



**COALITION OF
OREGON SCHOOL
ADMINISTRATORS**

Coalition of Oregon School Administrators
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Date: March 22, 2023
To: Senate Education Committee
From: Morgan Allen, Coalition of Oregon School Administrators
Subject: Concerns regarding [Senate Bill 1045](#)

Good Afternoon Chair Dembrow, Vice Chair Weber, and Members of the Senate Education Committee

For the record, my name is Morgan Allen with the Coalition of Oregon School Administrators. COSA represents over 2,800 administrators across Oregon who serve in roles ranging from principal, to central office administrator, to superintendent.

Our members have concerns with Senate Bill 1045 and the -2 amendment - as currently written - and believe that the bill could be enhanced by giving ODE the tools to offer technical support, professional development, coaching, and support to school districts in order to head off non-compliance with all state and federal laws.

Background on ODE Oversight of School Districts - Division 22

At present, the Oregon Legislature and the State Board of Education have determined that the Oregon Administrative Rules in Chapter 581, Division 22 must be followed and met for a school district to be considered "standard." Division 22 requirements include items you might expect, such as diploma requirements and required instructional hours. It also includes such items as universal screening for dyslexia and fingerprinting. The list is broad and district compliance is meant to convey a level of basic service and support for students in our K-12 system.

A Brief Summary of Current Accountability for Division 22

ODE monitors Division 22 compliance through professional learning and training, district complaint processes, and, most importantly, the school district assurances process.

School districts are currently required to submit an assurance report to the community they serve at a school district board meeting, post the report on the school district website, and submit the assurance report to ODE. For each Division 22 requirement, the school district has



to report whether or not they are in compliance with the requirement. If a district reports being out of compliance, ODE staff will follow up with the district.

The current Division 22 follow-up process requires ODE to provide coaching or technical support and assistance to correct areas of noncompliance. If a district is found to be out of compliance, the district must submit a plan (approved by ODE) to come back into compliance by the beginning of the next school year. An extension of up to twelve months may be offered if the correction cannot be made by the beginning of the next school year. Ultimately, if a district does not comply with the Division 22 requirements, ODE may withhold State School Funds until the district comes back into compliance.

Senate Bill 1045 Proposes a New System of Oversight and Accountability at the State Level

Senate Bill 1045 would make significant changes to the oversight and accountability role of the Oregon Department of Education.

1. Elevates compliance with all state and federal laws related to student health and safety, discrimination, special education, or access to education to an enhanced Division 22-like level of compliance.
2. Expands the Department's responsibilities in monitoring compliance, conducting annual reviews, and approving and enforcing corrective action plans.
3. Gives the Department the authority to:
 - a. Withhold funding Student Investment Account funding or other grant funding identified by the State Board of Education by rule;
 - b. Direct or approve expenditures of school district funding;
 - c. File a complaint with the Teacher Standards and Practices Commission for an investigation of an administrator licensed by the Commission;
 - d. Designate the school district as a high needs school district for the intensive program.
4. Requires the Department to report a list of districts and education service districts that are "nonstandard" or "conditionally standard" and give public notice of that determination in a manner accessible to the residents of the school district, as well as report to the Legislature.
5. Mandates that the Department consider a district to be "nonstandard" if a district adopts a list of textbooks and other instructional materials that are not on the Department's approved list.
6. Directs the Department to collect course-level completion and grades for all middle and high school students, and report that data and information as part of the Oregon School Report Card.



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COSA members support the goals of this bill - ensuring that school districts are adhering to state and federal laws and requirements. However, there are a number of provisions that we have questions and concerns about that we would like to review in more depth with the Governor's office and education partners.

For example, Section 3 of SB 1045 would apply to the 2024-2025 school year - what communication, technical support and tools, and professional development will be in place to support school districts and ESDs as we transition to a completely different accountability system? How will support be differentiated based on different needs of districts and education service districts?

Before this bill moves forward, it is imperative that the Governor's office, education partners, and legislators review this bill and consider intended and unintended impacts. And most importantly, come to a consensus on how to support our students, while increasing accountability and giving school districts and education service districts the tools needed to ensure they are not out of compliance in the first place.

We at COSA, along with our members, are ready to support such a collaborative effort.