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Dr. Charlene Williams
Director of the Department of Education

TO: Chair Hudson & Members of the House Education Committee

DATE: Dec 4, 2025

FROM: Zoe Larmer, Government Relations Director

RE: Questions posed during informational on Accountability

Chair Hudson and Members of the House Education Committee,

Thank you so much for the opportunity to share more information. Please find below our responses to questions that have been asked regarding our shared accountability work, both in committee and as sent to the agency for follow up.

We appreciate our continued partnership on behalf of all Oregon students. Please do not hesitate to reach out to me if you need further clarification.

With gratitude,
Zoe Larmer

Question: What does the future look like for data collection on Interim Assessments?

ODE is currently working on establishing the appropriate channels to collect the required interim assessment data from districts. Since interim assessment data is not collected currently, ODE is investigating options around collection that do not increase administrative burden. However, most districts already utilize interim assessment data for their local decision-making, therefore the one “new step” in their process will be providing the data to ODE in a way that can be utilized at the state level. Our team is actively working to determine the best path forward and ensure the data collection aligns with the purpose and intent of interim assessments. The Department is also looking at the internal structure needed to manage effectively all the different aspects that come with this part of the work.

Question: I've heard that ODE won't be collecting interim assessment data. Given that the statute says the Department will consider interim assessment data when determining whether a district is ready to exit the coaching program, how will this work?

ODE will be collecting interim test data from districts in order to help support understandings of within-year academic growth. If the State Board of Education approves our proposed rule in January, the department will work with education and community partners to establish test windows, reporting



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requirements (including interim test data collection), and an adoption cycle for renewing approved interim tests. ODE will also be working to develop guidance, training, and expectations for district implementation of interim tests in 2026-27, as required by the bill.

The within-year growth data provided by district interim tests will also be considered in determining whether a district is ready to exit the coaching program. ODE will review progress toward the Performance Growth Targets, which includes the 7 Common Metrics, and the school district's choice of a Local Metric, and engage in conversations with school districts around their interim assessment data as well as other local contextual information.

Question: If the data will neither be collected by the department nor used for cross-district comparisons, is there a reason to limit the approved assessments to a list of four, other than that being what was written into the bill?

ODE is currently developing a plan to collect interim test data in the 2026-27 school year to view within-year growth. The department will also work with education and community partners to develop appropriate ways of interpreting data from the different interim tests that are anticipated to be approved by the State Board of Education in January. As we work on creating defensible comparisons of the within-year growth our scholars are making across the state, leveraging interim assessment tools that are among the best four available is a first step in that direction.

Question: When considering changes like interim assessments or the proposed PBAM changes, how is the department considering district procurement timelines and/or the need for districts to make contract changes?

ODE has been mindful of the fact that districts and public charter schools are currently engaged in contracts with assessment vendors. Districts have reported that those contracts can range from 5-7 year commitments. The bill requires implementation in 2026-27. The department is working with education partners and districts to define the scope of this impact on districts that will decide to switch interim tests or those who do not have interim tests in place already: 1) What are the anticipated fiscal costs for implementing this bill? 2) What is the range and average of current district contracts and are they possible to terminate without fiscal penalty? There are also districts who do not experience new fiscal impacts. Those are districts whose interim tests will be on the approved list, which was generated through an open, competitive Request for Qualifications process that involved national and state measurement experts, ODE staff, district/ESD partners, and community members. Those districts will be able to continue with what they have in place.



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For the PBAM, ODE has listened to feedback and recognized we must move at a pace that maintains stability for students and staff. For this reason, we have adjusted the implementation timeline to July 1, 2027 to provide additional time for continued engagement and readiness. We are also coordinating with financial software vendors to decrease burden and costs across Oregon's education system as much as possible.

Question: What feedback has the Department received from its advisory committees that either hasn't been or can't be incorporated into the implementation?

Interim Assessments: The department has been able to incorporate almost all feedback from education and community partners, while ensuring we properly followed the competitive procurement process required for the Request for Qualifications (RFQ). Here are some examples of how feedback was incorporated:

- Our [Oregon Technical Advisory Committee](#) (TAC), composed of national measurement and accountability experts who provide the Office of Research, Assessment, Data, Accountability and Reporting (RADAR) leadership with advice regarding the Oregon Statewide Assessment System and federal and state accountability, advised us to divide the process into two phases, one technical and one for Oregon-specific concerns that went beyond technical adequacy.
- ODE planned to use existing technical adequacy criteria that had been developed by EdReports and The Center for Assessment ([G3-8 Mathematics](#) & [G3-8 English language arts](#)). We received feedback from our TAC and from close education and community partners that these standards were too complex and should be simplified for RFQ purposes. This was accomplished, as evidenced by the scoring criteria used in the RFQ (see [RFQ: Attachment D](#)).
- The department has also been consulting with education and community partners in the development of an Oregon Administrative Rule (OAR) for adoption of the interim assessments and clarification about specific implementation requirements. Engagement has included the Ongoing Rules Community Advisory (ORCA), education and organizational partners in two Technical Advisory Committee meetings, and the State Board of Education.

Local Metrics/Differentiated Metrics/PGTs:

To date, the department has successfully incorporated all feedback on the Performance Growth Targets (PGTs). However, we continue to work on addressing feedback related to Local Metrics and Differentiated Metrics. Currently, we are actively exploring options in two key areas:



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- **Differentiated Metrics:** We are considering ways to provide clearer definitions of the specialized services offered by Education Service Districts (ESDs). This includes identifying appropriate metric options that account for the wide variation in program types across ESDs.
- **Local Metrics:** We are continuing conversations on how best to measure the metrics outlined in the draft rules. The most significant area of focus is incorporating interim assessment data as a measure of Academic Growth. In addition, we are exploring approaches to include a metric and measurement for Student Belonging, as this remains an area of interest.

Question: What is the process looking like for charter schools in the Accountability context?

We are committed to working closely with charter school leaders and authorizers on the implementation details to ensure clarity, and alignment with the unique missions, models, and governance structures of Oregon's charter schools. To that end, we are:

- **Convening engagement sessions** to gather input on implementation guidance, reporting clarity, and supports for charter school leaders.
- **Providing transparent communication** about timelines, decision points, and opportunities for feedback on how this inclusion will be operationalized.
- **Collaborating on resources and technical assistance** to ensure charter schools and districts have the tools they need to navigate this effectively.

Our goal is to co-develop an approach that meets statewide accountability goals while respecting the statutory autonomy and unique missions of Oregon's charter sector.

Question: What led to the decision to include charter schools in district-level metrics rather than separate them out with their own data?

This decision has been reviewed and shaped by further engagement processes conducted by the department. Based on feedback received from education partners, ODE created additional opportunities to connect with charter school administrators and gather feedback regarding the best path forward. ODE also requested additional feedback from education and community partners that has informed a change in this approach. ODE will propose that charter schools be reported separately as their own grouping of "similar districts" for these purposes. The Oregon State Board of Education is expected to determine whether this approach will be adopted in their December meeting.



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Question: How were districts involved in determining the characteristics that would establish similar district cohorts? How has the information about similar districts been communicated out to districts?

ODE conducted several presentations and engagements where feedback about the modeling process, called hierarchical clustering, as well as the student demographics that really helped define clear associations between the similar districts was identified. The similar district identifications were shared with school districts and charter schools on December 3rd, with an appeals process for entities who do not agree with their classification.

Question: Do you have an example of what the PBAM currently looks like, versus what it might look like / provide in the future? (Continued below)



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Current COA Structure

Fund	Function	Object	Area of Responsibility	Amount
201 - Federal	High School Instruction	Licensed Salaries	English	\$2,050,000
100 - General	High School Instruction	Licensed Salaries	English	\$200,000

DRAFT - New COA Structure

Fund	Grant	Function	Object	Curriculum	Grade Level	Program	Amount
200 - Special Revenue	IDEA 611	Instruction	Licensed Salaries	English	High School	Long Term Care and Treatment	\$1,200,000
200 - Special Revenue	Title ID	Instruction	Licensed Salaries	English	High School	Long Term Care and Treatment	\$850,000
100 - General	Unrestricted Funds	Instruction	Licensed Salaries	English	High School	Long Term Care and Treatment	\$200,000



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Today, Oregon's chart of accounts doesn't let us see important details about how districts spend money. The current system only shows broad information—like the fund, function, and object. In the top chart, for example, all ODE can see is that \$2.05 million in federal dollars and \$200,000 in general fund dollars were spent on licensed salaries for high school instruction. We can't tell which programs were served or which grants actually paid for the work.

Districts *do* track this information, but they have to do it outside the state system—through spreadsheets or custom local codes—because PBAM doesn't include the needed program or grant structure. This creates extra work for districts and prevents the state from getting accurate or timely information.

The updated PBAM fixes these issues in four main ways:

1. Clear, consistent program coding.

The modernization adds a clean program structure that districts can use directly in their financial systems. In the example, instead of "High School Instruction," the new chart shows that all three expenditures support the Long-Term Care and Treatment program. This eliminates duplicative local tracking and gives ODE a clear statewide picture.

2. Tracking spending by specific grant.

The new PBAM adds a grant dimension so we can see exactly which grant is funding which activity. In the second chart, you can now see that the LTCT instructor salary is funded by IDEA 611, Title ID, and unrestricted funds. Today, that detail is invisible to ODE. This improvement strengthens federal compliance, improves SEFA reconciliation, and allows clearer tracking of how funds are used.

3. Connecting finances to student outcomes.

The modernized structure integrates outcome and accountability information directly into the chart of accounts. This means districts can budget for and report the outcomes associated with the programs they fund—linking spending more clearly to student results.

4. Cleaner, rule-based data structure.

Today, information is mixed together across different code elements, which prevents districts from using basic data-quality checks. The updated PBAM creates clean, non-overlapping dimensions so coding rules can be applied. This helps reduce errors and gives the state more reliable data for oversight and decision-making.



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What this means overall

Districts will be able to submit one clean file with all grant and program information included—no spreadsheets, no manual workarounds, no re-coding. ODE will receive clearer, more consistent data that shows how dollars flow to programs and how those programs connect to student outcomes.

This work is still in development with districts and partners, but the goal is simple: move from a basic compliance system to a modern statewide financial structure that supports transparency, reduces workload, and improves decision-making.

Question: Are you developing specific problems of practice for this accountability work?

Problems of practice in education are specific, real-world challenges that affect teaching and learning and ultimately student outcomes. An important component of the Education Accountability Act is to provide a framework for how a district engages in core questions to identify and address a local problem of practice. The Continuum of Supports framework seeks to help districts develop problems of practice by:

- Define **what matters** for student success through the Five Priorities for Student Success:
 - High-Quality Learning Experiences for All Students
 - Aligned and Focused Educational Systems
 - Engaged Partners and Communities
 - Safe and Inclusive Schools
 - Committed and Supported Staff
- Define **what works** through evidence based essential practices aligned to the five Five Priorities for Student Success.
- Determine **how we know** how a district is doing related to the essential practices.
- Identify **how to get** from where we are on an essential practice to where we need to be to see improved student outcomes.