Oregon Department of Education

High School Success Grants Have Expanded Important Programs, but ODE Can Do More To Identify and Share Effective Strategies

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Oregon Secretary *of* State
Audits Division

Audit Highlights

Oregon Department of Education

High School Success Grants Have Expanded Important Programs, but ODE Can Do More
To Identify and Share Effective Strategies

WHY THIS AUDIT IS IMPORTANT

- From 2017 to 2023, over 230 districts and schools reported spending $125 million each year in Measure 98 grants to expand dropout prevention, college and career opportunities, and CTE for Oregon students in eighth through 12th grade.

- The costs of college education continue to grow, while the expected benefits of a degree face increased scrutiny. Expanded statewide CTE programs are an important pathway to career success.

- The COVID-19 pandemic was an unprecedented disruption for Oregon schools. Most outcomes targeted by HSS funds were negatively impacted.

- The Oregon Department of Education (ODE) made important improvements to district accountability with the integration in 2022 of HSS grants and other programs with related goals. The first round of integrated annual reports were due in November 2024.

WHAT WE FOUND

1. High School Success (HSS) investments have helped expand career and technical education (CTE) spaces and programs, dropout prevention supports, and programs designed to help students better prepare for college and careers. (pg. 5)

2. Specific outcomes from HSS investments are difficult to determine, in part because the HSS program makes up only 5% of total school funding and many other programs work towards the same goals. (pg. 6)

3. Student outcomes since the start of HSS are mixed, in part because of wide-ranging pandemic challenges. CTE participation increased significantly, including for students from historically underserved races and ethnicities. Graduation rates rose overall and dropout rates also improved. Other outcomes were unchanged (ninth grade on-track) or fell (college-going and regular attendance). Results were similarly mixed for historically underserved student groups, a key state focus. (pg. 8)

4. ODE has steadily improved its administration and monitoring of the HSS program, yet ODE remains largely focused on grantee compliance with limited analysis of outcomes. (pg. 21)

5. Two large-scale ODE efforts — integration of grant programs and new district growth targets under the Student Success Act — could streamline compliance requirements for school districts and identify effective investments in student success. (pg. 22)

6. Both initiatives are in the early stages and need improvements from ODE, the State Board of Education, and the Legislature for successful implementation. As we noted in a 2022 report on systemic risks in K-12 education, three past K-12 reform efforts in Oregon were eventually abandoned, reinforcing the importance of full implementation of these initiatives. (pg. 27)

WHAT WE RECOMMEND

We made eight recommendations to ODE. ODE agreed with all of our recommendations. The response can be found at the end of the report.

Oregon Secretary *of* State
Audits Division

Secretary of State **LaVonne Griffin-Valade**
Audits Director **Kip R. Memmott**

Oregon voters passed Measure 98 to address low graduation rates and prepare students for college and careers

The measure established the High School Graduation and College and Career Readiness Fund within the Oregon Department of Education (ODE). Measure 98 became effective in December 2016; school districts, charter schools, and other specialty schools with high school students began receiving funds through High School Success (HSS) grants in the 2017-18 school year. The HSS grant program has changed several times since the measure passed.

The Oregon Department of Education oversees the HSS program

ODE is a large agency responsible for Oregon's $9.9 billion state school fund, which is the main source of state funding for public schools. ODE also oversees 141 state and federal programs, including the HSS fund. These funds, combined with local taxes, allow Oregon's 1,257 public schools in 197 school districts to serve over 550,000 students from kindergarten through 12th grade. ODE staff administer and monitor grants, provide technical assistance to local education authorities, and play an important role in carrying out the State Board of Education's policies and standards.

The HSS program is housed within ODE's Office of Education Innovation and Improvement, which has a total of 87 staff divided into six teams: Systems and Capacity Improvement, Grant Management and Monitoring, District and School Effectiveness, Research and Information Systems, Secondary Post-Secondary Transitions, and Programs and Practices. ODE staff collaborate to support the HSS program by providing technical assistance to HSS grantees, reviewing and approving four-year plans and budgets, advising on programs and practices, and reviewing regular progress reports.

Measure 98 aimed to improve student outcomes with three research-backed approaches

In both 2016 and 2017, Oregon's graduation rates were among the lowest in the country. Graduation rates were even lower for many focal student groups who experience significant opportunity and participation gaps.[1] These have been persistent trends in Oregon and reflect systemic challenges that include poverty, citizenship and immigration issues, regional disparities, and widespread housing instability.

> *Five Goals of Measure 98*
> 1. Improve Oregon's high school graduation rates.
> 2. Support and improve ninth grade on-track rates.
> 3. Expand student access to career and technical education (CTE).
> 4. Expand student access to college-level opportunities and the ability to earn college credit in high school.
> 5. Reduce high school dropout rates and chronic absenteeism.

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[1] Focal student groups are defined as students of color; students with disabilities; emerging bilingual students; students navigating poverty, homelessness, and foster care; LGBTQ2SIA+ students; recently arrived and refugee students; migrant students; students with experience of incarceration or detention; and other students who have historically experienced disparities in schools.

School districts and charter schools who receive grants through HSS must use those funds to establish or expand programs for high school students in at least one of the following three areas:

CTE Programs of Study focus on providing technical and academic education, hands-on experience, and professional development opportunities to promote student success in their chosen careers. HSS recipients may use CTE funding to purchase materials and equipment, plan new or expanded programs, and support professional development through activities such as paying for students to take professional certification tests. Currently, ODE has six approved CTE program areas:

- Agriculture, Food, and Natural Resource Systems;
- Arts, Information, and Communications;
- Business and Management;
- Health Sciences;
- Human Resources; and
- Industrial and Engineering Systems.

College-level opportunities, which allow students to earn college credits while still in high school. These include Advanced Placement classes, International Baccalaureate programs, and dual-credit courses offered in partnership with community colleges. HSS recipients may use this funding in ways that include planning new or expanded courses, supporting student testing fees, and recruiting, licensing, training, and employing teachers for college-level classes.

Dropout prevention strategies, the category that is perhaps the most flexible of those allowed under HSS. Recipients may use this funding for data-informed approaches to reducing absenteeism and dropout rates and for improving graduation and ninth grade on-track rates. Among the grantee strategies:

- Introducing or expanding student counseling and wellness supports;
- Providing a variety of academic support opportunities both within and outside of the classroom;
- Providing alternative education options; and
- Supporting student presence and participation in school.

To qualify for HSS funds, applicants must submit a biennial plan approved by ODE and meet eligibility requirements. School districts and charter schools that do not meet eligibility requirements receive monitoring, support, and technical assistance from ODE. Beginning in the 2021-23 biennium, if these districts or schools still did not meet eligibility requirements, ODE placed them on corrective action plans, allowing ODE to direct a percentage of the district's HSS allocation to work toward meeting any remaining eligibility criteria.

The HSS program has undergone changes since the measure passed

House Bill 2246, passed by the Legislature in 2017 to implement Measure 98, allowed recipients to spend up to 15% of the funds they receive on supports for eighth-grade students. One purpose of the change was to fund summer transition programs to high school and help increase the number of students finishing ninth grade on track to graduate.

House Bill 2246 also created a tiered system for recipients based on their level of funding, which is based on weighted high school attendance. Under the ballot measure language, all recipients were initially

required to use funds in each of the three program areas identified in the measure. This was a problem for very small districts that could not make meaningful improvements using such small amounts. As a result of the change, recipients with:
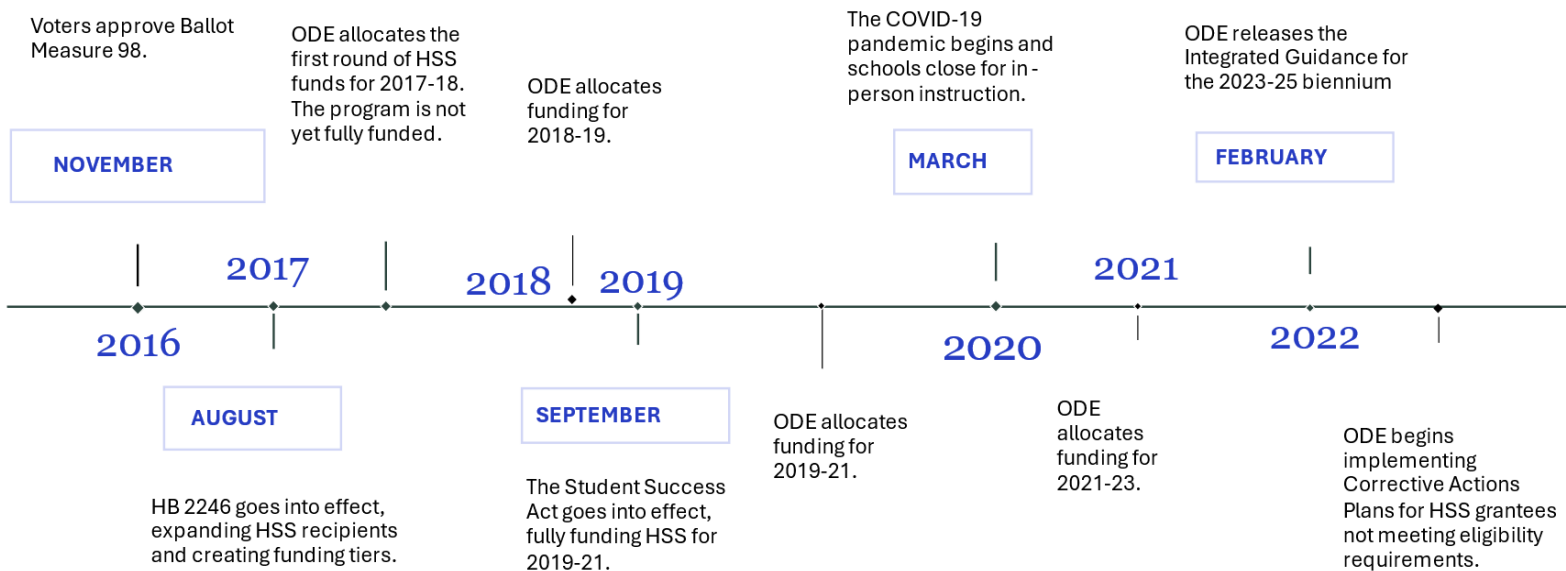
- Less than $100,000 in HSS funding may choose to address any of the three program areas;
- Between $100,000 and $350,000 must address CTE and at least one other program area;
- More than $350,000 must address all three program areas.

Under Measure 98, only school districts and charter schools were eligible to receive funding. House Bill 2246 added the Oregon School for the Deaf, the Youth Corrections Education Program, and the Juvenile Detention Education Program as eligible funding recipients.

Another important change happened in 2019. In the first budget passed after Measure 98, the Legislature only allocated approximately half of the required $800 per high school student to the fund, totaling about $170 million for the 2017-19 biennium. In 2019, the Legislature's passage of the Student Success Act filled the gap and ensured the program was fully funded by adding an additional $133 million.[2] Also in 2019, the Legislature directed ODE to look for opportunities for better alignment and integration of existing programs.

As part of a response to that, ODE released guidance for school districts as they began to integrate six programs with common goals for the 2023-25 biennium. These six programs included HSS and a newer program, the Student Investment Account, created under the Student Success Act. While the programs retained their individual requirements, ODE began to integrate applications, progress reports, and monitoring processes to streamline work for school districts and make ODE's program administration more effective. ODE continues to improve and add more programs to the integration process.

Figure 1: The HSS program has gone through several updates since Measure 98 passed in 2016

Voters approve Ballot Measure 98.

ODE allocates the first round of HSS funds for 2017-18. The program is not yet fully funded.

ODE allocates funding for 2018-19.

The COVID-19 pandemic begins and schools close for in-person instruction.

ODE releases the Integrated Guidance for the 2023-25 biennium

NOVEMBER

MARCH

FEBRUARY

2017   2018   2019   2021

2016   2020   2022

AUGUST

SEPTEMBER

ODE allocates funding for 2019-21.

ODE allocates funding for 2021-23.

ODE begins implementing Corrective Actions Plans for HSS grantees not meeting eligibility requirements.

HB 2246 goes into effect, expanding HSS recipients and creating funding tiers.

The Student Success Act goes into effect, fully funding HSS for 2019-21.

[2] The Student Success Act funds many other activities as well, providing roughly $1 billion a year for early childhood education and K-12 school improvement. It is larger than HSS and, unlike HSS, draws on a dedicated tax source: a new Corporate Activities Tax. Measure 98 did not increase funds collected by state government.

The COVID-19 pandemic continues to affect K-12 students and staff

The pandemic prompted an abrupt shift to online learning and increased chronic absenteeism. This increase has proved persistent long after schools resumed in-person learning; high rates of student absenteeism continue to affect schools in Oregon and nationwide. Declining enrollment and high inflation after the pandemic have contributed to budget shortfalls in some schools and districts. These shortfalls can reduce the availability of middle and high school programs.

During the pandemic, particularly the 2019-20 school year, ODE did not require districts to collect data for several metrics key to understanding the impacts of the HSS program. ODE also changed graduation requirements and the definitions of dropouts and regular attenders during the pandemic period, affecting analysis of HSS outcomes over time.

In spring 2020, ODE allowed districts to award credit to seniors who were passing classes at the time of the March 2020 school closures, which ODE officials said likely led to a spike in graduation rates that year. State policy decisions, including suspending a 10-day drop rule for students, depressed dropout rates in 2019-20 and 2020-21, then artificially increased them in 2021-22, when the agency reinstated the rules — as a result, rates for those three years cannot be compared to other years. Finally, according to ODE, attendance rates for 2020-21 are not comparable to rates in other years given changes in attendance rules tied to distance learning.

This is the third performance audit of the HSS program

Another requirement of Measure 98 was that the Secretary of State conduct performance and financial audits of the HSS program every two years, with deadlines for when each audit is to be released. This is the third performance audit of HSS. Financial audits are conducted separately.

The three performance audits conducted by our office to date took different approaches based on the maturity of the program, integration with other programs, and available audit resources.

- The first, issued in 2020, focused on the planning and early implementation of HSS: "[High School Success Planning Is Robust, but ODE Can Enhance Benefits of Measure 98 by Improving Monitoring and Analysis](#)."
- The second, issued in 2022, included follow-up on recommendations from the first audit and a review of the integrated guidance: "[ODE Continues to Effectively Implement Measure 98 and Increase Collaboration Across Agency Programs](#)."

This is the third performance audit issued by our office, but it is the first to assess HSS spending, the program's benefits for grantees, and its effect on student outcomes over time. The scope of the audit is complicated by several factors. While this audit considered outcomes based on years prior to integration, many other initiatives work towards improving those outcomes. Our recommendations for future improvements in reporting and monitoring aim to preserve the goals of HSS within the integration but may affect ODE programs beyond HSS.

Over the first six years of HSS, over 230 grantees reported spending roughly $760 million in HSS funds to establish and expand CTE offerings, college-level opportunities, and dropout prevention strategies. School district officials we spoke with emphasized the program's role in helping expand important activities.

We found high school performance and student outcomes have been mixed. The clearest evidence of HSS impact comes from the substantial expansion of CTE programs and student participation in CTE courses since HSS took effect. Other participation and outcome metrics show mixed results with ninth grade on-track unchanged since 2016 and college-going and regular attendance dropping sharply during the pandemic. Results were similarly mixed for focal student groups, a key state focus.

Oregon's graduation rates — once among the lowest in the country — grew overall and for focal student groups since 2016, but marginally. In 2021-22, Oregon still ranked 44th among states, similar to where the state ranked in 2016 when voters passed Measure 98. Changes to graduation rates and other high-level outcomes are difficult to attribute to specific HSS investments, in part because the HSS program makes up only 5% of total school funding and many other programs work towards the same goals.

We also found ODE has steadily improved its administration and monitoring of the HSS program, and the agency's eligibility reviews of grantees show promise for helping increase student success. Yet ODE remains largely focused on grantee compliance, with only limited analysis of program and grantee outcomes.

Two large-scale ODE efforts — integration of HSS and related grant programs and new district growth targets under the Student Success Act — could streamline compliance requirements for HSS recipients, increase accountability, and identify effective investments in student success. However, both initiatives are in the early stages and require improvements for successful implementation. As we noted in a 2022 systemic risk report, past K-12 reform efforts in Oregon have been abandoned, reinforcing the importance of seeing through full implementation of these initiatives.

HSS grants have helped expand programs and supports as envisioned in Measure 98

We evaluated spending from 2017-18 through 2022-23, the first six years of the HSS program, and found substantial investments in expanded CTE spaces and programs, dropout prevention staff and supports, and resources designed to help students better prepare for college and careers. All told, during that time over 230 districts, charter schools, and other specialty high schools reported spending $760 million in HSS funds for students in eighth through 12th grades. The expenditures primarily went to the three main areas identified in Measure 98: dropout prevention, CTE, and college-level opportunities, all anticipated to improve student success in high school.

Figure 2: About 80% of HSS funds went to dropout prevention and CTE in the first six years of the program

Other Activities 7.4%

Dropout Prevention, 42.6%

Career & Technical Education, 36.9%

College Level Opportunities, 13.1%

Source: Grantee spending reports for 2017-18 to 2022-23

From 2017-18 to 2022-23, staffing costs were about 63% of total spending. In 2022-23 alone, grantees reported funding about 1,200 full-time-equivalent staff with HSS funds.[3] The second-largest spending category was facilities and equipment, which accounted for another 18%.

Our review included confirming investments and grantee compliance with HSS statutes. To do this, we evaluated spending reports and planning documents from 20 school districts of varying sizes across the state that together accounted for one-third of total HSS spending. We visited six of these districts and corresponded with the remaining 14.

Substantiating district reporting

ODE does not check reported grantee spending against documentation, such as invoices, contracts, and payroll detail reports. We requested back-up documents or additional detail to support a small selection of reported spending or staffing in the 20 districts we reviewed. We did not find substantial problems with district responses to this limited request. While ODE could reduce the risk that spending may not be accurately reported by requesting supporting documentation, additional oversight needs to be balanced against the burden these requests can place on grantees. In our view, the agency could achieve that balance by requesting limited documentation from some grantees when spending questions arise or when grantee responses provide little detail to support reported high amounts of spending.

Our review found reported spending, including staffing costs, generally appeared reasonable and allowable. With several small exceptions, districts appeared to be using HSS funds to pay for programs and positions established after December 2016. That date, a statutory cutoff, was designed to ensure districts created new programs or expanded existing programs, rather than using HSS funding to replace existing funding.

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[3] This staff FTE figure is rounded to the nearest 100. Our review found grantee-reported staffing numbers are likely imprecise, though they generally appeared reasonable relative to reported staffing costs.

Administrative costs appeared generally in compliance with statutory caps from 2019-21 to 2022-23. We found 13 of approximately 230 grantees reported administrative expenses above the 4% cap for those years. In our judgement, the total dollars over the cap — $159,000 over four years we reviewed — were not material, comprising 1.2% of total reported administrative costs in that timeframe and less than 0.1% of total spending reported.

We also learned more about where HSS dollars were spent:

- **CTE**: Districts invested in construction of new facilities, facility upgrades, and new equipment, from welding equipment to flight simulators. They added staff to expand programs and add existing programs to more schools. In some cases, they expanded CTE through contracts with outside entities.
- **College-level opportunities**: HSS-funded staff included college and career coordinators and counselors. Districts funded a wide range of activities, such as picking up tuition costs for advanced courses, expanding Advanced Placement and International Baccalaureate offerings, and partnering with community colleges for dual-credit classes.
- **Dropout prevention**: Funding staff for ninth grade on-track or student success teams at high schools was a common use of HSS dollars. Funded personnel included attendance and graduation coaches, counselors and social workers, instructional specialists and transition staff to help 8th-graders move into high school. Grantees also funded summer school expansion, staff to use data to identify struggling students, and alternative school options.

District officials said HSS funding contributed to substantial improvements or helped them recover from pandemic setbacks, in combination with other funding. HSS requirements also appear to have protected some programs, including CTE programs, that might have been cut amid growing budget challenges.

Bend-La Pine School District
HSS funds have been "a major contributing factor in our rising graduation rates," district officials said. The funds also helped the central Oregon district increase attention paid to marginalized students, "which has multiple ripple effects throughout our schools." HSS funds paid for graduation coaches at each high school and helped increase CTE offerings.

Scappoose School District
District officials said HSS funds helped maintain graduation rates above 90% and increase the district's ninth grade on-track rate to above 90%. The district northwest of Portland hired a CTE teacher and an interventionist to work with students and support the goals of HSS. It also boosted college credit opportunities, with roughly 75 dual-credit courses available, officials said. For two straight years, if high school students stayed with the district, "we were able to graduate them on time."

Three Rivers School District
The southwestern Oregon district used HSS funds to pay for graduation coaches at each of its high schools, with a focus on building student relationships and on "not letting any student fall through the cracks," district officials said. That student support, aimed at keeping students on track to graduate, has helped the district increase graduation rates.

District officials also warned that declining enrollment and rising costs are squeezing budgets and could lead to cuts that reduce the gains made. A 2024 report from Oregon's Quality Education Commission

estimates the state would need to invest $11.3 billion in the 2025-27 biennium to maintain current practices and resource levels, but it would take an investment of an additional $2.3 billion — about 10% of K-12 funding from all sources — to achieve a system of effective schools.

Specific outcomes from HSS investments are difficult to determine with mixed high school performance since the measure passed

Student outcome data suggest CTE, college and career programs, and increased support for students can help boost student success. For example, students who participate in CTE courses have higher graduation rates, as do students who participate in accelerated learning and students who are on track to graduate by the end of ninth grade. However, student outcomes since HSS was implemented are mixed, in part because of wide-ranging pandemic challenges. Results for focal student groups, a key state focus, were also mixed.

These overall outcomes are imprecise measures of the HSS program's impact. HSS is one of many funding sources used to increase high school success, the HSS program was not fully funded in its first two years, and it is not large relative to total K-12 dollars. Pinning down statistically significant outcomes for the program is difficult, even in areas of strong overall performance.

Student outcomes show mixed results, with graduation rates and CTE measures rising and other important outcomes relatively flat or declining

We evaluated trends in student outcomes related to each of the three HSS areas: CTE, dropout prevention, and college-level opportunities. We looked at statewide and district outcome metrics emphasized by ODE, focusing on 142 districts with 2022-23 graduation cohorts of at least 25 students.[4] Figure 3 shows trends in student outcomes related to each category of HSS spending.[5]

Figure 3: Statewide and district results were mixed

Outcome metric	HSS Area	2016-17	Latest Result*	Trend	Districts Improving
CTE participation	CTE	62.1%	72.5%	Large increase	72%
CTE participant grad rate	CTE	86.3%	88.8%	Increase	61%
4-year Graduation rate	Dropout Prev	76.7%	81.3%	Increase	67%
Ninth grade on-track	Dropout Prev	83.4%	83.6%	Flat	51%
Regular attendance	Dropout Prev	80.3%	61.9%	Large decline	2%
Dropout/pushout rate	Dropout Prev	3.9%	3.3%	Improved	61%
College-going rate (2020-21)	College Ops	62.3%	55.6%	Decline	18%
Accelerated Learning (2021-22)	College Ops	34.3%	29.1%	Decline	20%

* 2022-23 school year unless otherwise stated. Source: Auditor analysis of ODE and Education Northwest data.

[4] Smaller districts are more subject to random fluctuations in trends.

[5] The dropout/pushout rate is the only metric where a lower percentage result is better. Regular attendance is based on attendance district-wide, not only in high school. Statewide, absenteeism rates are higher in kindergarten and first grade and across all high school grades. Percentages of districts improving are based on districts with at least 25 students in their 2022-23 graduation cohort.

The abrupt shift to online learning during the pandemic contributed to sharp decreases in ninth grade on-track rates, regular attendance, and college-going rates. Ninth grade on-track has since bounced back to pre-pandemic levels.

In our view, CTE provides the strongest outcome-based evidence for HSS program impact. HSS spending on CTE has a straightforward connection to a direct outcome — increasing CTE participation by expanding CTE spaces and offerings — and grant recipients reported spending $280.2 million to do so from 2017-18 to 2022-23.

ODE data and separate data from Education Northwest, an Oregon-based nonprofit, indicate CTE programs, CTE enrollment, and student completion of CTE courses have all increased substantially since 2016-17, holding steady even through the pandemic. This increased completion of CTE courses extended to students from historically underserved races and ethnicities, and also for students with disabilities, English Language Learners, and homeless students.[6]

Figure 4: CTE participation rates rose before and after HSS implementation
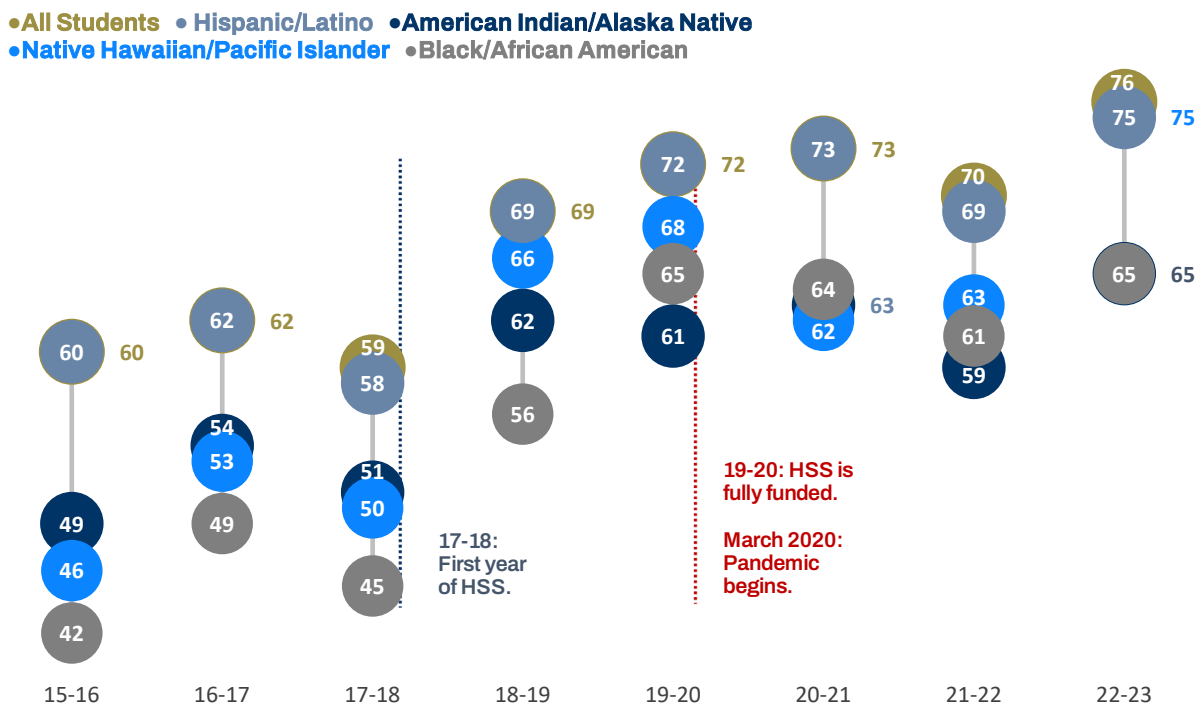
Source: Auditor analysis of ODE data.

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[6] Historically underserved races and ethnicities include four broad Census categories: Hispanic/Latino; Black/African American; American Indian/Alaska Native; and Native Hawaiian/Pacific Islander.

Figure 5: CTE participation rates also rose for other student focal groups
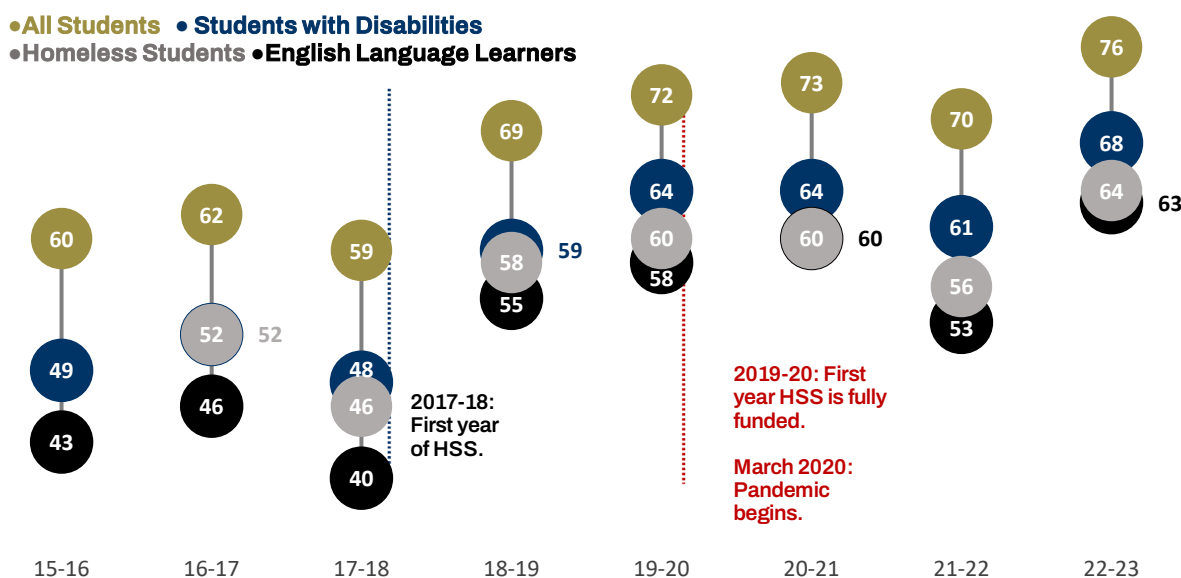
Source: Auditor analysis of ODE data.

Graduation rates for CTE participants, already high when the measure passed, rose through 2022-23, hitting 88.8% that year, well above the 81.3% district average.[7]

HSS funds are one way districts support dropout prevention efforts, and dropout prevention is directly related to four commonly used student outcomes. Among these four, trends were mixed, with some increasing and others staying flat:

Graduation rates improved the most from 2016-17 to 2022-23 (including a pandemic rule change that temporarily boosted rates in 2019-20). Graduation rates also rose for students with disabilities, English learners, migrant and homeless students, and for students across race and ethnicity, another encouraging development.

Despite these gains, Oregon's overall graduation rates remain low compared to the rest of the country.[8] In the latest national comparison, based on 2021-22 graduation rates, Oregon ranked 44th lowest overall, similar to the low ranking that helped spur the 2016 ballot measure.

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[7] It is important to note that the connection between CTE course completion and high graduation rates is a correlation — not a proven cause. It may be that students who complete CTE courses are more likely to graduate for reasons other than their participation in CTE.
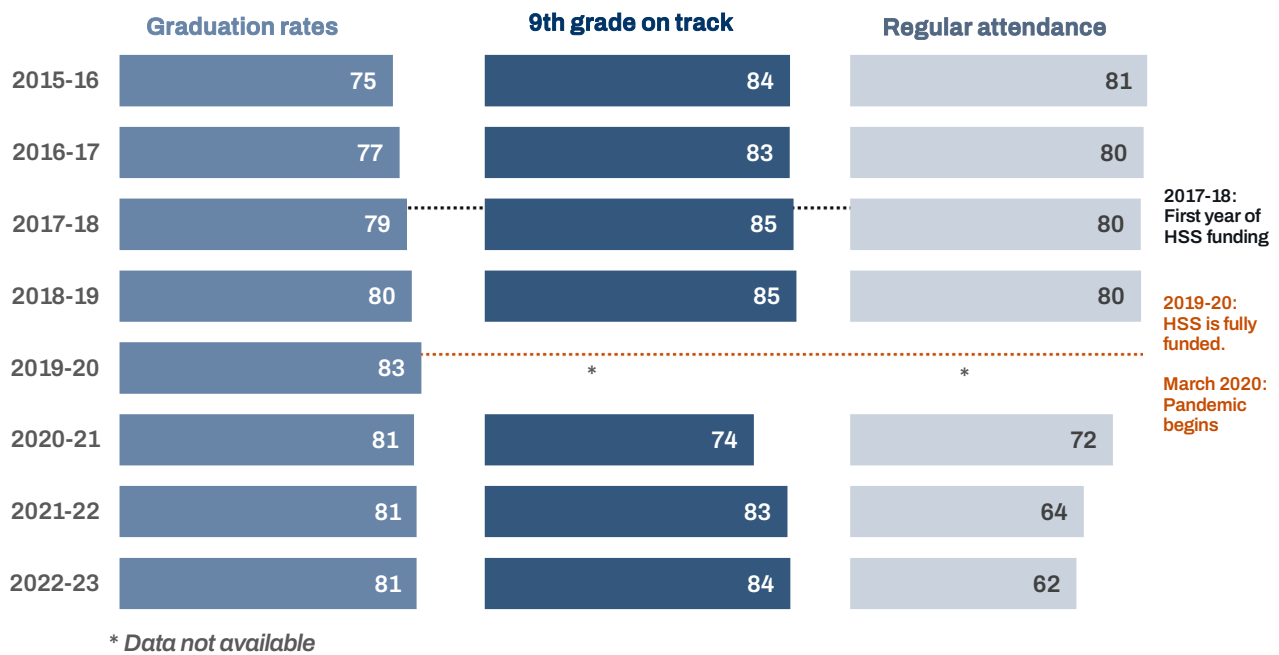
[8] In 2022, a legislatively required ODE report indicated Oregon's requirement of 24 credits to graduate was at the high end among states, a potential cause of lower ratings. If the required credits did affect graduation rates, core subjects were not the issue. Oregon's

Trends in **dropout/pushout rates** are less reliable because of pandemic-era rule changes, but in the end, improved — from 3.9% in 2016-17 to 3.3% in 2022-23.

Ninth grade on-track rates did not substantially change from 2016-17 to 2022-23, although the statewide rate did bounce back from an alarming pandemic dip.

Regular attendance — defined as students present for more than 90% of the days they were enrolled — dropped sharply after the shift to online learning during the pandemic and has not recovered.[9]

Figure 6: Graduation rates grew, on-track rates were flat, and regular attendance fell sharply

	Graduation rates	9th grade on track	Regular attendance	
2015-16	75	84	81	
2016-17	77	83	80	
2017-18	79	85	80	2017-18: First year of HSS funding
2018-19	80	85	80	2019-20: HSS is fully funded.
2019-20	83	*	*	March 2020: Pandemic begins
2020-21	81	74	72	
2021-22	81	83	64	
2022-23	81	84	62	

* Data not available

Source: Auditor analysis of ODE data.

District administrators point to the COVID pandemic as a unique disruption to many measures of student achievement, including attendance. Students and parents increasingly see attending school as optional, they said. Students have more access to online courses and materials, which can be completed quickly, and some administrators told us social anxiety has risen leading more students to avoid school.

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required three math credits were middle of the pack, with 17 states requiring four or more credits, as were the three credits required for both social studies and science. Almost all states, including Oregon, required four or more English credits. However, the state's requirement of one credit each for physical education and health was relatively high, as was Oregon's combined three credits for CTE, arts, and world language courses. The report did not analyze how the six remaining required credits, which can include electives, compared to other states.
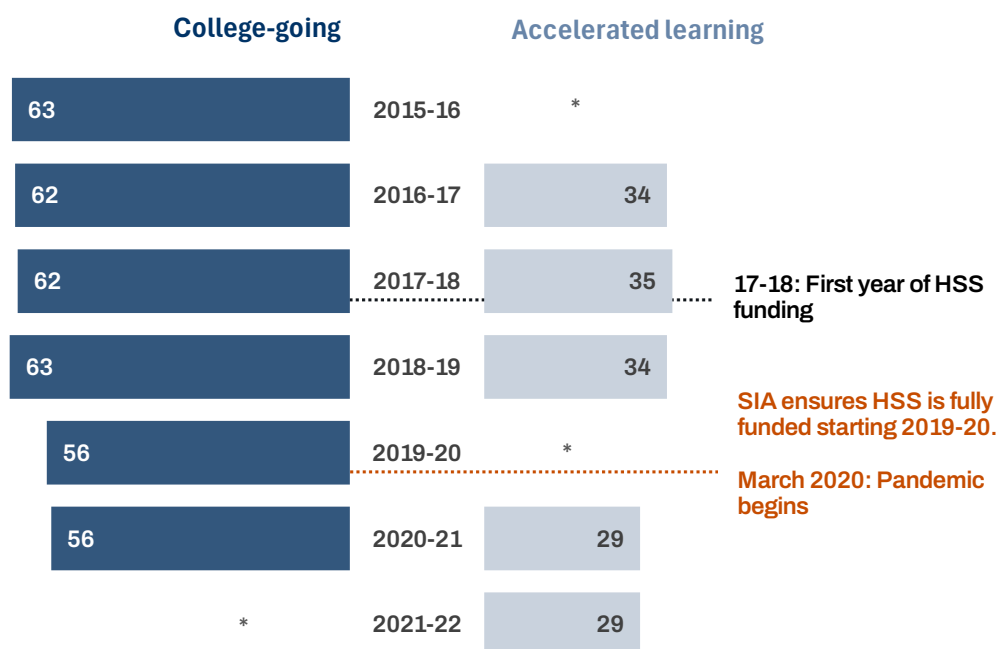
[9] ODE changed graduation requirements and the definitions of dropouts and regular attenders during the pandemic period, affecting analysis of HSS outcomes over time. State policy decisions, including suspending a 10-day drop rule for students, depressed dropout rates in 2019-20 and 2020-21, then artificially increased them in 2021-22, when the agency reinstated the rules — as a result, rates for those three years cannot be compared to other years. Finally, according to ODE, attendance rates for 2020-21 are not comparable to rates in other years given changes in attendance rules tied to distance learning.

District officials describe investing in community-building activities, engagement staff, and extracurricular activities, as well as emphasizing CTE electives, as ways to proactively increase attendance. Several officials said changes to state truancy law in 2021 have made it more difficult to keep kids coming to school by removing pressure on parents.[10] Others recommend educating families statewide on why in-person attendance is important for future success.

Metrics assessing college-readiness, meanwhile, have dropped.

We analyzed college-going rates and participation in accelerated learning.[11] College-going rates measure how many students attend college within an academic year of graduating high school, while accelerated learning is a broad category that includes Advanced Placement and International Baccalaureate courses, dual-credit courses offered through partnerships between high schools and colleges, and other forms of advanced learning that give students a chance to earn college credit while still in high school.

Figure 7: Students are going to college and participating in accelerated learning at lower rates

College-going		Accelerated learning
63	2015-16	*
62	2016-17	34
62	2017-18	35
63	2018-19	34
56	2019-20	*
56	2020-21	29
*	2021-22	29

17-18: First year of HSS funding

SIA ensures HSS is fully funded starting 2019-20.

March 2020: Pandemic begins

* Data not available. Source: Auditor analysis of ODE and Education Northwest data

However, our analysis in this area was somewhat limited — data is not available in key years for both metrics, with college-going rates particularly dated. Our accelerated learning participation rates exclude Regional Promise, a program eliminated in 2020. Regional Promise data provided by Education Northwest is generally limited to three school years: 2016-17, 2017-18, and 2018-19.

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[10] The changes, enacted through Senate Bill 817 in 2021, ended the practice of referring families to the judicial system for irregular attendance in public schools.

College-going rates are also down nationally since the pandemic; in 2020-21, Oregon ranked 36th among states.[12] Among other factors, district administrators attribute declining college attendance to escalating costs, students' reluctance to take on debt, and students' need to work to support themselves or their families. Students are also increasingly skeptical about the future financial benefits of completing college, particularly when jobs that do not require college degrees — such as electricians and other trades, some sales and health care jobs, police officers, flight attendants, and entrepreneurial work — can pay relatively well.

Another metric for high school effectiveness in preparing students for college is the need for recent high school graduates to take remedial or developmental math and English classes in college. In 2023, Oregon's Higher Education Coordinating Commission reported the percentage of recent Oregon high school graduates taking developmental courses in Oregon community colleges dropped from 2016-17 through 2021-22, with a particular drop in developmental math enrollment. However, the colleges have been implementing "corequisite" models for math that place students in college-level classes with extra support, instead of placing them in developmental courses. This shift is expected be more effective for students needing to develop college-level skills, but it makes remedial course enrollment rates a less reliable measure of how well high schools are preparing students for college. Also, the commission reported that the percentage of recent Oregon graduates enrolling in college-level writing actually declined since 2016-17, while enrollment in college-level math was flat.

Statewide trends in outcomes and gaps for key focal student groups are also mixed, with some gaps remaining alarmingly high

Improving outcomes and closing "opportunity gaps" — in our analysis, the difference between results for focal student groups and the results for all students — are important goals of the HSS program and the K-12 education system in general.

To analyze progress in this area, we primarily focused on students identifying as Hispanic/Latino, Black/African American, American Indian/Alaska Native, or Native Hawaiian/Pacific Islander, students with disabilities, students who have been English Language Learners at some point in high school, and, when data was available, homeless students.

According to ODE data, CTE participation rates and graduation rates rose for all of these groups, often substantially, and gaps narrowed for all the groups on graduation rates. Gap closure was more mixed on CTE participation, though every group saw double-digit increases in CTE participation from 2016-17 to 2022-23. Education Northwest data on participation rates, calculated with a different methodology, also showed substantial increases and mixed results on gap closure for these groups.
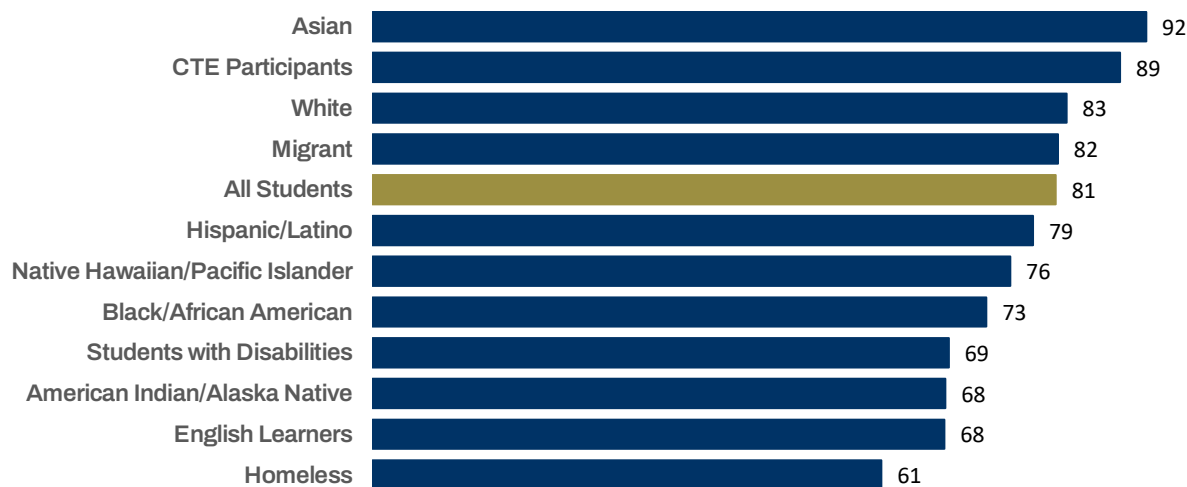
Conversely, regular attendance rates, college-going rates and accelerated learning rates fell for each of these groups, often substantially. Gaps in regular attendance rates widened in every case — a challenge

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[12] The national data, from the National Center for Education Statistics, focuses on 18- to 24-year-olds enrolled in degree-granting institutions, a different population than ODE's college-going metric which focuses on recent high school graduates. The NCES data misses a "shrinking but non-trivial" percentage of college-going students, such as those from some for-profit institutions, which can understate enrollment.

to progress on equitable outcomes — and widened for all groups but English Learners for college-going rates.

Hispanic/Latino students had relatively high graduation and ninth grade on-track rates in 2022-23. Black/African American students had relatively high college-going rates, while English Learners had relatively high regular attendance rates, followed closely by Black/African American students.

Figure 8: Large gaps remain in graduation rates in 2023

Group	Rate
Asian	92
CTE Participants	89
White	83
Migrant	82
All Students	81
Hispanic/Latino	79
Native Hawaiian/Pacific Islander	76
Black/African American	73
Students with Disabilities	69
American Indian/Alaska Native	68
English Learners	68
Homeless	61

Source: Auditor analysis of ODE data.

Many gaps in 2022-23 remained alarmingly high, even when they did fall relative to 2016-17. Gaps still hit double digits on multiple metrics for students identifying as American Indian/Alaska Native, Native Hawaiian/Pacific Islander, students with disabilities, and homeless students. In 2022-23, outcomes for homeless students, who accounted for 8% of the state's graduation cohort that year, were 20 percentage points lower than the all-student average for graduation rates, ninth grade on-track rates, and regular attendance.

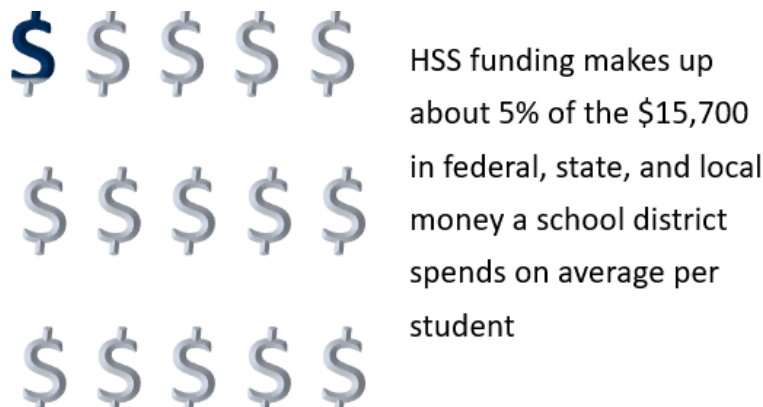## Determining the HSS program's specific impact has been difficult

To gauge the effect of HSS, we compared 15 measures of district-level HSS spending against changes in district outcomes since 2016-17, the year before HSS funding began, and found no moderate or strong correlations. Correlations were weak for changes in graduation rates, CTE participation, ninth grade on-track, dropout/pushout rates, and regular attender rates. Correlations were also weak for college-going rates, though the college-going information is dated, with the most recent available for 2020-21.[13]

Several factors could explain these results. The pandemic had a strong negative effect on some outcomes, complicating trend analysis. Districts and high schools also rely on multiple funding sources, including

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[13] Correlations with district-wide childhood poverty were much stronger, reaching moderate levels for graduation rates, college-going rates, and participation in Advanced Placement and International Baccalaureate courses. These negative correlations indicate districts with higher proportions of low-income families generally have lower results on these metrics.

state, federal, and local funding such as property taxes, making the HSS grant's impact more difficult to tease out.

The HSS program, while substantial, is also a relatively small portion of a district's overall budget. Fully implemented, the HSS program provides about $800 per student, compared to the roughly $15,700 Oregon districts spent per student in 2021-22.

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HSS funding makes up about 5% of the $15,700 in federal, state, and local money a school district spends on average per student

A University of Oregon research team used a more targeted approach to evaluate HSS impacts. Working with ODE staff, they ranked implementation of ninth grade student success teams at 277 schools: "Student Success Teams and On-Track to Graduation Status in Oregon: An Interrupted Time Series Analysis." The authors analyzed whether schools that implemented the teams more intensively had greater improvement in ninth grade on-track rates than those that did not, but they found no statistically conclusive results. They also noted the pandemic's negative effects on outcomes make it more difficult to assess HSS impacts. The authors may update the study with 2022-23 results.

District successes highlight the potential for high school improvement

During this audit, we found no districts with graduation cohorts of 25 students or more that improved across all metrics since the HSS program took effect. However, many districts improved in one or more important areas, including several districts we visited during the audit. Leaders and staff in these districts told us HSS investments, combined with other funds, have contributed to increased student success, including helping districts rebound from pandemic-related decreases.

### CTE participation grew rapidly at Woodburn High School

Officials in the Woodburn School District, a majority Latino district, opted to invest heavily in CTE. The district reported using about 60% of its HSS funds from 2017-18 to 2022-23 to invest in CTE — specifically, a new CTE wing at the high school, new and upgraded equipment, classroom supplies, and more student opportunities at the Willamette Career Academy, a regional center operated by the Willamette Education Service District. Students also have the option to take CTE courses at a nearby community college as part of a partnership with the district.

The investments paid off. CTE participation rose 40% from 2017 to 2023, among the highest increases in the state. When auditors visited the high school, students said CTE courses helped to connect them with school. Shawn Delay, an engineer who left industry five years ago to teach, offered a tour of the

engineering lab. We observed engineering students learning the basics of computer-aided drafting, solid modeling, and robotics. Several were eager to show us complex 3-D printings they made.

CTE offerings cover a wide range of student interests. Computer science courses introduce programming languages such as C++, Python, and Java. Graphic design courses provide experience with Adobe Photoshop and Illustrator. Students can take career-specific courses, such as Emergency Medical Technician training through dual-enrollment with Chemeketa Community College.

Investments in new CTE space and equipment at Woodburn High School, such as this new 3D printer in the school's engineering lab, helped the district increase students' CTE participation by 40% from 2017 to 2023. The High School Success program emphasizes CTE investment, in part because participants tend to graduate at significantly higher rates. CTE courses can also help students better connect with school.
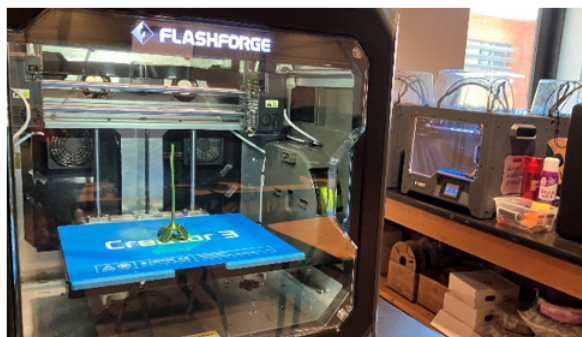
3D Printer in the high school's engineering lab.

"I got a job through the CTE program," said one student guiding our tour of the school, a junior at the time. "It's hard to get a job unless you have experience."

Woodburn continues work to improve attendance and graduation rates. Students and district officials think CTE programs can help improve those outcomes as well.

"You can spend billions of dollars on school, but it doesn't force anyone to go," said another junior leading our tour. "You need to motivate students. [CTE and dual credit courses] keep them motivated because they have a goal and are working toward it."

Salem-Keizer's CTE participation rose after investments in their Career Technical Education Center and CTE programs at individual schools

The Salem-Keizer School District spent nearly three-quarters of its HSS dollars on CTE and saw CTE participation grow from 61% of the 2016-17 graduating class to 80% of graduates in 2022-23. Combined with funds from a 2018 voter-approved bond, the money helped fund programs at individual high schools as well as staffing at a central Career Technical Education Center.

The center offers a wide range of programs, including construction, manufacturing, biotechnology and medical science, cosmetology, behavioral health, and aviation. The district provides transportation and has eliminated student fees to make the center more accessible to students whose families face financial hardship. HSS provided funding for teachers, supplies, and new equipment, including flight simulators for the district's CTE aviation program.

The district still has challenges, including a low regular attendance rate in 2022-23. District administrators and teachers say CTE can help connect students to school and drive student success; graduation rates for CTE participants hit 89% in 2022-23, and over 95% for more intensive CTE concentrators.

A full-motion professional flight simulator at the Career Technical Education Center

The aviation program, housed in a 16,000 square foot facility at the Salem Municipal Airport, is one of few high school programs in the nation to offer career pathways in piloting, aircraft maintenance, and drones. Administrators intend for this program to diversify the aviation industry and remove barriers to access. Students in the program use industry-standard flight simulators to log their flight hours toward certification, partner with local aviation professionals and mentors, and complete the FAA written examinations for piloting and drone licensure.

Teachers and administrators at the Career Technical Education Center emphasized how important these programs are for students who face adversity, and provided examples of students leaving programs with professional certifications and competitive job offers in their fields of choice. A new behavioral health program aims to address staff shortages in Oregon's behavioral health system. It also focuses on building students' life skills, provides mentorships, and seeks to build connections, with students in the program reporting a higher sense of belonging than at traditional high schools. Behavioral Health Instructors Erin Dannecker and Scott Filley said some of their students, if not connected to the center, would be at risk of being lost in a traditional high school model.

Salem-Keizer also used HSS funds to bolster existing programs, like the center's construction program. Before Measure 98 passed, students in the first year of the construction program focused on constructing sheds. The center has since expanded the first-year construction program to focus on home design, residential code, and hands-on tiny home construction including electrical, plumbing, and interior finishing. As seniors, students build an entire home in a local neighborhood. Some students become licensed building code inspectors before they receive their high school diplomas.

The Career Technical Education Center has heavily expanded their construction program

The Career Technical Education Center continues to expand its programs, including through collaboration between programs. For example, students in the construction program are building therapy practice rooms and offices for the school's behavioral health program.

Parkrose High School used success teams to boost ninth grade on-track rates

Since the HSS program began, Parkrose High School increased ninth graders on-track to 86%, above the state average, with double-digit growth during a time when growth statewide was flat.

Officials at the diverse district in Multnomah County have focused on a ninth grade on-track success team, which aims to ensure that students have a quarter of their required credits by the end of their first year of high school. In practice, that means building strong relationships with students through a team of administrators, teachers, counselors, and five on-track coordinators funded through HSS. The team also draws on district contracts with culturally specific mentor groups that can connect with students.

"We talk about what steps have worked with the student, and who has strong relationships with the student that we can build on." said Jessica Burbach, a math teacher and the ninth grade on-track lead.

The on-track coordinators focus on building relationships and act as go-betweens for students and teachers, helping to remedy problems. The full ninth grade success team meets regularly to discuss individually tailored student supports that can help students succeed. Assistant Principal Kenneth Keys works with the rest of the team, tracking data on how students are doing in class and working to build better connections with incoming eighth graders. The team can also connect students with mentors and mental health support.

One student, now a sophomore, had low grades and attendance because of what he was going through outside of school, but said the ninth grade on-track team connected him with the on-track coordinator and the non-profit Latino Network.

Keys started meeting with the student's parents every week, shifting to monthly meetings as he connected more strongly to school.

"At first I didn't accept nothing – I didn't want to take the help. In the first [semester] I was failing all my classes. In the second semester I got help from [Assistant Principal Kenneth Keys], from the on-track coordinator, and Latino Network. The coordinator helped me a lot. He helped me pass my classes in freshman year."

Parkrose High Student with ninth grade on-track team members Jessica Burbach, Kenneth Keys, and Gabe Gothro

Parkrose's graduation rates have not risen compared to 2016-17 but have risen in recent years. Research indicates keeping students on track early on can be an effective strategy to boost graduation.

"I hope that the kids will find out what they're passionate about and go on to be successful in life," Keys said. "Not having a diploma is an unnecessary barrier to that. My worry is we will lose track of them. There's all this stuff going on at home. They just disappear. I worry about what happens to them when they're not here."

Graduation rates for Native American students in the Jefferson County School District have risen substantially

In 2022-23, the Jefferson County School District had the largest graduation cohort of Native American students in the state. Those students also graduated at a rate of 79% in 2023, a dramatic increase from just 54% in 2016-17.

District reports indicate the HSS program helped fund teachers and staff for CTE, dropout prevention, and their Future Center, which offers college and career information and one-on-one mentoring services tailored to some focal student groups, including Native American students. With the help of other funding sources, the district has also hired a Tribal student liaison and graduation coaches focused on indigenous students.

At Madras High, where roughly a third of students are Native American, both the Tribal student liaison and the college and career coordinator help juniors and seniors plan their next steps. Students who want to jump straight into the workforce have told the school's Tribal student liaison they are interested in construction or firefighting, and others might work at the Tribe's casino or the Kah-Nee-Ta Hot Springs Resort on the Warm Springs Reservation.

The Native American student center at Madras High School is a space where students can get support and build community

The graduation coaches have also worked with students and families on increasing attendance. Native American student attendance rose from 79% to 89% in the first semester of the 2023-24 school year, district officials said. Tony Summers, principal at Madras High School, attributed the district's

improvements to targeted support. "Having full time staff who can focus on specific groups is pivotal," he said.

Q and A: A Front-Line Perspective on Student Success

At Pilot Rock Jr/Sr High School in rural Umatilla County, seniors wanted more post-secondary advising than their academic teachers could offer. In late 2022, the district used HSS funds to hire education veteran Aaron Umpleby as a success coach for the school's 150 students. In 2023, all of the students in the district's graduation cohort graduated on time.

Q: What is the best thing about being a student success coach?

When you can look a student in the eye and see their personal inward drive come alive. They realize they have purpose, they can accomplish more than they thought, or more than their peers, teachers, and sometimes even parents have realized.

Q: How has Pilot Rock created a culture of post-high school success?

Through our ASPIRE, GEAR UP, and AVID programs (designed to improve career and college readiness) we work with every student to help them achieve a personal success plan. Students are taking classes they are interested in and they are performing well with increased rigor. We also coordinate college and career field exploration days, giving many students a new desire through exposure they otherwise would not have been given.

Q: How can we better prepare students for the workforce?

It starts in each class. By being consistent and helping students succeed with soft skills, like being on time and communicating with their teachers, they learn skills that help prepare them for the workforce. CTE classes also help equip them for the workforce.

Q: How can we better prepare students for college?

This is an opportunity for growth. We are working to increase our rigor and expectations at every level in all classes. We are also looking for opportunities to help more students begin college classes while in high school, which prepare them for college success.

Q: How can the state better support students' transition into the workforce and college?

A big question. We need to support students and teach them how to make decisions that will take them closer to their preferred future self. The state's graduation requirements for classes like personal finance help each student with training and life skills. But we also need to ensure that each class is rigorous and supported well by administration and staff. I would love to see local districts have the flexibility to include more CTE training pathways in secondary education plans and have the financial support to bring new opportunities to small rural communities like Pilot Rock.

ODE's HSS program monitoring and eligibility reviews have improved, yet analysis of program performance remains limited

Over three performance audits, we have seen staff in ODE's Office of Education Innovation and Improvement focus regularly on making improvements, drawing on feedback from grantees and their own experiences. ODE has made improvements in the forms they ask HSS grantees to submit, in the guidance they provide, and in the intensity of grantees' connection with ODE and community partners.

ODE staff review grantee plans, budgets, and spending and help grantees understand what is allowable with HSS funds. The agency's regional teams intentionally build relationships across the state, helping connect school district staff with needed supports. The agency also consistently focuses on equity.

Overall, ODE's eligibility reviews of HSS grantees stand out as a potential strength, while the agency's limited review of HSS program and grantee outcomes was an important deficit.

Eligibility reviews can help foster student success

ODE's grantee eligibility reviews stood out to us as an example of positive direct intervention. Despite a lack of consistency in ODE staff notes from these reviews, some showed promise for helping promote district practices that benefit students.

In late 2020, ODE staff began reviewing eligibility for all HSS grantees. These statutorily required reviews focus on important practices that can increase equity and improve student results at high schools, such as ensuring at-risk students stay on track to graduate. The eligibility requirements were included in statute to improve students' progress toward graduation beginning with grade 9, increase the graduation rates of high schools, and improve high school graduates' readiness for college or career.[14]

> **To be eligible for grants, HSS grantees must:**
>
> - Provide time for staff to review student grades, absences, and discipline by school and course;
> - Identify and implement strategies to ensure at-risk students stay on track to graduate;
> - Use evidence-based practices for reducing chronic absenteeism in grades 9 through 12;
> - Ensure that high school students — including English Language Learners — are taking courses required for on-time graduation; and
> - Assign high school students to advanced and dual-credit courses based on academic qualifications in order to avoid bias in course assignments.

After districts complete a self-evaluation, ODE staff meet with them to discuss strengths and areas for improvement. Beginning in the 2021-23 biennium, grant recipients that did not meet eligibility requirements after initial ODE recommendations were placed on corrective action plans, which allowed ODE to direct a portion of HSS funding toward that goal. In 2021-23, 40 of 224 grantees were placed on corrective action plans. Thirty-two of them reported spending HSS funds to address the corrective action plans, though in relatively small amounts totaling about 1% of reported spending for the biennium.

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[14] ORS 327.883

The reviews are intended to be part of an ongoing improvement framework, yet school district officials we heard from expressed mixed opinions on their effectiveness. One district administrator said eligibility reviews were too broad to be helpful, and another called the process cumbersome. However, officials at one rural district said the review helped them develop more of a growth mindset. Officials at a large urban district said ODE provided clear feedback that allowed the district to comply with eligibility requirements.

To gauge the impact of ODE's eligibility reviews, we looked at documentation from eligibility meetings for the 20 districts chosen for our spending review. ODE's notes for seven of the districts lacked detail or indicated minimal focus on low student outcomes. In 13 of the districts, the reviews appeared to be thorough. In some cases, ODE staff recommended actions in areas the districts still needed to work on, and we saw grantees addressing potentially significant shortfalls during the review. For example:

- A rural district added collaboration time for teachers into their schedules and began the district's interventions with struggling students.
- A large urban district developed a districtwide approach to tracking attendance.
- ODE staff worked with staff in one small district on a corrective action plan to re-direct funds to a tutoring center that supports students enrolling in advanced coursework.

While ODE focuses eligibility reviews on whether districts have systems in place, they do not have a process to determine whether systems are effective once they have been established.

ODE's review of HSS program and grantee outcomes is limited

The most substantial deficit we saw in ODE's process was the agency's limited monitoring of HSS program outcomes.

ODE required grantees to report on HSS goals. Grantees set and reported on more than 1,200 goals overall, making it difficult for ODE staff to meaningfully track or assess. In addition, grantees' reporting provided limited insight on HSS program success. In 2022-23, grantees told ODE they had made progress on nearly two-thirds of the goals and met a quarter of them. However, not all grantees provided data to support the outcomes they reported, reducing the validity of the reporting. Grantees also reported no results for nearly 10% of the goals. It is also not clear if ODE is evaluating or using this reporting for grant management.

In general, ODE has not taken a systemic approach to monitoring or reviewing the HSS program as a whole, instead focusing on monitoring individual districts and grantees. One consequence is the agency is less able to report in detail on how the HSS program has met its goals, six years after the program began.

ODE has also not identified and evaluated HSS program outcomes or used information gathered from districts to identify successful strategies for increasing student success. Interviews indicated some Education Service Districts are emphasizing effective HSS practices with their regions, but ODE has not yet done this statewide, though the HSS statutes emphasize implementing strategies for school districts to share best practices.

ODE must ensure effective implementation of program integration and new district growth targets to help increase student success systemwide

In 2019, the Legislature passed the Student Success Act, which provided more funding for education and initiated two changes with the potential to improve performance in all grades.

- **Program Integration**: The Legislature required ODE to look for ways to simplify the grant system. The agency has responded in part by consolidating grantee applications, budgets, financial and performance reporting, and monitoring for nine grant programs, all of them important to school improvement. Among those grant programs are HSS, a new statewide early literacy program, federal CTE and Title I school improvement programs, and the Student Investment Account passed as part of the Student Success Act. All told, the integrated programs account for more than $1.5 billion in planned spending in the 2023-25 biennium, including $1.1 billion for the Student Investment Account and $325 million for HSS. Grant integration has the potential to streamline compliance requirements for districts and allow the districts and ODE to spend less time on grant compliance and more on increasing system performance.

- **District growth targets**: The Student Success Act also prompted ODE and districts to jointly create "Longitudinal Performance Growth Targets" (LPGTs) for Student Investment Account grantees to track district progress on five key student outcomes, ranging from third-grade reading to graduation. These targets and other performance review measures, including continued HSS eligibility reviews and corrective action plans, can help ODE both increase accountability and identify effective investments in student success. However, HSS grantees who do not also receive Student Investment Account funds are not required to set LPGTs, and only districts receiving HSS funds are required to participate in HSS eligibility reviews and related corrective action plans.

These initiatives have promise, but could be derailed by ineffective implementation, as the state has seen with other K-12 reform efforts. Five years after the Student Success Act passed, both initiatives are still in the early stages, in part because of pandemic delays.

Accountability does not have to include punishing districts with low results, part of the path taken by the federal No Child Left Behind Act of 2002. At the state level, accountability requires ODE to verify how program funds are spent, determine whether funded activities benefit students, identify and share successful strategies, assist struggling districts, and report program performance and challenges to policy makers.

As HSS has been integrated with other programs with complementary goals, improvements to ODE's accountability processes will affect programs beyond HSS. It is too early in the integration process to know whether the changes will be effective, but past challenges with HSS can help inform future recommendations. We reviewed the application, budgeting, and reporting process for integrated grants and all district LPGT submissions for the 2023-25 grant cycle, including related notes by ODE review teams to understand how the new monitoring processes will affect HSS recipients. Our analysis found ODE can take four steps to increase the likelihood of success, learning from drawbacks in HSS progress reporting and building on progress the agency has made so far. In sum, ODE can do more to:

- Streamline administrative requirements for districts;
- Ensure it can determine why district strategies worked or did not;
- Foster statewide discussion of effective practices; and

- Provide meaningful reporting to policymakers and the public.

> **_Oregon has not sustained past improvement efforts_**
>
> As our office noted in its 2022 report on systemic risks in K-12 education, Measure 98 and the Student Success Act together comprise Oregon's fourth major K-12 improvement effort since the 1990s. The key reforms of the previous three — the Oregon Educational Act for the 21st Century in 1991; the Oregon Investment Board in 2011; and the Chief Education Office that eventually replaced the board — were all abandoned.

ODE can do more to reduce burdens on districts receiving HSS funds

ODE's program integration and consolidation is a strong start, and ODE's formation of the Office of Education Innovation and Improvement put more efforts under one department. Even so, the agency, with help from the Legislature and the State Board of Education, needs to standardize reporting systems and streamline district requirements across more grants and initiatives. Doing so could streamline school district workload and foster a sharper state and district focus on student outcomes, but integration of additional grants without standardizing compliance and reporting requirements could introduce more administrative burden. ODE may need help from the Legislature and the State Board of Education to do so.

District frustration with ODE monitoring stems in part from substantial requests of school districts tied to multiple grants, each with unique compliance requirements, and from more than 50 student data collections. The danger for system improvement is that well-intentioned reforms can become checkbox exercises for overloaded districts.

During this audit we asked district officials about the impact of ODE report integration. While some appreciated the intent behind consolidation, many remain frustrated by inefficient and redundant documentation requirements. In the HSS program, some district administrators said they were not sure how ODE reviewed the reporting or used it to improve performance. Reporting requirements were also the same for all HSS grantees, regardless of size, a particular concern for small districts with few administrative staff.

ODE has addressed some of these concerns as part of the integration process. For instance, the agency consolidated more programs, simplified application forms for smaller districts, and reduced the amount of reporting for districts. Other concerns are difficult to address. ODE cannot override federal grant requirements or state statutes, and the student data the agency collects are important for system accountability.

However, the ODE grant process has more opportunities for streamlining. We saw two issues that contribute to district overload that ODE, the State Board of Education, and legislators could better address.

The first is ODE's use of multiple reporting systems. Grantees submit spending requests to a central grant database and submit extensive reports on planning, budgets, spending, and progress through a separate, spreadsheet-based system that was developed for HSS and expanded to include other programs. This approach means districts have to navigate different systems, which can change as new grants are established. Some reporting has been standardized across more grants as part of the integration process,

but opportunities exist to further consolidate reporting. For example, Washington uses a centralized grant management system for submission, reporting, and review.

The second issue that could be addressed is the number of grants, each with specific requirements. Our 2022 report on systemic risks in the K-12 system noted ODE administered more than 108 state and federal grants, with new grants and initiatives added each legislative session — including 22 in the 2021 legislative session alone.

The Legislature sets specific requirements for each new program, and the State Board of Education adds more through administrative rules. ODE officials note reporting requirements for grants and initiatives are often introduced without a built-in sunset, and they stay in place even as new programs are created. Requirements set in statute or rule are not easily changed if they prove cumbersome, redundant, or not useful to school improvement efforts. Federal programs also come with their own rules which cannot be changed by ODE or the Oregon Legislature.

The cumulative requirements significantly increase reporting burdens and require districts to work with different ODE personnel overseeing different grant programs. A significant part of ODE's monitoring focuses more on process and compliance than on student outcomes due in part to this complexity.

ODE has worked with the State Board of Education to find some opportunities to simplify. The Legislature can do more to consolidate requirements and revisit statutes and rules that are not generating useful information. It can also do more to ensure new grants and initiatives do not add unnecessary administrative burdens.

ODE should ensure it can determine whether district strategies are working

Districts that receive funds from the Student Investment Account — the biggest dollar item in the Student Success Act of 2019 — are required to develop long-term and interim growth targets for student outcomes, collectively known as LPGTs. ODE plans to use these targets as part of their integrated monitoring system to help improve student outcomes, including outcomes for focal student groups, expanding its focus beyond the performance of single grants. Districts that receive both HSS and Student Investment Account funds will participate in this process. Districts that receive HSS funds, but not funds from the Student Investment Account, are not required to participate but may benefit from doing so.

LPGTs and Progress Markers

Districts that apply for Student Investment Account funds and enroll more than 80 students must report performance on five common metrics: Four-Year Graduation, Five-Year Completion, Ninth Grade On-Track, Regular Attendance, and Third Grade Reading. ODE works with districts to determine how much progress to expect on each measure.

Districts must report two sets of performance improvement targets each biennium: one for all students and another for a combined group of focal students. Targets must reflect continuous improvement each academic year. Districts can also set locally specific targets at their discretion, such as reducing teacher-to-student ratios, increasing student club offerings, or improving performance on other metrics. The process includes both expected goals and higher "stretch" goals.

ODE also asks districts to report on 15 "Progress Markers," or practices that should help increase student success. The practices center on family engagement, equity and inclusion, curricular innovation, and data-driven decision making. Districts self-report their progress on markers they select. Unlike ODE's review of eligibility requirements in the HSS program, ODE officials say they do not see the markers as part of a district accountability system.

Districts and ODE staff co-developed targets for the 2023-25 biennium in Summer 2023 and have begun submitting reports on progress. Getting district administrators, school boards, and ODE staff to jointly agree on these common performance goals is a big step forward and holds substantial potential for improving the system.

The growth targets start at a good point and ODE is close to building a system that can spotlight ground-level successes and challenges. The targets clearly quantify expected results for five global outcomes in a way that can be tracked. Districts identify related strategies and activities and tie them to their requested budget and reported spending and staffing.

However, LPGT growth targets do not provide information about some critical HSS goals, including improving CTE and accelerated learning participation and college-going rates. These may be included in a district's additional goals but are not required, leaving a potential gap in HSS program monitoring.

District reporting also relies heavily on non-standardized narratives to make the link between planned activities and expected outcomes. These narratives are difficult to aggregate and lack quantifiable data, as was the case with the HSS goal reporting. In our review of LGPT setting, we found some districts estimated expected growth and detailed specific spending on staff and programs they felt would generate that growth. Other districts estimated future performance with little support or rationale, because that documentation is optional.

There is also no requirement that districts establish baseline data or identify quantitative measures other than LPGTs when setting goals, strategies, or related activities as part of the budget process. The integrated application and district reporting rely on narratives, and annual reports for the 23-24 academic year include only two questions: reflect on overall progress and reflect on challenges encountered. To reduce reporting burdens, each question asks districts to discuss "at least one outcome." The result is a partial description of district progress that complicates analysis of the program's effectiveness.

The missing step is to ensure all districts connect planned activities — such as adding staff to ninth grade success teams or expanding CTE programs — to an expected increase in growth targets, or a quantifiable interim goal. By doing this, the districts and ODE could identify which strategies worked, which did not, and why. This step is a crucial aspect of accountability and system improvement.

ODE plans to review the first round of growth target analysis to see how districts met targets. Part of that review will include a 90-minute discussion with each district. However, it is not clear the current system, with its lack of required detail, will collect the information needed for that process to work. High district turnover can make it difficult for new officials to explain the results of past activities, particularly when documentation is scarce and baseline data on staffing or outcomes was not documented from the beginning. Adding a requirement that districts include some quantifiable measures for their goals, strategies, and activities could provide a way for ODE to reduce the number of narrative questions they require. Requiring these quantified measures alongside LPGTs could serve as a jumping off point for their regular discussions with district administrators, and ODE could set internal expectations for what staff should discuss and document during these meetings. Doing so while ODE is still rolling out accountability processes for integrated programs will allow ODE to collect baseline data on grantee goals.

ODE can do more to foster statewide discussion of what works

ODE has helped disseminate some important practices:

- Some districts conduct empathy interviews, where school officials talk with students about what they need.
- Oregon's Quality Education Commission prepares a biennial "Quality Education Model" report on staffing and funding required to meet Oregon's education goals, which includes high-level discussion of best practices.
- ODE's Every Day Matters program, which focuses on attendance, details steps districts can take.
- Individual state programs to increase the success of specific focal student groups, such as African-American students and Latino students, also detail both high-level and specific strategies.

Information from district progress on LPGTs and additional goals can provide additional concrete, ground-level examples. To start, ODE could look at data from its own LPGT implementation process, which includes improvement rates for the Top 10% of districts to help districts set targets. At this point, ODE does not clearly describe which districts are included within Top 10% metrics or what practices they used to drive above-average performance. More information on the results of planned district activities can add to this detail.

ODE needs to better report results and challenges to policymakers and the public

ODE's efforts for HSS and other integrated grants focus largely on results in individual districts. The agency has not yet developed a plan to report summaries of progress and results once LPGT outcomes are clear. ODE needs a plan for systematic evaluation that quantifies outcomes, explains how strategies are expected to improve outcomes, and verifies whether those improvements have occurred. This plan should identify data sources so the agency can ensure the right data are available and collected.

As we noted in our 2022 systemic risk report, meaningful reporting is crucial for the Student Success Act to be effective. The act's requirements for student growth targets and evaluation by ODE could generate meaningful public reporting, but it is not clear yet how ODE will report these results and evaluations.

Our overall concern is that ODE's reporting to policy makers and the public on district results under HSS and the Student Success Act will be limited to high-level LPGT results, self-reported district results on some progress markers, and excerpts from selective narrative reports by districts on successful strategies and challenges.

With effective planning, ODE can provide reports to the Legislature that highlight student outcomes, effective practices, and identify challenges districts face — such as teacher shortages in key areas — that may need legislative action. With nearly 200 districts in Oregon and multiple goals for each, this will not be a simple task. ODE rightly notes improvement on outcome metrics like graduation rates may take time to materialize — the agency does not expect to have outcome trends it can act on until 2026 — and may focus mainly on the more nebulous district progress markers to start.

This limited focus, particularly given the years that have passed since the HSS program and the Student Investment Account began, is likely to be more accepted by state leaders and the public if the agency can detail how it plans to identify and report on successful practices and effective spending. A plan for effective reporting to the Legislature and the public could also give policymakers more confidence when considering increases in state funding for K-12 schools.

Recommendations

To strengthen its ability to promote improvements in student success through HSS, ODE should:

1. Update ODE processes for HSS grantees to enable ODE to collect baseline data, efficiently connect strategies to results, identify effective investments in student success, and identify barriers that policy makers can address. ODE should:

    a. As part of the biennial planning process, work with grantees to identify measurable indicators relevant to the strategies they choose to invest in, including CTE participation and accelerated learning rates where applicable. Grantees should briefly explain, and ODE should document, the effect strategies are expected to have on LPGTs, Local Optional Metrics, or other measurable indicators, to better understand whether expectations are appropriate.

    b. Collect and review outcome data on the measurable indicators selected during the biennial planning process, in addition to any LPGTs and Local Optional Metrics.

    c. As part of biennial plan approval, ensure that grantees consider past performance and address strategies that aren't working.

    d. Ensure ODE collects information during quarterly and annual reporting to understand whether a strategy is effective for multiple grantees and what common challenges grantees face in adopting their strategies.

    e. Consider adopting these processes for grantees who participate in other programs integrated with HSS.

2. Develop a plan for how ODE will use any information requested from grantees so grantees are only asked to provide information ODE will use.

3. To ensure eligibility requirements meet statutory intent, develop a process to evaluate whether systems implemented in high schools to meet eligibility requirements improve students' progress toward graduation beginning with grade 9, increase the graduation rates of high schools, and improve high school graduates' readiness for college or career.

4. Develop a plan to document and share strategies statewide that have been effective at helping grantees meet their targets or overcome challenges, including the roles played by ODE staff, Education Service District liaisons, and any other external partners.

5. No later than the 2026 legislative session, report to the Legislature on how ODE plans to identify, disseminate, and report on successful practices, effective spending, and statewide challenges facing grantees.

To reduce administrative demands on districts and enable ODE staff to focus more on student success, ODE should work with the State Board of Education and Legislature to further:

6. Integrate related grants.

7. Standardize reporting systems.

8. Make compliance requirements more efficient.

Objective, Scope, and Methodology

OBJECTIVES

1. To what extent have HSS funds resulted in expanded CTE offerings, increased college-level opportunities, and added additional dropout prevention supports for Oregon students?

- How have program participants spent their funds?
- Have HSS investments expanded CTE programs?
- Have HSS investments expanded dropout prevention strategies?
- Have HSS investments expanded college readiness programs?

2. Have HSS funds had a positive impact on graduation rates and students' college and career readiness?

- To what extent have HSS funds improved key outcome measures?
- To what extent have program participants closed access gaps (i.e. the ability to participate) for focal student groups?
- To what extent have program participants closed outcome gaps (i.e. whether students benefit from the interventions) for focal student groups?

SCOPE

This audit examined HSS spending for the first six years of the program and the impact of the HSS funds on program participants and student success. It also examined ODE's monitoring of the HSS program, its efforts to integrate programs, including the HSS program, and its efforts to help districts set and report LPGTs. While the audit did include review of monitoring under the new integration, it did so only as it relates to the HSS program.

METHODOLOGY

To meet our objectives, we performed the following procedures:

- Documented requirements for the program under Oregon statute and administrative rule;
- Reviewed best practices for increasing or expanding CTE, increasing access to college-level opportunities, dropout prevention, and reduction of chronic absenteeism;
- Reviewed best practices for grant distribution and accountability, performance monitoring, provision of technical assistance, and sharing best practices;
- Reviewed HSS documentation submitted to ODE by program participants, including grant agreements and amendments;
- Conducted interviews with agency staff and external stakeholders;
- Reviewed previous HSS program analyses by ODE and external parties;
- Reviewed ODE's monitoring and support for program participants;
- Evaluated grantee-reported spending and staffing data from 2017-18 through 2022-23, the first six years of the HSS program;
- Analyzed datasets related to success in high school from ODE, Education Northwest, and national sources to evaluate Oregon high school results on key outcome metrics since the program took effect;

- Selected 20 districts for in-depth spending and performance review, visited six of them, and corresponded with the remaining 14 districts. Site visits included program tours and Interviews with school and district staff, teachers, and students;
- Analyzed the potential impact of district-level HSS spending on district level metrics;
- Calculated correlations of changes in district level outcomes since 2016-17 against 17 variables: district child poverty levels, the size of the district's 2022-23 graduation cohort, and 15 measures of district-level HSS spending; and
- Reviewed the application, budgeting, and reporting process for integrated grants and all district LPGT submissions for the 2023-25 grant cycle, including related notes by ODE review teams.

Our analysis of outcome metrics relied in part on confidential student outcome information by district or school that is suppressed in public records to avoid inadvertently identifying results for individual students. This information was not included in the report.

Our judgmental selection of 20 districts to review in depth focused on districts of various sizes, urban and rural districts, representation from multiple regions within the state, poverty levels, results on outcome measures, and size of student groups by race and ethnicity. The 20 districts reported spending $253 million in HSS funds from 2017-18 to 2022-23, a third of the $760 million in total spending reported for the six years.

DATA RELIABILITY REVIEW

Our assessment of the reliability of data used in this audit focused on grantee-reported spending and staffing data and on high school performance outcome metrics reported by ODE and Education Northwest. The Education Northwest reporting drew on data from ODE, the Higher Education Coordinating Commission, and the National Student Clearinghouse.

We evaluated data reliability by reviewing reliability assessments conducted by this office in previous audits of ODE and the Higher Education Coordinating Commission, requesting and reviewing up-to-date information about data and systems, corresponding with ODE and Education Northwest officials about the data, reviewing HSS program spending data in detail for 20 school districts, and examining district responses and supporting documents for a limited subset of reported spending transactions in these districts.

For outcome metrics, we determined trends reported for economically disadvantaged students were not reliable because federal rules intended to expand eligibility for free-and-reduced price lunches — the basis for defining students in the economically disadvantaged category — have begun allowing all students at certain schools to qualify without income verification, reducing year-to-year comparability. We also determined key outcomes and counts, including dropout rates, ninth grade on-track rates, graduation rates, regular attender rates, and the number of CTE programs, were less reliable during the pandemic, also reducing comparability. Finally, we determined outcome trends for small districts can be less reliable because small fluctuations — such as having slightly more graduates than in years past — can substantially affect outcome results.

For HSS spending and staffing reported by grantees, we determined grantee-reported staffing numbers appeared to be imprecise, reliable for our purposes only in the statewide aggregate. We also concluded

statewide HSS spending data is likely more reliable than individual grantee spending data. As a result, the spending data included in this report is only at the statewide level.

After accounting for these issues, we determined the reported spending and staffing data and performance outcome data from ODE, the Higher Education Coordinating Commission, and Education Northwest were sufficiently reliable for the purposes of this report.

INTERNAL CONTROL REVIEW

We identified deficiencies in the following internal controls significant to our audit objectives.[15]

- Control activities
  - ODE co-development, approval, and monitoring of LPGTs and Local Optional Metrics
- Information and communication
  - Sharing of best practices
  - Collecting high quality, accurate data
  - Public reporting

Deficiencies with these internal controls were documented in the results section of this report.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We sincerely appreciate the courtesies and cooperation extended by officials and employees of ODE and school districts during the course of this audit.

Audit team

Andrew Love, CFE, Audit Manager
Krystine McCants, MEcon, CIA, Principal Auditor
Scott Learn, M.S.J., Principal Auditor
Denise Brock, M.Ed Staff Auditor
Matt Kaufman, Ph.D., CPA, CISA, Staff Auditor
Dorian Pacheco, MPA, Staff Auditor

ABOUT THE SECRETARY OF STATE AUDITS DIVISION

The Oregon Constitution provides that the Secretary of State shall be, by virtue of the office, Auditor of Public Accounts. The Audits Division performs this duty. The division reports to the Secretary of State and is independent of other agencies within the Executive, Legislative, and Judicial branches of Oregon government. The division has constitutional authority to audit all state officers, agencies, boards and commissions as well as administer municipal audit law.

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[15] Auditors relied on standards for internal controls from the U.S. Government Accountability Office, report GAO-14-704G.

December 6, 2024

Kip Memmott, Director

Secretary of State, Audits Division

255 Capitol St. NE, Suite 180

Salem, OR 97310

Dear Mr. Memmott,

This letter provides a written response to the Audits Division's final draft audit report titled, "High School Success Grants Have Expanded Important Programs, but ODE can do More to Identify and Share Effective Strategies."

Thank you for highlighting the work underway at the Oregon Department of Education (ODE) through the High School Success initiative. The recommendations offered will support our continuous improvement efforts both through High School Success as well as our efforts across the agency to increase collaboration, reduce duplication of effort, and streamline efforts to support students on their path to graduation and beyond.

Thank you to the Audits Division staff for the engagement, conversations, and intentional recommendations to support and strengthen our work.

Below is our detailed response to each recommendation in the audit.

RECOMMENDATION 1

Update ODE processes for HSS grantees to enable ODE to collect baseline data, efficiently connect strategies to results, identify effective investments in student success, and identify barriers that policy makers can address. ODE should:

A.   As part of the biennial planning process, work with grantees to identify measurable indicators relevant to the strategies they choose to invest in, including CTE participation and accelerated learning rates where applicable. Grantees should briefly explain, and ODE should document, the effect strategies are expected to have on LPGTs, Local Optional Metrics, or other measurable indicators, to better understand whether expectations are appropriate.

B.   Collect and review outcome data on the measurable indicators selected during the biennial planning process, in addition to any LPGTs and Local Optional Metrics.

C.   As part of biennial plan approval, ensure that grantees consider past performance and address strategies that aren't working.

D.   Ensure ODE collects information during quarterly and annual reporting to understand whether a strategy is effective for multiple grantees and what common challenges grantees face in adopting their strategies.

E.   Consider adopting these processes for grantees who participate in other programs integrated with HSS.

Agree or Disagree with Recommendation	Target date to complete implementation activities	Name and phone number of specific point of contact for implementation
Agree	June 2027	Maggie Mashia 503-559-0736

Narrative for Recommendation 1

ODE supports this recommendation. It has overlap with several of the other recommendations around dissemination of good strategies to help grantees meet their student's educational goals; those components are within the scope that can be addressed over the next few years.

To be in good partnership with grantees, and not substantially increase administrative burden for the 2025-27 biennium's application cycle, ODE will thoughtfully consider how to meet the intent of this recommendation while staying within the purview of the HSS legislation.

ODE will further review existing legislation; hold listening sessions with grantees on how to approach this recommendation while making it a fruitful exercise for grantees; and consider the technical, legislative, and State Board steps needed. ODE does not expect to make any changes to the format or measurability of the grantee outcomes prior to the 2027-29 biennium.

Additionally, it is important to note that a few items included in this recommendation are already in place or are planned to be in place within the next few years, including: (c) the consideration of past performance and

strategies that aren't working; and (d) reviewing grantee reporting for strategies that are effective across multiple grantees.

RECOMMENDATION 2		
Develop a plan for how ODE will use any information requested from grantees so grantees are only asked to provide information ODE will use.		
Agree or Disagree with Recommendation	**Target date to complete implementation activities**	**Name and phone number of specific point of contact for implementation**
Agree	June 2027	Maggie Mashia 503-559-0736

Narrative for Recommendation 2

All of the information currently requested as part of the application submission are based on requirements rooted in statute. All programs under the Integrated Application, including HSS, use this information to learn what a grantee is hearing from their community and discovery through the needs assessment process. The information in the application also provides insight into the outcomes and strategies established, as well as challenges grantees are facing. We have adjusted what information we collect during quarterly and annual reporting to reduce administrative burden for grantees, and ensure information is used for further improvement.

Furthermore, ODE continues to explore opportunities to develop systems to effectively review and analyze information gathered in order to identify instances of duplication and establish more effective information sharing across the agency.

RECOMMENDATION 3		
To ensure eligibility requirements meet statutory intent, develop a process to evaluate whether systems implemented in high schools to meet eligibility requirements improve students' progress toward graduation beginning with grade 9, increase the graduation rates of high schools, and improve high school graduates' readiness for college or career.		
Agree or Disagree with Recommendation	**Target date to complete implementation activities**	**Name and phone number of specific point of contact for implementation**
Agree	June 2027	Maggie Mashia 503-559-0736

Narrative for Recommendation 3

ODE staff will engage in a process to assess system implementation as it relates to HSS eligibility starting in September 2025 and continuing through December 2026. During that time frame grantees will have opportunities to meet with ODE staff to demonstrate that required systems, as described in the HSS Eligibility Rubric, are fully in place to support every high school student. Any HSS grantee still not meeting eligibility will be put on a Corrective Action Plan for the 27-28 school year where a portion of their HSS funds will be directed by ODE to target the area(s) of eligibility that still remain unfulfilled.

As we move through the eligibility review process ODE will analyze available student outcome data related to graduation rates, 9th Grade On-track, and other measures connected to college and career readiness to assess the effectiveness of systems implementation as measured by the eligibility reviews.

RECOMMENDATION 4

Develop a plan to document and share strategies statewide that have been effective at helping grantees meet their targets or overcome challenges, including the roles played by ODE staff, Education Service District liaisons, and any other external partners.

Agree or Disagree with Recommendation	Target date to complete implementation activities	Name and phone number of specific point of contact for implementation
Agree	June 2026	Maggie Mashia 503-559-0736

Narrative for Recommendation 4

ODE staff have already begun examining student outcome data to identify grantees with high achievement levels across all students *and* focal student categories. From there, staff further analyze to identify those grantees who have seen significant and / or consistent growth year over year. The next step is to identify the strategies, or individual activities, grantees identified as part of their Integrated Application & Budget.

To build on this work, ODE will continue to analyze and reach out to grantees to learn additional contextual information and how grantees overcame the challenges or barriers they experienced. As we gather this information, we will establish a system by which we publish our findings and share annually, at a minimum, in order to provide an additional resource for planning and implementation.

RECOMMENDATION 5

No later than the 2026 legislative session, report to the Legislature on how ODE plans to identify, disseminate, and report on successful practices, effective spending, and statewide challenges facing grantees.

Agree or Disagree with Recommendation	Target date to complete implementation activities	Name and phone number of specific point of contact for implementation
Agree	December 2025	Maggie Mashia 503-559-0736

Narrative for Recommendation 5

ODE will submit a report to the Legislature on our plan to further identify, disseminate, and report on successful practices, effective spending, and statewide challenges facing grantees as described in Recommendation 4.

RECOMMENDATION 6		
Work with the State Board of Education and Legislature to further integrate related grants.		
Agree or Disagree with Recommendation	**Target date to complete implementation activities**	**Name and phone number of specific point of contact for implementation**
Agree	June 2027	Tim Boyd (503) 580-5105

Narrative for Recommendation 6

This is ongoing work for ODE, with a commitment to make strides toward further integration throughout the 2025-27 biennium.

RECOMMENDATION 7		
Work with the State Board of Education and Legislature to further standardize reporting systems.		
Agree or Disagree with Recommendation	**Target date to complete implementation activities**	**Name and phone number of specific point of contact for implementation**

Agree	June 2027	Tim Boyd (503) 580-5105

Narrative for Recommendation 7

This is ongoing work for ODE, with a commitment to make strides toward further standardization of reporting systems and requirements throughout the 2025-27 biennium.

RECOMMENDATION 8		
Work with the State Board of Education and Legislature to further make compliance requirements more efficient.		
Agree or Disagree with Recommendation	**Target date to complete implementation activities**	**Name and phone number of specific point of contact for implementation**
Agree	June 2027	Tim Boyd (503) 580-5105

Narrative for Recommendation 8

This is ongoing work for ODE, with a commitment to make strides toward ensuring compliance requirements are efficient, including the reduction of requirements where applicable, throughout the 2025-27 biennium.

Please contact Cassie Medina at 503-510-2968 with any questions.

Sincerely,

Dr. Charlene Williams
Deputy Superintendent of Public Instruction
Director of the Oregon Department of Education

cc: