and Career and Technical Education - Perkins V (CTE).
- ODE’s Office of Finance and Information Technology (OFIT) implemented a new electronic submission, approval, and tracking process. The electronic tracking process includes new methods for prioritizing reimbursements, such as payments to smaller community-based grantees.
- The Governor’s Office has approved limited-term funding through the Governor’s Emergency Education Relief (GEER) fund for one position at ODE as well as resources for ESDs to provide differentiated grant management supports to small districts.
- ODE is in the initial stages of procuring a new grant management system to modernize our grant management infrastructure and reporting tools.

Spotlight

The six programs being integrated by OEII represent over \$1 billion in investments every biennium, which is approximately 25% of the total GIA portfolio. Work underway to reduce the districts’ grant administration burden while preserving the original intent of the grant programs include:

- Integrated monthly communication launched December 2021
 - Consolidates multiple communications from programs
 - Provides updates on key due dates and deadlines
- Actively developing guidance to be released in February 2022
 - Provide district with requirements and expectations for an integrated application process for 2023-25
 - Allows a year for districts to plan and engage community prior to the application submission
- Working towards significant efficiencies in reporting

III. Outcomes

The core and overarching outcome of the grant consolidation work is to create conditions for educational equity and strengthen systems that improve outcomes for students. Outcomes that support this overarching aim include the following.

- Center equity and use an equity lens to shape and improve protocols, practices, and programs. Ensure equity-focused and streamlined requirements across state grants and, to the extent possible, federal grants.
- Improve legislative design and guidelines to establish new grant programs and align or consolidate current ones.
- Reduce districts' administrative burden for managing the grant application and reporting processes.
- Provide well-trained and supported grant managers who consistently deliver high-quality service to districts, especially small districts.
- Modernize the technology and systems for grant applications and reporting.
- Improve practices and tools for data analysis to more effectively monitor progress and support student investments.

IV. Recommendations

As outlined above, ODE developed the following recommendations through a comprehensive process of analysis, review, and refinement. These final recommendations received strong and consistent support from education partners as well as ODE staff and leadership. For the purposes of this report, we've organized them into two sections: (A) Recommendations Related to Policy and (B) Recommendations Related to People, Systems, and Practice. The recommendations in part A will require partnership with the Legislature.

A. Recommendations Related to Policy

1. ODE to Provide Guidance for the Legislature to Align and Develop Policy for Grant Consolidation and New Grant Programs
 - Provide grant guidelines (i.e., equity lens, due dates, administrative impact on grantees, accountability measures, and grant criteria) that the Legislature may use when developing new grant programs.
 - Include a small district support position in its policy option package to assist small districts with grant requirements. (Please note: GEER funds are currently approved to support a limited-term position, but funding for a long-term district support position is still needed.)
 - Implement protocols for developing its agency recommended budget that considers the equity and administrative impact of recommended new grant programs. A summary of equity and impact will be shared with the Legislature.
 - ODE will continue to analyze current and future grant programs for additional consolidation and alignment.
2. Legislature Aligns Policies to Support Grant Consolidation and New Grant Programs
 - ODE recommends to the Legislature that it consider the ODE grant guidelines when developing new statutes to amend or create new grant programs. Guidance may include due dates, administrative impact on grantees, accountability measures, and grant criteria.
 - ODE will coordinate with COSA and other key partners to support the adoption and implementation of the recommendations.
 - ODE supports the Governor's budget during the legislative process to assist the Legislature with consolidating redundant or outdated grant programs, as determined by the legislative process.

B. Recommendations Related to People, Systems, and Practice

3. Consolidate and Integrate District Grant Applications

- Pilot, test, and implement streamlined and integrated grant applications for federal and state grants. Pilot programs include:
 - Integrated application for the Continuous Improvement Plan (CIP) plus five state grant programs: High School Success (HSS), Student Investment Account (SIA), Every Day Matters (EDM), Early Indicator Intervention System (EIS), and Career and Technical Education - Perkins V (CTE).
 - Streamlined and consolidated federal grant application
 - Integrated Child Nutrition Program Application

4. Streamline ODE Grant Practices and Processes

- Create a workgroup to identify and significantly reduce redundancies in data and information requested from districts, including requests for data already available to ODE.
- Develop easy-to-access information to support grant recipients and ODE grant managers to understand and manage grants.
- Continue to improve training and technical assistance to grant recipients and ODE grant managers.
- Provide easy to access information on grant requirements, due dates, and other key information to manage grants.
- Set up structures for ODE cross-office collaboration and coordination across grant programs to further refine, align, and improve the processes and tools for collecting and visualizing data.
- Request authority and funding for procurement staff to streamline grants, contracts, and IGAs.

5. Improve ODE Technical Systems for Grant Management and Reporting

- Procure a new end-to-end Grant Management System.
- Implement a revised IDEA General Supervision Framework and improvement system (to replace SPR&I) in order to improve supervision, compliance monitoring, and progress monitoring of key indicators for IDEA grant programs.
- Develop Internal Grant Data Dashboard for the ODE Intranet to analyze the scope and contact of the total grant portfolio.
- Develop a “heat map” to show how grants are disbursed, including the concentration of grants and grant investments by school districts.

6. Improve Access to Grant Information and Support

- Maintain easy-to-access contact lists for districts and ODE.
- Consolidate and streamline communications (e.g., reduce/integrate emails, newsletters, communication tools).
- Provide more intensive and differentiated support for small districts.

7. Align Grant Requirements, Standards, and Practices for Community Engagement

- Develop ODE common standards and practices for community engagement that include ongoing engagement on core themes.
- Create a clear and aligned roadmap for community engagements across grants.

- Provide resources, training, and support for districts to navigate and deepen community engagement to inform investment decisions.