

November 14, 2025

Dear Co-Chairs Sollman and Ruiz, and members of the Joint Public Education Appropriation Committee,

As the current chair and a volunteer of the Quality Education Commission since 2019, I would like to thank you for your work, offer additional context, and underscore that your draft report highlights many areas of common ground on needed improvements to the Quality Education Model (QEM). This is an opportunity to coalesce around some major updates to create a trusted, accurate, precise, and valid cost estimation process that we can all rely upon to identify what's needed to serve students well.

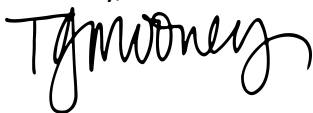
I also request that the Legislature provide direction on how to proceed for the QEC's 2026 report, due according to statute on August 1. Currently, significant ODE staff and volunteer time is being spent on that report. The use of public resources is paramount in this budget environment.

1. **We agree on a lot.** The QEM number is often weaponized, and most attention is on the dollar figure rather than the underpinnings that produce that figure. The JPEA's draft report begins to paint a path forward to updating the 26-year old model. Oregon's methodology for estimating per student and school education costs must be more aligned with national best practice, relevant, and make the most of every public dollar for education. We also share a need for improvements to the model itself and the process that produces the model. For example, I agree on these recommendations from JPEA:
 - a. Connect the dots between the goals used for funding and goals used for systems of accountability. The QEM goal uses a single 90% graduation goal, whereas there's 7 more specific measures in the new Accountability law (SB 141).
 - b. Improve the Quality Education Model's precision and accuracy by modernizing how student and community context/need are considered (i.e., more types of "prototype schools"). There's considerably more nuance in Oregon schools than the current basic framework developed 26 years ago allows for. Our current model does not make sense for today's realities, or tomorrow's. It needs an update.
 - c. The QEM would benefit from more research expertise and greater participation from educators/practitioners. Research says states should have multiple "professional judgement panels" who have expertise serving students in the prototype school contexts. However, state statute and its implementation with ODE staff expertise has effectively held only one professional judgement panel- the QEC. Clearly, there is an opportunity for more engagement with experts.
2. **The February 2025 independent evaluation of the QEM gave us the most insight on how to align to best practices that we have ever had in its 26-year history.** Any high-stakes decisions baked into statute, including how states estimate education costs, should deservedly have periodic reviews from multiple stakeholders. I'm grateful that SB 1552 (2024) created the opportunity to review the QEM in particular. From this evaluation, we now have a framework of best practices of what a cost estimation process *should* include, and how we can improve. I hope that any future updates to the cost estimation process include periodic reviews that

don't wait nearly three decades for an independent evaluation.

3. **There is a disconnect between what is written into policy about the Quality Education Commission and how it works in practice; it relies heavily on staff expertise.** While [state law](#) says the Quality Education Commission should create a biennial report by August 1 of each even-numbered year about the costs sufficient to meet a quality education, the Commission is entirely dependent upon expert technical staff at the Oregon Department of Education (ODE) to create the conditions for the Commission to fulfill its role related to a highly technical, statistical model. The Commission meets to review staff work and provide input on additional practices. Further, while state statute specifies 11 members appointed by the Governor and confirmed by the Senate, there are currently several vacancies.
4. **The Legislature deserves to have the accurate, precise, reliable, and valid information on which to make education budget decisions.** While education investments are critical Constitutional responsibilities for the State, clearly these are not the *only* responsibility or cost (health, human services, etc). Your draft report suggests that all education revenue the State invests should count toward whether Oregon meets its Constitutional obligation in Article VIII, Section 8, passed in 2000 through Ballot Measure 1.¹ The QEM was created in 1999 when the State School Fund (SSF) was the only major education funding for schools. With the passage of the Student Success Act in 2019 and now about 100 ODE grant programs, the JPEA report implies that the QEM should identify the full cost of K-12 education, not just the full cost of what SSF funding should be. It will be helpful to clarify what QEM is intended to identify. Is it supposed to tell policymakers what the recommended SSF amount is? Or K-12 education entirely? And where does early learning and higher education fit in given the JPEA's flag that these do not have measurable goals in the same way that K-12 education has?
5. **The model assumes that educators know what's in the model, and that school board members and district leaders who develop and approve budgets actually know it too; but that assumption doesn't pan out in practice.** I agree with the JPEA's recommendations that model documentation should be transparent and digestible for the public, developed by those responsible for the statistical components of the model. School and district leaders, labor partners, business officials, and school board members being aware of the components will help connect the dots between funding, spending, and outcomes and will strengthen clarity and coherence of our education system.

Sincerely,



Dr. Tricia Mooney,
Chair, Quality Education Commission
Superintendent, Hermiston School District

¹ [Oregon Legislative Counsel presentation to JPEA on 9/30/25.](#)