

Senator Dembrow and members of the education committee:

My name is Jon LaFollette, and I am the SEIU sub-local chapter President at the Teacher Standards and Practices Commission (TSPC). I am submitting the below as my comments in regard to the proposed legislation to merge TSPC within the Oregon Department of Education (ODE). I have reviewed the report that was submitted to the Education Committee on December 31, 2023. In that report there were two scenarios presented – one was to keep TSPC as a separate agency and the other was to merge TSPC into ODE. I would strongly urge the committee to consider not merging TSPC into ODE for the following reasons:

1. The proposed cost would be \$1.9 million dollars above the cost of what it would take to continue to operate TSPC as a stand-alone agency. I know from listening to the hearing held in January 2024 that Senator Dembrow had questions about the cost especially when ODE would likely have to increase its own agency staffing to accommodate the merger. This increase in ODE staffing would in turn also mean that the agencies that provide essential services to ODE and TSPC (DAS HR and DAS IT) would also have to increase their staffing in kind in order to maintain the required personnel ratios that would result from a merger of ODE/TSPC.
2. The report did not identify that there were instances of duplication of work by TSPC and ODE that would make this merge make sense. Yes, there are instances that certain overlaps do occur but it did not rise to the level of duplication of work. The report failed to conclude that merging would be in the best interest of the two agencies nor did it conclude that a merged agency would run more efficiently.
3. The application system educators use to apply for a teaching or administrator license is in the midst of an upgrade. The merging of the agencies could potentially hinder that upgrade considering ODE and TSPC do not use the same electronic database systems. The merger could further delay the issuance of educator licenses at a time when expedited licensure processing is improving. The governor has declared that customer service is a top priority for her administration, why cause even more delays in licensure processing at a time when customer service is a top state-wide priority?
4. The misconduct investigations conducted by TSPC and ODE are not being completed in a timely manner. Workload and insufficient staffing are the root cause at both agencies. A merger would cause both agencies to fall further behind in the short-term as the details and nuisances of an agency merger would be the primary focus for months if not years. This would result in innocent or wrongfully accused educators being out of the classroom longer, and/or potentially dangerous educators remaining in the classroom longer while investigations are delayed. This fact also seems to be directly at odds with the Governor's pledge to make customer service a top Oregon priority. In the calendar year 2023 TSPC opened 340 investigations and had an additional 229 referrals that were reviewed to determine if an investigation was warranted. These 340 investigations were primarily assigned to four (4) investigators; an average of 85 investigations per investigator per year. The amount of incoming investigations far exceeds current staffing levels. TSPC's Interim Executive Director, Melissa Goff is working to address this issue by requesting additional staffing for TSPC. It does not make sense to merge the

investigative units together at a time when both units already under-staffed. The merger is not going to help speed up the process of getting investigations done or address the backlog of cases. The only remedy is increasing staffing. TSPC is working towards that end and has received approval from the LFO to move forward with the required staffing increases even if only for a limited duration. The hope is that those positions would be moved to full time positions during the next biennium budget cycle (2025-2027).

5. From a fiscal standpoint for TSPC employees, the proposed merger would result in additional personal expenditure; TSPC employees will not have to pay for parking when they start working at the ODE building. Currently TSPC employees that come into the office do not have to pay a fee for parking. This additional expense will add to the amount that an employee has to pay on a monthly basis that will subtract from what they can utilize to live on. There is not an option for employees to get reimburses for parking at this time. This cost could run an average of \$1000 a year depending on which parking/transit option an employee chooses. These costs are not something that employees have budgeted for. during the year for those that either work a hybrid or come into the office on a daily basis.

It is my suggestion that the Education Committee not approve this legislation. Please do not vote for the merger of TSPC and ODE in Senate Bill 1550.

Respectfully,

Jon LaFollette  
SEIU Sub-Local 584 President