

# The Student Investment Account

2022 Legislative Report

January 2022



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## EXECUTIVE SUMMARY

### The Student Investment Account

The Student Investment Account (SIA) was established with the passage of the Student Success Act (SSA) [ORS 327.175](#) in May 2019. The SIA provides all Oregon school districts and eligible charter schools with access to non-competitive grant funds from the SIA when they have complied with application requirements set forth by the legislature and administered by ODE. The SIA receives *at least* 50% of the funds collected and deposited in the Fund for Student Success.

SIA grants are established for two purposes: (1) meeting students' mental or behavioral health needs and (2) improving academic outcomes and reducing academic disparities for students of color, students with disabilities, emerging bilingual students, and students navigating poverty, homelessness, and foster care and any other student groups that have historically experienced academic disparity as determined by the State Board of Education by rule. The student groups set out in the SIA are referred to in ODE communications and guidance as "focal student groups" which will be used throughout this update.

SIA grants allow districts and eligible charter schools wide latitude in determining through required engagement processes how best to use the allocated funds to improve outcomes for students as long as the use falls within one of the described allowable use categories. Those categories are<sup>1</sup>:

1. **Increased Instructional Time** - Applicants may increase hours or days of instruction time or add summer programs and/or before and after school programs.
2. **Improving Student Health and Safety** - Applicants may focus investments on social-emotional learning and development, student mental and behavioral health, improvements to teaching and learning practices or organizational structures that lead to better interpersonal relationships at school, student health and wellness, trauma-informed practices, school health professionals, or facility improvements that improve student health or safety.
3. **Reducing Class Size** - Applicants may increase the use of instructional assistants, educators, and counselors, using evidence-based criteria to ensure appropriate student-teacher ratios or staff caseloads.
4. **Well Rounded Education** - Applicants may include developmentally appropriate and culturally responsive programs for literacy in pre-k through third grade, culturally responsive practices and programs in grades six through eight that includes counseling and student support connected to colleges and careers, broadened curricular options at all grade levels (including access to art, music, PE, science, etc...), and access to educators with a library media endorsement.
5. **Ongoing Community Engagement** - Applicants may use a portion of funds to improve ongoing community engagement practices.
6. **Administrative Costs** - Applicants may utilize up to five percent or \$500,000 of the total amount spent, whichever is lower, each year for administrative costs.

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<sup>1</sup> It is worth noting that within each category the statute ends with the clause "which may include," which creates both flexibility and challenges in determining allowable use in administration.

In the 2021 Legislative session, the passage of [HB 2060](#) created three technical changes, including:

1. Changing the definition of “economically disadvantaged students,” one of the focal students groups named in the SIA, from being determined by eligibility for free and reduced price lunch to a definition set by rules adopted by the State Board of Education. *There is a work group that is currently engaging with partners to receive feedback in advance of rules going before the State Board of Education.*<sup>2</sup>
2. Establishing that grantees have the option to develop local metrics as well as targets related to student mental and behavioral health needs, as established in rule by the State Board of Education. *There is a work group starting in February 2022 to engage with mental and behavioral health professions to receive feedback in advance of rules going before the State Board of Education.*
3. Youth Corrections Education Programs (YCEP) and Juvenile Detention Education Programs (JDEP) are now eligible to apply for and receive SIA funds. *The SIA team has been working closely with leaders of YCEPs and JDEPs to determine a process for programs to access funding. YCEP and JDEP programs will need to apply during the window of April 1 - May 31, 2022 in order to receive access to SIA funds in the second year of the 2021-23 biennium.*

In this first required annual report, updates on the following aspects of the SIA will be covered:

1. **Operationalizing the SIA:** In this section, ODE provides an update on the specific impacts of COVID-19 on the first year of implementing the SIA. Additionally, ODE offers information on operational pieces, including staffing and development of Oregon Administrative Rules, needed to launch the SIA work.
2. **SIA Implementation Progress:** ODE begins by sharing high-level insights into early implementation of the SIA based on feedback from partners, Education Service District (ESD) Liaisons, and ODE staff. Information about SIA application submission, review, and SIA plan updates is offered.
3. **Analysis of Implementation:** ODE provides an analysis on community engagement and equity as well as an update on SIA expenditures for the 2020-21 school year based on annual reports submitted by SIA grantees, which includes information on how grantees spent funds in all of the allowable use areas. In this section the monitoring and evaluation framework for the SIA is detailed, with information provided about the three components - Longitudinal Performance Growth Targets (LPGTs), progress markers, and local optional metrics - as well as the reporting requirements for the SIA.
4. **Resources, Support, & Coaching:** This section details the relationship of the Education Service District Technical Assistance funds to the SIA work, naming specific impacts the ESD Liaisons have had to date to support districts in their regions. ODE also offers additional information about the technical assistance, Intervention & Strengthening coaching program, and Intensive Coaching Program.
5. **What’s Ahead:** Finally, ODE provides a preview into two bodies of work on the immediate horizon, including integrating six programs (inclusive of SIA) as well as deepening the collaboration and strength of ESD partnerships to support the integration of programs.

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<sup>2</sup> Legislative record offers documentation on why this change was made. The brief rationale is that the efforts to expand access to food has a counter effect in getting a more accurate sense of poverty and impacts on students, thus the workgroup to determine what might be a better way to define.

## OPERATIONALIZING THE SIA

### Impacts of COVID-19

**Reduction in Funding:** A total of \$472,740,000 was initially projected for the SIA grants in the second year of the 2019-21 biennium. In August 2020, the amount distributed in the second year of the biennium was reduced, through legislative action in a special session, to a total of \$150 million given the economic impact of COVID-19 on the Corporate Activity Tax.

**Release of Longitudinal Performance Growth Targets (LPGTs):** In the August 2020 special session, the Legislature created increased flexibility for the administration of the SIA in [Section 70 of HB 4304](#), which released all SIA applicants from needing to develop or track LPGTs for one year only due to limitations on data collections as a result of COVID-19. The bill named that ODE could develop other applicable performance growth targets and indicators of performance.

**Amended Grant Application and Agreement Process:** The Legislature provided ODE with the flexibility to determine the process for plan and grant agreement amendments. The State Board of Education adopted 2020-21 SIA Amended Grant Application and Grant Agreement temporary rules (581-014-0006) on 10/01/2020. These temporary rules were in effect through 03/28/2021.

**Prioritization of Mental and Behavioral Health:** Additionally, the Legislature encouraged the prioritization of SIA funds to be used to address student mental and behavioral health needs without a formal requirement. Therefore, allowable use areas were not formally narrowed by ODE. Applicants needing ideas or support were encouraged to utilize the [Centering Mental and Behavioral Health resource](#) released in conjunction with the Oregon Health Authority in January 2020.

### ODE Staff Hired

29 new positions were originally budgeted for ODE to implement the Student Investment Account with staff additions planned to come at different intervals based on flows of new resources anticipated from the Corporate Activity Tax (CAT). During the August 2020 special session, the number of SIA positions was both temporarily reduced to 21 new positions and several positions were frozen (recruiting and hiring paused). This caused a significant administrative pause on the hiring of SIA staff. During the past Legislative session, the number of positions was reinstated to 29. As of January 26, 2022, 19 positions have been hired. Staffing has also been impacted to some degree by limited candidate pools with at least six failed recruitments. Current hiring projections would have all initially designed SIA positions filled by June 30, 2022.

Ten positions are actively being recruited:

Role	Quantity
Research Analyst	2
Education Specialist	1
Administrative Specialist	2
Training and Development	1

Role	Quantity
Program Analyst	2
Governmental Auditors	2

### Development of OARs

At present, the State Board of Education has adopted the following permanent rules for the Student Investment Account:

- [Definitions for Student Investment Account](#) (581-014-0001) adopted 03/20/20
- [Fund Administration for Student Investment Account](#) (581-014-0004) adopted 03/20/20
- [Charter School Eligibility for Student Investment Account](#) (581-014-0007) adopted 03/20/20
- [Definitions for Student Investment Account: Third Grade Reading Proficiency](#) (581-014-9999) adopted 12/16/19
- [Reduction of Distribution Appeal Process](#) (581-014-0010) adopted 6/22/21
- [Performance Review Standards](#) (581-014-0013) adopted 6/22/21
- [Just Cause and Random Audit Process](#) (581-014-0016) adopted 6/22/21

At present, the State Board of Education has adopted the following permanent rules for the Intensive Coaching Program, within the SIA:

- [Intensive Program & Student Success Teams: Definitions](#) (581-017-0729) adopted 1/28/21
- [Intensive Program & Student Success Teams: Purpose](#) (581-017-0732) adopted 1/28/21
- [Intensive Program & Student Success Teams: Eligibility](#) (581-017-0735) adopted 1/28/21
- [Intensive Program & Student Success Teams: Criteria, Agreement, and Establishing Improvement](#) (581-017-0738) adopted 1/28/21
- [Intensive Program & Student Success Teams: Funding](#) (581-017-0741) adopted 1/28/21
- [Intensive Program & Student Success Teams: Reporting](#) (581-017-0744) adopted 1/28/21

In addition to the existing permanent rules for the Intensive Coaching Program, we are currently working to make a temporary rule– OAR 581-017-0741 (4)– permanent. In implementing this program, ODE identified a need for districts to access a limited amount of initial funding at the onset of the program before the stewarding body could issue formal recommendations.

Additionally, through working with grant recipients and our ESD Liaisons over the last two years of implementation, ODE has determined there to be three structural components of the SIA that should be addressed in rule and supported by additional definitions within the rules. The SIA Definition rules previously established speak to just one of those structural areas of the SIA, which is eligibility and fund administration. Through the new proposed rule set, ODE is establishing rules in line with the spirit and intent of the SIA, to engage with focal groups that are not currently captured within data collected by the department. In order to both ensure these voices are a part of the broader engagement for the SIA and to maintain the ability of districts to complete Longitudinal Performance Growth Targets, ODE has further defined a difference in those groups identified for the purpose of engagement and those groups

that will be included within LPGTs. In addition, these proposed rules will clearly outline the following structural components of the SIA and provide the necessary definitions. The three structural areas of the SIA that the new rules will speak to and support with definitions are:

- **Eligibility and Fund Administration:** The previously adopted rules address the eligibility of charter schools to apply independently of a district as well as fund administration.
- **Community Engagement:** The statute outlined focal groups, while also giving the State Board of Education the authority to name other focal groups as adopted in rule. ODE is proposing updated rules for new definitions for all focal groups including naming new focal groups aligned with ESSER III and the student success plans, funded through the Statewide Education Initiative Account, that have been developed. This rule would set a baseline for who must be engaged, but give districts and eligible charter schools permission to identify additional focal groups within their communities that may not otherwise be named by rule. The proposed rules outline requirements for a district that wishes to identify additional focal groups such as students who have faced academic disparities or who are historically/currently underserved based on immutable characteristics, cultural affiliations, mental or behavioral health barriers, or differing abilities.
- **Longitudinal Performance Growth Targets:** Within the proposed rule, only those focal groups with data that are available may be used for LPGTs. The rules would allow that as additional data becomes available to identify other focal groups in data then those groups may also be required to be included in LPGTs. Grant recipients also have the option of using additional data in the formulation of local optional metrics in addition to the LPGTs.

Before rules are heard before the State Board, they are brought before the Rules Advisory Committee. The purpose of this committee is to seek public input on the development of proposed administrative rules. These draft rules have been presented before the Rules Advisory Committee as both a concept in December 2021 and for a first read in January 2022. They will be considered again at the February 2022 Rules Advisory Committee meeting and on track for adoption by the State Board in April 2022.

## SIA IMPLEMENTATION PROGRESS

### Insights into Early Implementation

ODE staff leading the work to implement the SIA through the constant change points of COVID-19 have gathered partners, ESD Liaisons, and at ODE to reflect on initial lessons or things to consider moving forward. These are presented to support understanding of implementation dynamics and are not intended to be conclusive:

- 1. The promise of the law remains** - There is a widespread sense that the two years of listening done by the Joint Committee for Student Success was important and led to legislation that holds real promise of educational change in Oregon. The law embeds key principles of authentic community engagement, attention to focal students along with families and staff, and it puts the application of an equity lens in relationship to strategic planning focused on student well-being and solving long-standing academic disparities.
- 2. Accountability in relationships and follow-through** - The law changes what districts and schools can and should focus on and creates new ways to relate to community, ESDs, and ODE. There are positive early signs of these changes coming to life.
- 3. Trust must continue to be earned. The promise of the law also offers the potential for broken promises** - As a potent example, a school district operating in good faith engages hundreds of students, families, and staff in new ways but hasn't fully digested its changed financial situation. Add to this situation a reduction of SIA funding and the complexity of COVID-19 response, and the result is community members experiencing confusion and frustration as the school district directs SIA funding in alternate ways, which are all allowable by category and within the scope of the plan, but may not fully align with priorities just named and set for the district during the community engagement process.
- 4. Goals of increased "knowledge mobilization" and "networked learning" are important and are mostly in front of us with some early signs of positive capacity building through ESDs.** Written about in the prior legislative update and in the December 2019 SIA guidance, one of the hallmarks of [generative educational systems change](#) is increasing the culture and rate of professional sharing and learning so that key innovations in one context are digested (not simplistically replicated) in another. The majority of the technical assistance and field-building work designed into the SIA is underway, with contracts executed with two organizations developing a series of modules that will be accessible to all educators across Oregon and another Request for Proposals set to launch in spring 2022.
- 5. Consolidation and coherence across state and federal funding streams and programs is essential to support quality implementation.** In the same way the Joint Committee on Student Success toured Oregon, it may be a good time for an implementation tour to get into the details that come from understanding the barriers and challenges presented by there being more than

88 distinct state programs in addition to federal programs in addition to COVID-19 impacts and priorities. One of the best ways to build support and deepen implementation is to take fragmentation and the administrative burden districts experience out of the equation. ODE staff have done work to map these challenges and begin to make changes in internal operations and integrated guidance. There is significant room for improvement without additional legislation. That said, before any new programs are designed, it would be ideal to consider what else can be done in statute to support this goal while keeping districts focused on the important work enshrined in the SIA and other Student Success Act programs and priorities.

### **SIA Grant Application Overview: Review & Grant Agreement Processes**

To receive funding, applicants needed to comply with application requirements set forth in the [Student Success Act](#) and informed by the [Guidance for Eligible Applicants](#) provided by ODE in December 2019, which included focused community and student engagement, use of an equity lens, alignment to the Continuous Improvement Plan (CIP), consideration of relevant data, and consideration of the best practice recommendations of the state's [Quality Education Model Report](#). ODE received a total of 208 applications from districts and eligible independent charter schools out of a total possible 210. Within the initial applications, ODE received one consortium application that encompasses seven small school districts within one region and 74 charters applied with sponsoring districts. Two districts opted not to apply for SIA funding in the first year but planned to apply in the next application cycle. One district that initially applied for SIA funding ultimately decided to decline funding due to needing to focus on other priorities. This reduced the total applications to 207 for the 2020-21 school year, which encompassed 191 districts, (inclusive of 74 sponsored charter schools applying with districts), 11 eligible independent charter schools, and 3 state-sponsored charters.

The review process involved 48 staff members from across ODE who, after receiving training, worked in pairs to review each application. In addition to the reviewers, each application was assigned an ODE designated application manager to steward the application through both the review process and grant agreement process. The review process was originally to include panel presentations by the reviewers to Quality Assurance and Learning Panels (QALP). QALP were designed to be composed of community members, students, families, advocates, ESD staff, retired and current educators, and business leaders and were described in the [December 2019 SIA Guidance](#). However, due to COVID-19 these panels were not implemented. ODE reviewers still completed the presentation template to outline the application as well as their joint assessment.

Applications were deemed to fall into one of four categories:

1. **Meet Requirements** – The application was determined to meet all requirements and was ready to move forward to the grant agreement process.
2. **Meet Requirements with Small Changes** – The application mostly met requirements, but needed additional information or materials to fully meet requirements. Examples of small changes included re-submitting the budget using the required budget template or minimal addition of narrative to support the application. Once the additional information was

submitted, reviewed, and approved, the applicant then moved into the grant agreement process.

3. **Needs Additional Review** - The application was recommended to be sent to the Additional Review Team for another review. The Additional Review Team would review the application as well as the ODE reviewers' joint assessment before making a final assessment - meets requirements, meets requirements with small changes, or does not meet requirements and needs major changes. Next steps and follow-up was dependent on the final assessment.

4. **Does Not Meet Requirements, Needs Major Changes** – The application did not meet the requirements and required substantial changes to be made prior to moving forward in the process. Applicants falling into this category were invited to have a call with ODE to discuss the changes and additional information that would need to be submitted in order to meet application requirements. Examples of major changes included submitting missing documents such as community engagement artifacts or substantial additions to narrative portions of the application. Once the additional information was submitted and approved, the applicant then moved into the grant agreement process.

By the end of the 2019-21 biennium, 206 of the 207 original applications have been reviewed and a joint assessment completed by ODE. Of those, the 206 applicants received grant agreements and access to SIA funds. The remaining applicant was unable to meet application requirements by the end of the biennium and lost access to the funding.

### **Submission and Review of Plan Updates for the 2021-23 Biennium**

In December 2020, ODE released the [Supporting Quality Implementation](#) guidance, which provided additional guidance to districts and eligible charter schools to support and sustain high-quality implementation of the SIA funds they will steward through June 2023.

After reviewing the legislative intent of the SIA and administrative accommodations possible, ODE determined SIA grantees would move through a plan update process for the 2021-23 biennium. Specifically, SIA grant recipients were required to submit a SIA Plan Update, detailing whether they would make an adjustment (minor changes) or amendment (major changes) to their initial three-year plan submitted in the original application. This was a pivot from the original guidance that named districts and schools would complete a full application cycle in spring of 2021.

The SIA Plan Update submission process allowed previous grant recipients to provide ODE with a streamlined set of essential information including the new budget for the 2021-23 biennium, narrative information on the use of an equity lens, and information on continued community engagement processes to inform changes to the plan. Grant recipients submitted SIA Plan Updates during the window of May 1 - June 30, 2021. A preview of the SIA plan adjustment/amendment submission requirements was included within the [supplemental guidance](#). Districts and newly eligible independent charter schools were also able to apply in this window and were required to submit a full application

meeting all of the requirements outlined in the [original SIA guidance](#) and were reviewed in the same manner as all original applications.

For the second year of SIA implementation, 203 SIA Plan Updates were received from previous grantees. One previous SIA grantee opted not to submit a SIA Plan Update given capacity to implement and monitor the work. The two districts that did not apply previously opted to apply for funding due in large part to the overlapping requirements between SIA and ESSER III district plans. Two newly eligible independent charter schools also applied for SIA funds; previously both had received SIA funding by applying with their sponsoring district.

The review process of SIA Plan Updates was completed by 8 staff members within the Office of Education Innovation and Improvement. SIA Plan Updates were deemed to fall into one of three categories:

1. **Meet Requirements** - The SIA Plan Update was determined to meet all requirements and was ready to move forward to the grant amendment process.
2. **Generally Meets Requirements** -The SIA Plan Update generally met requirements, but needed additional information or materials to fully meet requirements. Examples of small changes included re-submitting the budget using the required budget template or minimal addition of narrative to support the application. Once the additional information was submitted, reviewed, and approved, the district or school then moved into the grant amendment process.
4. **Does Not Meet Requirements** - The SIA Plan Update did not meet the requirements and required substantial changes to be made prior to moving forward in the process. Districts and schools falling into this category were invited to have a call with ODE to discuss the changes and additional information that would need to be submitted in order to meet requirements. Examples of major changes included submitting missing documents such as community engagement artifacts or substantial additions to narrative portions of the application. Once the additional information was submitted and approved, the district or school then moved into the grant amendment process.

By January 26, 2022, 197 of the SIA Plan Updates had been reviewed and met requirements and 4 of the 4 new applications submitted had met requirements.

## ANALYSIS OF IMPLEMENTATION

### **Community Engagement and Equity at Center of SIA**

At the heart of the SIA is a commitment to equity and community engagement. Applicants were required as part of the application process to utilize an equity lens to guide both their community engagement as well as their planning and decision-making. Overall, over 40% of applicants used the [Oregon Equity Lens](#) adopted by ODE. Other districts used a variety of Equity Lens tools such as Education Service District (ESD) developed tools or lenses developed independently. Applicants were required to name how they specifically used the equity lens or tool to support their plan development after receiving input from community engagement, completing a needs assessment, and reviewing recommendations from the [Quality Education Model Report](#). In the initial review of SIA applications, ODE noted that the most common uses of an equity lens were during community engagement sessions and discussions of the SIA plan as it was being developed and reviewed.

Applicants were also required to engage in authentic and meaningful community engagement with focal student groups and their families as well as the larger community as part of creating their SIA Plan. From reviewing SIA applications, ODE has seen evidence of a wide range of engagement strategies and activities completed to gather input to inform the development of the three-year SIA plan.

*Districts approached community engagement in a variety of ways.* Districts involved community, faith, and business leaders as well as advocates from community-based organizations and advocacy groups. Districts also engaged with Oregon's Tribal communities that involved the sovereign tribal nations, leaders, and members. For some districts this was very intentional engagement through meetings with the tribal government and education departments as well as specific engagement with tribal community members. While lesbian, gay, bisexual, transgender/non-binary, queer/questioning, two-spirit, intersex, asexual, (LGBTQ2SIA+) students were not a specified focal group, many districts also engaged with LGBTQ2SIA+ students and faculty. Some additional examples of community engagement included:

- One district utilized a number of community engagement and culturally specific approaches. This included using chart sheets and sticky notes with staff, parents, and other partners to create real-time ideas for the SIA allowable use categories. Different colors of sticky notes were used to indicate different community partner groups. They also drew on a group of representative parent ambassadors, existing staff and community networks, social media, and other qualitative methods (surveys, interviews, and focus groups) to inform their SIA plan.
- In addition to surveying all students about how SIA funds should be utilized, a district dedicated time to conducting empathy interviews with students from the identified focal groups. Students were paired with staff they already had a relationship with at their school, so they would feel comfortable sharing their ideas and honest feedback about their school experience.
- Another district leveraged community partner organizations to help conduct listening sessions with student and parent groups. For example, they partnered with a Gay-Straight Alliance organization to facilitate a listening session for LGBTQ2SIA+ students that was facilitated by a community member who identified as a lesbian. These partner organizations already had built

up trust with the community members and helped increase turnout as well as supported community members so they would feel comfortable engaging in the listening sessions.

- An additional district formed a SIA Task Force made up of district staff and community leaders representing historically underserved populations. This Task Force facilitated listening sessions with targeted communities with postcard invitations and auto-dialers in multiple languages as well as partnering with community organizations. In addition to the listening sessions the Task Force also arranged empathy interviews with students experiencing homelessness and who identified as LGBTQ2SIA+.

While this engagement work is worthy of celebration there should also be a note of caution for what was unevenly implemented and what presented an opportunity for future learning and development. The continuation and improvement of authentic and consistent community engagement is as important as ever. To support SIA grant recipients to get or stay connected in ways that build trust with students, families, and the broader community through the SIA Plan Update process in late spring 2021, ODE released the [SIA Community Engagement Toolkit](#). The updated toolkit was aimed at 1) honoring the learning and work of the prior two years, 2) providing information that deepens the community engagement work called forward by the SIA and 3) offering useful and compelling tools to integrate community engagement work across other programs and initiatives - embedding this work in the fabric of districts and schools.

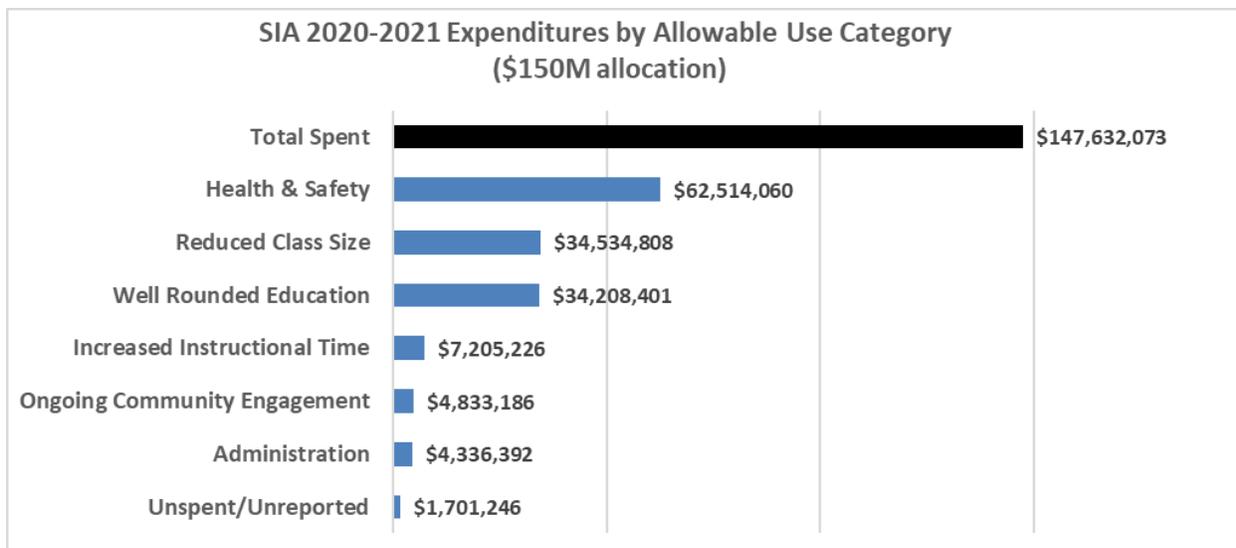
#### **SIA District and Charter Expenditures: 2020-21**

Again, in August 2020, the approximately \$472 million that was initially projected for the SIA grants in the first year of implementation was reduced through Legislative action in a special session to a total of \$150 million given the economic impact of COVID-19 on the Corporate Activity Tax.

Chart 1 below shows the 2020-21 SIA expenditures by districts and charters overall and for the six allowable use categories. Overall, 98.4% (\$147,632,073 of the \$150 million allocation) was spent in the first year of SIA. The remaining 1.6% (\$1,701,246) was left unspent by the districts and charters. Unspent funds are returned to the Fund for Student Success and reallocated to grantees in the following biennium.

Across the six allowable use categories, the largest share of expenditures went towards *Health & Safety* (41.7%; \$62,514,060 of the total allocation), followed by expenditures for *Reduced Class Size* (23.0%; \$34,534,808) and *Well Rounded Education* (22.8%; \$34,208,401). For the remaining three categories, *Increased Instructional Time*, *Ongoing Community Engagement*, and *Administration*, between 3% and 5% (\$4.3 million - \$7.2 million) was spent per category (see Chart 1 below).

**Chart 1. SIA 2020-21 Expenditures by allowable use category.**



When examining expenditures by the type of expense rather than allowable use area (see Chart 2 below), over three-quarters of all expenditures went towards *Salaries and Benefits* (76%; \$112,202,867). Of these salaries, just over half the amount (55.5%; \$62,312,890) was for Licensed Salaries, 9.2% (\$10,344,830) went toward Classified Salaries, and 5.9% (\$6,582,695) was for the combination of Administrative, Substitute, and Additional Salaries. The remaining 29.4% (\$32,962,452) was specified as going toward Benefits across all staff positions, though this amount is an underestimate of benefits as they could have been combined with, and designated as, salaries.

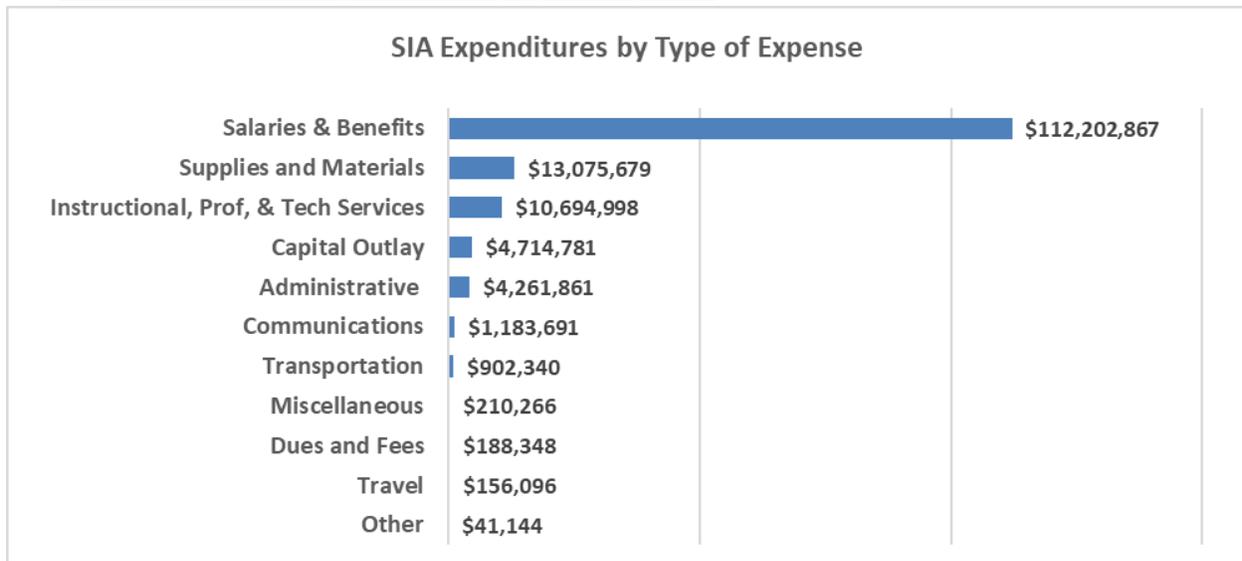
The amount districts and charters spent on other types of expenses was considerably less. For *Supplies and Materials*, 8.9% (\$13,075,679) was spent on items such as technology (approximately \$2.8 million), curricula (\$2.7 million), training materials mostly focused on issues of equity (\$2.1 million), and other items related to serving students who have historically experienced academic disparities such as eliminating fees for college courses and extracurricular activities, culturally relevant library books, and other supports (\$1.8 million).

For *Instructional, Professional, and Technical Services*, 7.2% of all expenditures (\$10,694,998) was spent largely on various partnerships and contracted services. For example, contracts for health and mental health services totaled approximately \$2.7 million, \$1.7 million was spent on partnerships with community-based and other organizations, and \$1.5 million for contracted professional development trainers focused primarily on equity, social-emotional learning, and math.

Capital outlays<sup>3</sup> accounted for an additional 3.2% (\$4,714,781) of the total expenditures during year one of the SIA. Just under half of the capital outlays (\$2.2 million) were related to issues of safety and security, while most other expenses were for new or renovated spaces for kindergarten transition programs and kindergarten, mental health counseling, health and wellness rooms, and modular classrooms.

For the remaining expenditures, 2.9% (\$4,261,861) went towards *Administrative* expenses (allowed indirect costs) and grant administration, while under 1% each went towards *Communications* (e.g., phones, internet; \$1,183,691), *Transportation* (\$902,340), *Miscellaneous* (\$210,266), *Dues and Fees* (\$188,348), *Travel* (\$156,096), and *Other* expenses (\$41,144).

**Gts Chart 2. SIA 2020-21 Expenditures by type of expense.**

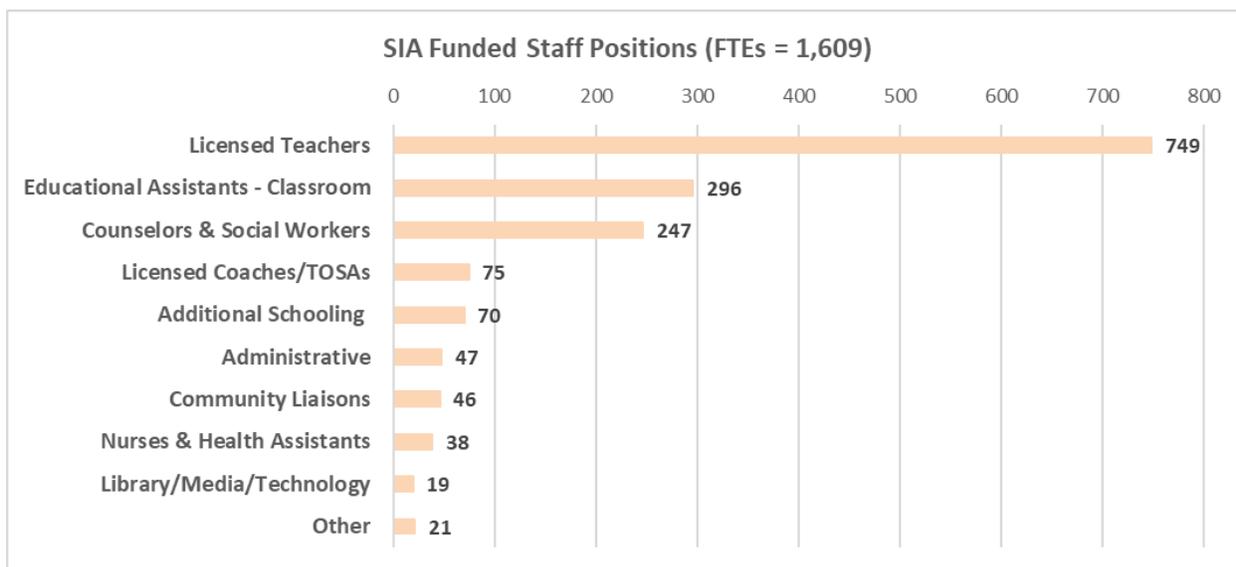


**SIA Funded Staff Positions in Districts and Charters**

As mentioned above, SIA expenditures for *Salaries and Benefits* totaled \$112,202,867 during the first year of SIA. Further analysis indicated that this amount funded a total of 1,609 full time equivalent staff positions. These 1,609 FTEs were then categorized into 10 staff categories (see Chart 3 below).

<sup>3</sup> Capital outlays that are directly related to improving student health or safety are allowable with SIA funds. All other capital outlays are required to show evidence of the following before being approved as allowable with SIA funds: 1) identify how capital outlay meets the intent of the SIA and is within the allowable use areas, 2) describe community engagement and input that elevated the need for the capital outlay, and 3) articulate how an equity lens was applied in choosing the capital outlay as a priority to address equity-based disparities of student outcomes.

**Chart 3. SIA funded staff positions (FTEs) during 2020-21.**



The most common staff position hired with SIA dollars was *Licensed Teachers* (FTEs = 749), accounting for nearly half (46.6%) of all SIA funded positions. Within this category, the most common type of teacher was general education or unspecified teachers (FTEs = 372), social-emotional or behavioral teachers (FTEs = 148), and special education teachers (FTEs = 105). Also of note were SIA funded teachers in physical education (FTEs = 37), English language development (FTEs = 36), music/art (FTEs = 25), literacy (FTEs = 21), STEM-related (FTEs = 11), and CTE-related (FTEs = 8). Assisting classroom teachers were 296 FTE *Educational Assistants* funded through SIA, which was the second largest category of positions (18.4%, see chart 3 above).

The third largest category of staff positions was licensed *Counselors & Social Workers* (FTEs = 247, 15.3%). Although the specific type of counselor was not required to be documented in the first year of SIA (it is required in subsequent years), some could be determined through the information provided. While 100 FTE *Counselors & Social Workers* were unspecified, at least 118 FTEs were designated as licensed mental health professionals. An additional 29 FTEs were designated as school or guidance counselors.

*Licensed Coaches/TOSAs* and staff involved in *Additional Schooling* (e.g., before/after school, summer school) accounted for 75 FTEs (4.6%) and 70 FTEs (4.4%), respectively. The remaining SIA funded staff positions, accounting for less than 3% each of all positions, were *Administrative* (FTEs = 47), *Community Liaisons* (FTEs = 46), *Nurses and Health Assistants* (FTEs = 38), *Library, Media, and Technology* (FTEs = 19), and *Other* staff positions (FTEs = 21).

## Monitoring & Evaluation Framework

Public approval and accountability processes are a core component built into the SIA statute.

[ODE communicated](#) core values to guide its development of a framework to implement this aspect of the law including:

1. **Monitoring and evaluation is central to learning.** Supporting the development and use of measures that are authentic, ambitious and realistic, and consider student and system growth over time is essential to support system learning and successful SIA implementation.
2. **Context matters.** Oregon has several districts with more than 10,000 students. It has almost as many districts with fewer than 10 students. Approaches to the development and monitoring of longitudinal performance growth targets must be flexible, responsive and adaptive.
3. **Center the two core purposes of the SIA to improve student health and well-being and achieve equity-based outcomes in student learning.** Provide support and name challenges to advance this work with integrity.
4. **Progress is not linear and all measures of progress are not created equal.** We have the opportunity to develop and grow an approach to monitoring and evaluating systems for district learning and performance.

There are seven distinct performance measures and processes used in the monitoring and evaluation process for implementation under the SIA:

1. Longitudinal Performance Growth Targets (LPGTs)
2. Progress Markers
3. Local Optional Metrics
4. Quarterly and Financial Reporting
5. Annual Reporting
6. Auditing (SIA funds only)
7. Performance Reviews

As part of the initial application submission, districts and eligible charter schools were able to submit draft LPGTs and optional local metrics which were not reviewed as part of the application. However, as noted above, LPGTs were released for the 2020-21 school year, meaning that SIA grantees were not required to co-develop, nor monitor LPGTs in the first year of implementation. Additionally, the handful of districts and schools that initially submitted draft local optional metrics opted not to set these in the first year of implementation given the reduction in funding as well as the impacts of COVID-19.

A singular set of [progress markers](#) were developed for the 2020-21 school year, integrating the kinds of changes ODE believes could advance each of the common metrics in the SIA long-term. The progress markers are a mechanism to support a developmental approach to evaluation with a focus on learning about the kinds of changes that happen from distinct investments.

The progress markers framework was developed through rounds of engagement with leading experts in each common metric, including practitioners, and policy advocates. The framework was further refined to adjust for the significant impacts associated with the ongoing public health crisis caused by COVID-19 and to integrate how schools will approach their core responsibilities in the 2020-21 school year.

Beginning in January 2021 and continuing approximately each quarter thereafter, SIA grant recipients were required to submit programmatic and financial progress reports to ODE to monitor progress and complete spending prior to the end of the grant period. In the programmatic progress report, recipients detailed their progress on SIA plan activities and the kinds of changes that are unfolding. Within the financial progress report, grantees shared their progress on spending SIA funds and accounted for any adjustments they've made to the original plan in light of the reduction in funding. For the 2020-21 school year, reports were due on the following dates:

- First progress report: January 31, 2021 covering July 1, 2020 - December 31, 2020
- Second progress report: April 30, 2021 covering January 1, 2021 - March 31, 2021
- Third progress report: August 31, 2021 covering April 1, 2021 - June 30, 2021 for grantees without a summer extension and November 30, 2021 covering April 1, 2021 - September 30, 2021 for grantees with a summer extension

SIA grant recipients were also required to review their progress on an annual basis through a cumulative progress report and a financial audit. The annual progress review asked grantees to review their implementation efforts and how their strategies worked (or didn't). Grantees also had the option to share changes in behavior and mindsets they were noting within the progress markers. Grantees were required to submit annual reports by September 30, 2021 if they did not have a summer extension and November 30, 2021 if they did have a summer extension. Under Section 15 of the Act, SIA grant recipients are required annually to conduct a financial audit of the use of grant funds in accordance with the Municipal Audit Law. Both the annual progress report and annual financial audit must be made available in the main office and posted on the grantee's website; presented to the governing body of the grantee at an open meeting with the opportunity for public comment; and submitted to ODE. Grantees are required to submit board meeting minutes for the first financial audit by January 31, 2022.

## RESOURCES, SUPPORT, & COACHING

### Impact of ESD liaisons

Section 25 of the [Student Success Act](#) describes and HB 5047 authorized ODE to disburse up to \$24 million for use by all 19 ESD regions to provide technical assistance to school districts in their region, supporting SIA application development, early implementation of activities, and coordinating between districts and ODE. Funding was allocated based on a funding formula. During the August 2020 special session, the funding for ESD Technical Assistance was reduced to \$20 million.

Each Education Service District (ESD) has identified a staff member or contractor who is allocating at least 0.25 FTE towards the role and function of being a Liaison - the primary point of contact and collaboration - between the Office of Education Innovation and Improvement, the ESD they represent, and the districts within the ESD's service region. ESD Liaisons participate in biweekly calls with ODE staff to learn more about the process, ask questions, and provide feedback on guidance and resources before it's released to districts. ESD Liaisons have also collaborated across regions to develop and share materials to support districts with community engagement, data, and progress reporting.

As part of the ESD grant agreement, for the 2019-21 school year, ESDs were required to submit the following deliverables:

- Comprehensive Support Plan, which details the support and technical assistance that each ESD will provide to schools districts in their region to support the development, implementation, and review of the districts' SIA plans and has been approved by each participating school district in their region.
- Documentation that the Comprehensive Support Plan has been adopted and incorporated into the ESD Local Service Plan (LSP).
- Annual financial report of expenditures for the 2019-20 and 2020-21 school years.

In the annual reports submitted to ODE, ESDs noted a number of changes to their practices, including:

- "Our ESD was able to provide many services for our component districts including training for community engagement practices, on-demand access to translation services, including translation for health reports for parents and an online on-demand paraeducator training and staff training for trauma-informed practices. Regularly scheduled SIA meetings hosted by our staff offer a space and time where districts know they can receive support and information."
- "Regional staff were supported through the ESD to complete a bias survey when working with students struggling with mental and behavioral health concerns and this information was used to focus the plans for professional learning."
- "We have led a Better Together collective effort in our region designed to focus on the most historically underserved students and families, bringing voice and increased engagement."
- "The biggest impact has been in the way we engage with - and listen to - the families we serve. We have conducted more empathy interviews than ever before and are directly integrating the insights and learnings from these interactions into our Strategic Plan."
- "With the focus of SSA spanning mental and behavioral health, academic achievement, and addressing disparities for historically underserved populations, it is an ideal situation for

strengthening the practice of collaborating across multiple areas of service. Through last year, during our work to understand and support the priorities each district was including in their Student Investment Account plans, we spent time analyzing how each area of our organization could contribute to technical assistance.”

- “We also have a more intentional focus on data including supporting improvements to data collection, quality, analysis, and data-driven decision-making. We are working closely with our district data teams to understand the importance of entering quality data, interpreting results, and utilizing data to guide instructional practice and school/district policy decisions.”

In the last Legislative session, [SB 225](#) passed, adjusting the ESD TA formula for determining allocations for the 19 ESD regions. Essentially, this built in floor funding for the smallest ESD regions, increasing their allocation by five times the amount received in the 2019-21 biennium.

### **Technical Assistance and Coaching Programs**

All eligible applicants have access to technical assistance (TA), provided by ODE staff, through regional supports coordinated between ESDs and ODE, or through external contractors. Over the long-term, ODE TA will be responsive to the needs of districts and designed to support systems improvement, for example:

- Identification of and support for best practices for meeting Longitudinal Performance Growth Targets;
- Attention to cultivating and deepening community engagement and equity driven decision-making;
- Identification of and support for implementing promising practices; and
- Attention to and tracking of shifts in behavior, policies, practices, and work.

Sections 17 and 18 of the Student Success Act established two distinct but related “coaching” programs which are intended to provide capacity building, system improvement supports, and accountability structures to support SIA implementation.

The *Intervention and Strengthening Program (ISP)* is the general coaching program outlined for grant recipients who do not meet Longitudinal Performance Growth Targets. Each biennium ODE is expected to monitor and determine if a grant recipient does not meet the LPGTs identified in the grant agreement. If a grant recipient does not meet the LPGTs, the grant recipient may submit an explanation for the reasons why the targets were not met. After taking into consideration the explanation submitted by the grant recipient, ODE may require the grant recipient to enter into the ISP - the coaching program described in section 17 of Act. If required, participation in the coaching program must be for at least one year, unless the department allows for a shorter period of time.

Under the program, the department shall advise and counsel grant recipients on how to meet LPGTs and shall assist grant recipients with ongoing professional development and peer collaboration. The act does provide ODE the ability to direct the expenditure of SIA funds as the strongest form of intervention within this program. The principles, staffing, and contracting approach for this program is underway. The

earliest engagement with grant recipients under this program is anticipated for Summer and Fall of 2022, given the release of the LPGTs for the 2020-21 school year. The ISP program is for districts, charter schools they sponsor in the SIA application, and charter schools that have applied and are receiving SIA funds independently. For the 2020-21 school year, the funding for general technical assistance and coaching was reduced from \$4,531,000 to just over \$811,000.

Given the release of the LPGTs for 2020-21 and the reduction in funding, ODE moved forward with a Request for Proposals (RFP) process in spring 2021, resulting in two contracts awarded. Currently, ODE is working with two vendors to create two learning series - 1) Community Engagement Practices and 2) Equitable Mindsets, Practices, and Systems - to support all districts and schools in Oregon. ODE anticipates these modules will be available to educators across Oregon in Fall 2022. To further build out the ISP, a second RFP will launch in winter 2022. The RFP will request proposals for additional coaching supports in several focal areas including: early literacy, middle school literacy, fiscal stewardship, and integrated systems of mental and behavioral health. It is anticipated that selected vendors will begin providing coaching services during the 2022-23 school year.

Section 18 of the SIA established an *Intensive Coaching Program (ICP)* for school districts with the highest need for support and intervention. This intensive program is invitational, and only public school districts are eligible to receive an invitation to participate. School districts that accept the invitation agree to participate for at least four years. In addition, districts that agree to participate are eligible for additional funding from the Statewide Education Initiatives Account (SEIA). A total of \$12 million is included in the Grant-in-Aid section of the SEIA for the additional funding for these districts; however, this was reduced to \$4 million in the August 2020 special session.

From the General Fund, this program received \$293,895 and \$1,800,748. Other Funds were approved for three positions (2.30 FTE) and \$1,502,605 for needs assessments, contract members of the teams, and onsite assessments for participating districts.

The ICP creates Student Success Teams (SST) as outlined in the Act. Administrative rules passed by the State Board of Education with input from ODE's Rules Advisory Committee established that each Student Success Team for a participating district would include a broad Advisory Body and a seven-member Stewarding Body. The Stewarding Body includes individuals internal and external to the district - the superintendent, a board member, a teacher, an ODE point person, and three stewards who support the district in leadership, teaching and learning, and community outreach and advocacy. Student Success Teams provide advice and counsel through recommendations on how to work collaboratively with the community and other stakeholders and improve performance outcomes to meet longitudinal performance growth targets. According to statute, participation in the ICP requires that districts:

- Commit to regular student success plan meetings to monitor practices
- Use data to track student progress
- Ensure employees receive professional learning and training
- Create safe and inclusive learning environments
- Improve school and school district practices and structures to support teaching and learning

- Improve the skills of the members of the school board
- Accept all recommendations of the Student Success Teams related to the use of SIA grant moneys and any additional funding received under this section
- Consider all recommendations of the Student Success Teams for any district operations

In order to determine the districts to be invited, ODE developed an index of high-need school districts using a combination of student outcome data as well as student demographic data. Models considered various weighting of outcomes and demographics in the development of the index.

ODE initiated conversations with the first five districts identified and invited them to participate in the program. Formal invitation letters were sent to both the superintendent and the school board chair. ODE staff were invited to share more about the program and met with various configurations of school boards, advisory meetings and school district administrative teams. Ultimately, three school districts declined participation citing concerns about the newness of the program, school boards' unwillingness to cede decision making around SIA funding to the SST, and a perceived potential negative impact on prior community engagement efforts under the SIA. Two districts accepted the invitation to participate in the program with an anticipated start date of Fall 2021.

As of this writing, grant agreements for the program have not yet been finalized. ODE has faced significant challenges in procurement services. The structure of the Intensive Coaching Program offered unique challenges in drafting grant agreements that meet legal sufficiency requirements for the program. Unlike other grant-in-aid programs, the Intensive Coaching Program offers additional grant-in-aid for recipients, but the funds are only usable through recommendations from the Student Success Teams. This impedes the ability to develop allowable uses and budgetary considerations common in other grant-in-aid programs.

ODE is in the process of procuring external contractors to serve as stewards to support each participating district. Traditional procurement practices provided ODE staff with additional challenges. Multiple postings through the Oregon Procurement Network (ORPN) and Oregon Buys produced very few viable contracting opportunities given the unique need of individual providers who responded to the procurement opportunity. ODE has since moved forward with a special procurement and is nearing the execution of contracts with six individuals who will each serve as stewards for one of the participating school districts.

Additional challenges have just recently been identified by the Department of Justice pertaining to public meeting law and the ability for ODE staff and stewards to meet to discuss progress and approaches for the work. Legal counsel has determined that public meeting rules apply because the Student Success Team is making formal recommendations to the school board of participating school districts and these recommendations must be accepted and implemented. This includes counsel that as few as two individuals meeting together to discuss this body of work would establish a quorum of a public body. ODE staff is currently working on procedures to account for publicly noticing of meetings and to develop new procedures to administer the program in accordance with public meeting law.

Within the agency, ODE has invested in internal alignment work to better support participating districts across ODE programs and initiatives. Groups of ODE staff who support programs being implemented in the two participating school districts meet monthly to share updates, align strategies, and integrate process requirements. Early feedback touts these meeting structures as highly beneficial in supporting successful implementation of the various programs.

Despite the challenges in developing and implementing a new approach to supporting school districts, the program shows tremendous promise. While other states' models of supporting districts with similar needs are punitive and often result in a combative dynamic, the Intensive Coaching Program aims to collaboratively work with districts— alongside their community in the spirit of the Student Investment Account— to provide deeper support and funding to build capacity in the districts that need it most. Also, while other states' models often rely on a single coach, the Intensive Coaching Program builds a broad base of support for participating districts— from stewards safeguarding a key perspective in the district's decision making process to their Advisory Body that draws from the community to the designated ODE Point Person to build internal alignment at ODE to support the district's work. This is the early stage of this program but these initial districts will pave the way for additional districts which will be invited into the program in the Spring of 2022.

## WHAT'S AHEAD

### **Making the Right Work Easier and the Integration of Six Programs**

The Student Success Act Budget Bill (HB 5047) included a budget note directing “The Oregon Department of Education to explore the potential for combining grant applications, grant agreements, grant monitoring, and reporting for the School District Investment grants established in House Bill 3427 with other programs or grants administered by the agency including grants made from the High School Graduation and College and Career Readiness Fund (Ballot Measure 98), Title I grants where appropriate, and other grant programs identified by the agency.”

Bringing these six programs together operationally<sup>4</sup> creates significant opportunities to improve outcomes and learning conditions for students and educators. Working within existing state statutes and administrative rules, ODE developed a framework for success that meets and retains the core purposes of each program while trying to create a stronger framework from which we can mark progress, look for long-term impacts, and develop the learning approach to monitoring and evaluation that is a hallmark of high-performing educational systems<sup>5</sup>.

In working to implement this note, ODE will shift the timeline for Continuous Improvement Planning (CIP) submission to the spring of 2023. This adjustment will support the alignment of engagement and planning processes with other initiatives.

ODE will release new guidance in February 2022 to integrate guidance on six aligned programs and district responsibilities:

1. High School Success (HSS)
2. Student Investment Account (SIA)
3. Continuous Improvement Planning (CIP)
4. Career and Technical Education - Perkins V (CTE)
5. Every Day Matters (EDM)
6. Early Indicator and Intervention Systems (EIS)

The guidance will give districts, ESDs, partner community colleges, charter schools, and community partners the proactive time needed to prepare and digest this effort to operationally align these state and federal programs. The planned sequence is as follows:

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<sup>4</sup> Six programs is nowhere close to the 108 federal and state programs ODE administers and there is natural alignment with more than just the six programs this guidance covers. This effort reflects where operational alignment could be reached amidst programs with shared aims, statutory language, and program designs without requiring changes in statute.

<sup>5</sup> Schleicher, A (2018), World Class: How to build a 21st-century school system, Strong Performers and Successful Reformers in Education, OECD Publishing, Paris. [https://www.oecd-ilibrary.org/education/world-class\\_9789264300002-en;jsessionid=HRciZIUdeixTVOCU-0Aj4Qf.ip-10-240-5-132](https://www.oecd-ilibrary.org/education/world-class_9789264300002-en;jsessionid=HRciZIUdeixTVOCU-0Aj4Qf.ip-10-240-5-132)

- **Spring 2022: Learn & Prepare** - Time to digest this new guidance and do internal planning and budgeting to support the planning and engagement processes that follow.
- **Fall 2022: Engage & Assess** - Engage community, focal student groups, families, Tribes, and educators. Identify patterns in community feedback and data while completing a comprehensive needs assessment.
- **Fall/Winter 2022: Develop & Plan** - Review engagement input, apply equity lens; consult the best practice recommendations from Quality Education Commission (QEC) reports and SSA Student Success Advisory Plans; consider ESSER III engagement feedback; review regional labor market information and regional CTE priorities with CTE regional coordinator; create plan and budget; use continuous improvement tools to workshop and develop plans, budget, and application - include outcomes, strategies, activities, and growth targets.
- **Jan-Feb 2023: Finalize** - Produce Integrated Budget, Plan and Application; post to community for comment, present and have board approve prior to submission.
- **March 2023: Apply** - Application Window opens from Wednesday, March 1 through Friday, March 31 submitting four-year plans covering 2023-2027 with budgeted and focused plan for the 2023-25 biennium.
- **April 2023: Review** - ODE reviews applications, co-develops and finalizes required targets while engaging community and educators through Quality Assurance Learning Panels (QALP)
- **July 2023: Grants Finalized**: Grant agreements finalized for all relevant programs and implementation begins.

### **Further Collaboration and Strengthening of ESD Liaison Roles**

ESDs provide a variety of services and support to Oregon’s school districts and communities. ESDs have a distinct role in Oregon’s education system.

ODE has an opportunity to build on the work of the last two years to further strengthen coordination efforts between ODE and each ESD region by further aligning goals and outcomes of “like-initiatives” to support better braiding of resources and shared focus on key goals and outcomes. Rather than singular roles - small teams of different sizes within each ESD will form with clear coordination and joint meetings across the programs aligned and documented. While this won’t cover every initiative, it is a step down the path towards further alignment, coordination, and coherence.

During the 2021-23 biennium, ODE will be working closely with ESD partners to align a revised contract that brings different resource allocations together under a single contract to further support shared planning, roles, and work effort. The resources aligned in this contract will include ESD Technical Assistance funding, HSS funding, EDM funding, ESSA Partnerships funding, and Governor’s Emergency Education Relief (GEER) funding. As part of this shift, ESDs will be required to hire at least a 1.0 FTE in the Liaison role to support districts in their region. The SIA/SSA grant agreement would be amended to more fully describe the work ESD would take on - including exhibits that detail the overall coordination and the details of supporting the whole and the specific needs within each body of aligned support. ODE anticipates that grant amendments for ESDs detailing these changes will be executed in spring 2022.