

The Systems We Have:
An Overview of Oregon's PreK-12 Education Accountability Ecosystem
Fall 2023

Introduction and Purpose

Oregon's Pre-K-12 education system is shaped by how federal and state laws, programs, and initiatives interact. The House Education Committee for the 2023 Interim Session has asked that ODE describe the elements of accountability within the system. This high-level overview has been developed as an informational resource to go alongside a presentation to the Legislature on Monday, November 6, 2023.

Understanding Accountability

House Bill 2656 (2023) calls for an advisory committee to "review accountability programs in other states and make recommendations . . . on the expansion or revision of an education accountability framework." ODE has actively begun to organize for this effort as required by the legislation.

One of the first points of departure is to try to develop a shared understanding of what system, educational, elected, business, and community members mean when questions arise about educational accountability.

→ **The desired outcome of any conversation around accountability in education is to ensure resources are appropriately, effectively, and efficiently utilized to produce successful outcomes and experiences for students.**

ODE can identify several insights that impact having an educational system with strong shared accountability in Oregon. Here are four of them which will be discussed further in the presentation to the committee:

- 1) **The system is flooded with good intentions.** Schools and districts and ODE actively administer 108 programs with a range of educational theories of change and different accountability frameworks.
- 2) **Accountability means something different amidst partners, educators, elected officials, and the general public.** Educators know accountability as a term used initially in 1980's educational reform that led to No Child Left Behind. They don't translate the term to integrity or excellence, instead they think of high-stakes and shame. The general public see accountability more broadly as being a good steward, being effective, and ensuring results.
- 3) **System effectiveness is advanced by coherence, professional capital, and quality resourcing.** [Michael Fullan's work](#) is most well known in this domain but there are several researchers and educational theorists who've named the need to support and strengthen professional capacity while setting very clear drivers for change over time. Oregon has several of these elements now in place - but early progress is often competing with the cacophony of other efforts (refer to variable 1).
- 4) **Oregon has design conundrums around the use of standardized assessments and the role of Legislature and ODE in systems change relative to local school districts and regional designs.**

We want families to opt out of an assessment that we also want students to pass to graduate. We want local knowledge and to trust educational professionals but we also want to prescribe and intervene in certain dimensions. We use a different system implementation map for CTE, Integrated Guidance, Regional Educator Networks, STEM Hubs, Early Learning Hubs, and CCO's. It's hard to call for accountability when core features don't seem to align and make sense.

Pursuing Equity and Excellence

ODE recognizes its collective responsibility to create conditions that lead to high-quality equitable outcomes for each and every Oregon student. Equitable educational outcomes are defined as the improvements in health, behavior, actions, attitudes, or policies that impact students, educators, people, groups, and organizations with whom our work is in relationship, and that reduce disparities within or between student populations.

ODE approaches its responsibility for equitable outcomes with humility and awareness about what it means to support communities, young people, and educators across Oregon from the role of a state agency. The work of ODE includes being curious, consistent, innovative, focused, accurate, and persistent in understanding and pursuing equitable outcomes as experienced by and understood through the lived experience of students, families, educators, and communities, in addition to state or federal level policy frameworks or metrics.

ODE's efforts to advance equitable outcomes rely on effective partnership. Partnership means a group of organizations, Tribes, districts, and/or individuals who agree to work together with a common interest and shared vision. In a partnership, there is a high level of trust and two-way communication, and differences in power, authority, and privilege are addressed. Roles and responsibilities on all sides are well-defined and mutually respected.

Four Common Goals

ODE's Statewide ESSA plan establishes four common goals, also referred to as commitments. These are also deeply aligned and have been communicated through the implementation of the Student Success Act.

1. Equity Advanced
2. Well-Rounded Education
3. Engaged Community
4. Strengthened Systems and Capacity

System Summary

Oregon's public K-12 education system includes 197 districts and 19 regional education service districts (ESDs). There are currently 552,380 students in public schools based on [fall 2022 enrollment data](#). Racial and ethnicity summary data is widely available. Oregon's spring 2022 graduation rate was 81.3% for all students and has generally been [trending upward](#) for all students and student groups over the past decade. Our [2021-22 State Report Card](#) shows that the statewide class size median was 22 students. In the 2021-22 school year, Oregon's students of color accounted for 40.3% of the overall population, while Oregon educators of color represented 12.2% of the overall educator population.

An Array of Approaches

ODE meets its responsibilities through a continuum of approaches from providing technical assistance and building capacity to approving corrective action and resolving appeals. The following array of approaches illuminates how ODE seeks to meet its range of state and federal responsibilities in pursuit of its mission, goals, and values.

Policy Development, Rules and Implementation	Mutual Stewardship or Shared Governance	Supporting Better Practices	Knowledge Generation, Analysis, Research
<ul style="list-style-type: none"> ● Community Engagement ● Tribal Obligations and Consultation with Oregon Tribes¹ ● Feedback loops ● Use of Public Comment 	<ul style="list-style-type: none"> ● Advisories ● State Board ● Tribal Obligations and Consultation ● Student, Family and Community Engagement ● Private schools, as required 	<ul style="list-style-type: none"> ● Primary Prevention ● Technical Assistance ● Professional Learning ● Coaching ● Supporting innovation 	<ul style="list-style-type: none"> ● Research ● Studies ● Pilot efforts
Capacity Building	Oversight, Quality Controls, Accountability	Formal Intervention, Legal Compliance, & Enforcement Authority	Mobilizing resources while protecting public trust
<ul style="list-style-type: none"> ● Knowledge Mobilization ● Identifying and Removing Barriers 	<ul style="list-style-type: none"> ● Data Collection and Reporting ● Audits ● Implementing state and federal accountability systems ● Intervention ● Risk Assessment ● Budget and expenditure reviews for allowable use ● Monitoring² 	<ul style="list-style-type: none"> ● Corrective Action ● Complaints ● Appeals ● Orders ● Sanctions ● Penalties ● Risk Designation 	<ul style="list-style-type: none"> ● Grant solicitation ● Grant awards ● Grant management ● Grant evaluation ● Procurement ODE

¹ ODE recognizes the sovereignty of the nine federally recognized Tribes of Oregon, and honor our commitment to meaningful and respectful Tribal consultation.

² In certain instances, ODE has both the authority and responsibility to conduct monitoring activities, ensuring compliance with regulations and policies, as part of its comprehensive approach to fulfilling its mission, goals, and values. Desk monitoring, on-site monitoring, and targeted monitoring are examples of monitoring practices.

Elements of Oregon’s Current Education Accountability Systems

The following table seeks to illustrate the extent to which similar elements at the state federal level are aligned. It is intended to be read row-by-row.

State	Federal	Shared and Aligned?
Community and Focal Student Engagement	Community and Focal Student Engagement	Varies - progress in alignment through Integrated Guidance - still room for improvement
Continuous Improvement and Strategic Planning with required design inputs, use of an equity lens for some initiatives	Continuous Improvement Planning	Federal alignment mostly accomplished through Integrated Guidance, still inconsistency across state initiatives
Oregon Standards for Public Schools (“Division 22”)	Rigorous academic standards	D22 provides the “rules of the road” and includes rigorous instructional standards.
Longitudinal Performance Growth Targets	Accountability Indicators and Federal Targets (i.e., Perkins)	Mostly aligned but inconsistent in how metrics are used and understood, SIA doesn’t require a math indicator
Local Optional Metrics		A state-only design feature of the SIA and broadened use through Integrated Guidance
Establishing System Requirements		High School Success, Early Literacy, and 819 implementation are examples of state-directed efforts to create universal systems in districts and schools
Statewide Assessment System	Statewide Summative Assessment System	Oregon’s state summative tests provide reliable and comparable information for student groups about opportunities to learn in English language arts, mathematics, and science
Transparency through Public Access, Input, and Reporting	Transparency through Public Reporting of Data	Some state programs require school board approval of plans and/or public access to certain information on websites.

		Federal reporting contains requirements for certain accountability data.
Progress Markers and Programmatic Reporting	Federal Monitoring and Programmatic Reporting	Variation in focus based on program, theory of change, and structure. Room for improvement in alignment.
Scaling and Targeting Investments		State is funding Student Success Act advisories and other community-centered or focused efforts with intention that leading improvements get scaled with SIA and SSF investments.
Financial Management and Reporting	Financial Management and Reporting	Different reporting timelines and fiscal years, mostly aligned with room for improvement
	School Identification as part of Federal School Improvement	Federal design where schools are identified for targeted and comprehensive support (low resources)
General Supervision (rules)	General Supervision	Under Oregon Revised Statute (ORS) 343.041 and Oregon Administrative Rule (OAR) 581-015-2015, ODE is authorized to administer general supervision as follows: – “a system that enables the Department to monitor whether the requirements of the Individuals Disabilities Education Act (IDEA), Oregon Revised Statutes (ORS), and Oregon Administrative Rules (OAR) are being effectively implemented by school districts and programs in compliance with legal and regulatory requirements”.
Intervention and Corrective Action	Intervention, Risk Designation, and Corrective Action	Similar tools sets but often applied different by program

Auditing	Auditing	SIA creates a state pathway for regular, performance, and random auditing of districts within what is feasible. All districts submit routine audit information for state budget process. Federal programs use a mix of audit designs. Low alignment
Intensive Program	More rigorous federal interventions for identified schools that do not demonstrate improvement.	Oregon’s intervention is most robust, inviting at least four years of partnership with highest needs districts and dedicated additional funding.

State Programs and Initiatives

There is significant information about each program and initiative on ODE’s website. These programs are listed and summarized briefly given their key design features related to an overview of accountability.

Program or Initiative	Established	Brief Summary	Key Information
Oregon Standards for Public Schools (Division 22)	1980	The rules contained in Chapter 581, Division 22 of Oregon Administrative Rules (OARs) are the educational standards that the Oregon Legislature or the State Board has determined must be met in order to be a standard school district. Compliance with the Division 22 Standards ensures every student in Oregon public schools is provided with a baseline level of service.	<ul style="list-style-type: none"> • A school district is presumed to be standard unless a deficiency is found. • Annual assurances of compliance are made to the local school board and community and to ODE. • If a district is out of compliance with one or more rules (i.e. a non-standard district), a corrective action plan must be approved by ODE. • Districts’ self-reporting on assurances is counterbalanced by a complaint and appeals process.
Integrated Guidance	2022	Oregon implemented a process that combines six ODE initiatives	<ul style="list-style-type: none"> • Reduces reporting burdens on districts while

		into a single engagement, needs assessment, planning and reporting system, with its own process for monitoring district compliance and providing needed support to the schools that need it most. The Integrated Guidance addresses school improvement processes and strategies for six State and Federal programs, including the Student Investment Account, High School Success, CTE Perkins, and Every Day Matters.	reinforcing central tenets of our federal accountability system defined by the Every Student Succeeds Act (ESSA) ³ . <ul style="list-style-type: none"> • Establishes strategic planning process every 2 and 4 years. • Establishes Longitudinal Performance Growth Targets, Local Optional Metrics, and Progress Markers
English Learner School & District Improvement Plan	2015	House Bill 3499 directs the ODE to develop and implement a statewide education plan for English Language Learners in the K-12 education system.	<ul style="list-style-type: none"> • Addresses disparities experienced by English Language Learners in every indicator of academic success, from the historical practices leading to disproportionate outcomes for the students to the educational needs of the students from K-12 education, by examining and applying culturally appropriate best practices.
Intensive Program	2019	SSA legislation established the Intensive Program , which is by invitation only, based on eligibility determined by ODE. Participation in the program is for a minimum of four years and requires each district to form a Student Success Team (SST) that meets regularly to monitor practice and progress of SIA investments and additional funds received through the Intensive Program.	<ul style="list-style-type: none"> • An important aspect of participation in the Intensive Program is that school boards and superintendents must accept all recommendations of the SST pertaining to general programs and practices.

³ Districts and schools that are identified for Comprehensive Support and Improvement (CSI)/ Targeted Support and Improvement (TSI) are also expected to utilize the Integrated Guidance process to live into their school improvement commitments and for budgeting.

Statewide Education Initiatives	2019	The Statewide Education Initiatives Account supports the creation of new programs and/or the expansion of existing programs at the ODE aimed at improving educational opportunities for Oregon students, especially historically underserved student groups.	While not an exhaustive list, some programs funded through this account include: <ul style="list-style-type: none"> • African American/Black Student Success Plan • American Indian/Alaska Native Student Success Plan • Latino/a/x & Indigenous Student Success Plan • LGBTQ2SIA+ Student Success Plan • School Meal Program Expansions • Youth Reengagement Program • Diversifying Educator Workforce • Summer Programs for Title I Schools • Early Indicator and Intervention Systems • Accountability and Transparency • Promoting Mental Health: Safe and Inclusive School
---------------------------------	------	--	--

Federal Accountability Programs

There is also significant information about each federal program and initiative on ODE’s website. Again, these programs are listed and summarized briefly given their key design features related to an overview of accountability.

Program or Initiative	Established	Brief Summary	Key Information
School Accountability (Title IA)	2001 under No Child Left Behind, Reauthorized as the Every Student Succeeds Act (ESSA) in 2015	Required rigorous academic standards and statewide assessments to measure achievement of these standards; incorporated growth into meaningfully differentiating schools for additional support	Shaped by federal reauthorization of the Elementary and Secondary Education Act established in 1965. Maintains an expectation that there will be accountability and action to effect positive change in our

		and attended to gaps in opportunity and support for focal student groups	highest-need schools. Oregon’s current federal accountability system was originally developed with strong community and Tribal engagement. The original ESSA Consolidated Plan was submitted on May 3, 2017.
Individuals with Disabilities Education Act	1975	Entitles students with disabilities to a free and appropriate public education (FAPE) for students in the least restrictive environment (LRE)	Each state must report annually to the Secretary of Education and to the public on the progress of the State, and of children experiencing disabilities in the State, toward meeting the purposes of the IDEA, including specific goals established within the State Performance Plan (SPP).
System of General Supervision		System that enables the Department to monitor whether the requirements of the Individuals Disabilities Education Act (IDEA), Oregon Revised Statutes (ORS), and Oregon Administrative Rules (OAR) are being effectively implemented by school districts and programs in compliance with legal and regulatory requirements	Oregon’s General Supervision Framework incorporates Integrated monitoring activities, self-assessment, data collection, analysis and reporting, on-site visits, review of policies and procedures, review of the development and implementation of IEPs and IFSPs, improvement planning, corrective action, and auditing federal fund use.
Perkins V Career and Technical Education	1984	“Strengthening Career and Technical	Aligns fiscal, program, and accountability

		Education for the 21st Century Act” (more widely known as Perkins V). Leverages ongoing partnerships across the state and identifies actionable strategies to ensure high-quality learning that is accessible to all learners in Oregon	efforts to maximize ODE’s ability to drive the change necessary in our state to accomplish our vision on behalf of all learners. Accountability measures and budget priorities are identified.
Statewide Assessment System	1991	Statewide academic achievement testing in essential skills in Grades 3, 5, 8, & 11	Grade level expectations as applied to essential skills to provide a statewide census of academic learning

The Elementary Secondary Education Act includes a number of other [programs](#), including:

- Title I-C: Migrant Education
- Title 1-D: Neglected and Delinquent or At-Risk Children
- Title II-A: Supporting Effective Instruction
- Title III: English Learners and Immigrant Youth
- Title IV-A: Student Support and Enrichment
- Title IV-B: 21st Century Community Learning Centers
- Title IV-C: Charter Schools
- Title V-B: Rural Education Achievement Program
- Title VI-A: Indian, Native Hawaiian and Alaska Native Education
- McKinney-Vento (formerly Title X): Education of Homeless Children and Youth

Recognizing the Accountability Ecosystem We Have

ODE is formalizing the work to launch an advisory process that is responsive to HB 2656. We will focus on clarity of purpose and operational integrity. ODE is developing a visual map of Oregon’s K-12 education accountability ecosystem that will assist the advisory committee, the Legislature, and the public better understand how the elements and programs shared in this high-level overview interact. That work is about 80% complete and should be available by January 2024 at the latest.

This work will allow our state not just to have a conversation about accountability but to consider changes and a framework that could increase focus and provide the support schools and districts need. We must continue to work together to further increase effectiveness and coherence in order to have the credibility and alignment needed to see shared accountability.