



LEGISLATIVE REPORT

Division 22 and 24 Standards Review and Recommendations for the Oregon Department of Education

Northwest Comprehensive Center

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Executive Summary

In 2025, the Oregon State Legislature passed Senate Bill 141 (SB 141, the Education Accountability Act), directing the Oregon Department of Education (ODE) to work with an external entity to review the administrative rules that establish standards for school districts (Division 22) and education service districts (Division 24). There are 59 individual administrative rules in the Division 22 standards and 29 in the Division 24 standards (see Appendix A in the report for a complete list of these standards). The standards are intended to promote statewide consistency and equity while preserving local flexibility. The Legislature requested recommendations on which standards to prioritize, which to remove or revise, how to monitor and enforce compliance, and how to improve the noncompliance reporting and resolution process.

ODE engaged the Northwest Comprehensive Center (NWCC) to conduct this review using multiple methods: an analysis of all 59 Division 22 standards, interviews and focus groups with stakeholders across Oregon, a survey of ODE rule owners, and a comparative analysis of administrative rules and accountability systems in 13 other states.

Key Findings

Oregon lacks a consistent process for reviewing standards. Division 22 and Division 24 standards have expanded incrementally over many years. As a result, they contain overlapping requirements, inconsistent expectations, and varying connections to student outcomes. ODE staff members who work closely with Division 22 rules reported that most standards require modernization, clarification, or structural revision. Few comparable states have similarly broad collections of statewide administrative rules.

About half of Division 22 standards focus on student outcomes. Thirty standards directly address or influence positive student outcomes. These standards are clustered around academic infrastructure, targeted interventions for special populations, and student safety and well-being. These were consistently prioritized across all data sources. By contrast, 29 standards focus primarily on administrative and planning requirements or reporting processes—important governance functions but not appropriate as statewide minimum standards.

Many Division 24 standards are outdated or obsolete. Stakeholders and system leaders consistently described Division 24 as misaligned with the current role of education service districts (ESDs), retaining provisions eliminated by statute as far back as 2011 and failing to connect accountability to district or student outcomes.

The accountability process is reactive and reliant on self-reporting. The existing system is driven by complaints and dependent on unverified district assurances. Rule owners identified a persistent gap between what districts report and what data show. Multiple stakeholder groups called for a shift to proactive monitoring grounded in observable indicators and for ODE to act as a partner in improvement rather than a compliance enforcer.



Complaint processes are difficult to navigate and insufficient on their own. The public is generally unaware of the existing complaint pathways or it struggles to access and use them. Participants broadly agreed that complaint systems should be more accessible and multilingual and that all attempts should be made to resolve complaints locally before escalation to ODE.

Recommendations

These recommendations are organized under three high-level themes that respond directly to the legislative intent behind SB 141.

Establish a statewide framework for evaluating the standards. NWCC recommends that ODE establish a framework for adding, revising, consolidating, or removing standards. This framework should be based on clear, evidence-based criteria that are aligned to Oregon’s five student success priorities and should be developed through inclusive stakeholder engagement with the State Board of Education, districts, ESDs, families, and legislators. Because Oregon currently has no structured, recurring process for evaluating whether existing standards remain fit for their intended purpose, standards have accumulated over decades without coherent framing. This has resulted in an overly burdensome system that is disconnected from student outcomes.

Structure standards to create an outcomes-focused framework. Division 22 should be restructured to retain only essential, binary, and clearly measurable standards with a direct connection to student outcomes (e.g., graduation requirements, educator licensure, safety facility, special education). Standards focused on educational quality (i.e., those that exist on a continuum and require professional judgment) should be relocated to a separate regulatory school quality framework built around Oregon’s five student success priorities, monitored through a shared statewide rubric, and subject to annual local board review. Division 24 should remove obsolete provisions and reposition the local service plan as the central accountability mechanism, tying ESD accountability to district and student outcomes through a biennial performance cycle. The current approach, which treats all standards as equivalent compliance items, conflates minimum floors with continuous improvement, generating administrative burden without educational meaning.

Integrate standards accountability with a monitoring system for continuous improvement. In any subsequent Division 22 revisions, rather than creating new reporting requirements, ODE should align accountability with existing SB 141 initiatives (i.e., Unified Application, Continuum of Supports, regional support teams). Districts could then use a common rubric to assess and publicly report school quality annually to local school boards and ODE, shifting from binary self-reported assurances to evidence-based reflection. ODE should also reorient toward differentiated support, providing tiered technical assistance before formal intervention and reserving graduated enforcement for persistent, unresolved noncompliance. Accessible, multilingual complaint pathways should complement, not drive, this broader accountability system. Effective accountability systems distinguish between compliance with non-negotiable minimums and the pursuit of quality, while also supporting improvement rather than incentivizing concealment.



Looking Ahead

Together, these recommendations create a path to modernizing Oregon's standards system while preserving local flexibility and strengthening statewide accountability. This approach should not be viewed as prescriptive but rather as a starting point for ODE to collaborate with partners in making meaningful, sustainable change, ensuring every student experiences the conditions necessary for success.



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Introduction

Oregon has long recognized that every student deserves access to a high-quality public education regardless of where they live. Within the Oregon Administrative Rules for the Oregon Department of Education (ODE), Division 22 (ORS 327.103) establishes statewide minimum expectations that school districts must meet to ensure students have access to essential educational opportunities, while Division 24 (ORS 334.217) establishes requirements for education service districts (ESDs) to support districts within their service areas. There are 59 individual administrative rules in the Division 22 standards and 29 in the Division 24 standards (see Appendix A for a complete list of these standards). Together, these standards define Oregon's educational floor by establishing common expectations for student access, health and safety, instructional opportunities, and core operational requirements.

In 2025, the Oregon State Legislature passed Senate Bill 141 (SB 141), known as the Education Accountability Act, to examine whether Oregon's standards and accountability system align with student success. Part of the legislation directs ODE to work with an external entity to review the Division 22 and Division 24 standards and identify:

- Standards that best support student outcomes and should be prioritized by ODE and districts
- Standards that make less significant contributions to student outcomes and may no longer warrant inclusion as statewide minimum requirements
- Effective methods for determining and enforcing whether districts are meeting standards
- An improved process for receiving, investigating, and resolving complaints related to noncompliance with standards

ODE partnered with the Northwest Comprehensive Center (NWCC) to conduct this review. Together, ODE and NWCC designed the scope of the review, examined the history and context of the state's district and ESD accountability standards system, identified key stakeholder groups to inform the review, and developed the lines of inquiry necessary to address the legislative requirements. NWCC independently collected and analyzed the data to identify findings and develop recommendations.

This report summarizes the major findings and recommendations related to the four requirements established in SB 141. For details on the methodology, findings, implementation considerations, and supporting resources, see the accompanying technical report.

A Shared Responsibility: Creating a More Coherent Support and Accountability System

Divisions 22 and 24 standards have evolved over many decades through legislation, administrative rulemaking, and responses to emerging educational priorities. As a result, the current set of standards contains requirements that vary considerably in purpose, importance, and relationship to student outcomes. Some standards establish essential minimum expectations that should be met



regardless of local context, while others describe broader dimensions of educational quality that are better addressed through continuous improvement. The review directed by SB 141 was designed to clarify these distinctions so that Oregon's accountability system remains focused on the educational experiences and outcomes that matter most for students.

Throughout the review, stakeholders consistently emphasized that Oregon needs both strong statewide minimum standards and a robust framework for continuous improvement. These functions serve distinct but complementary purposes and should be supported through different accountability approaches.

Statewide minimum standards establish the non-negotiable conditions every student should experience, including instructional time, graduation requirements, educator qualifications, student health and safety protections, and equitable access to educational services. Other standards attempt to promote educational quality by requiring specific practices, policies, or processes intended to influence areas such as school climate, family engagement, student belonging, leadership, and organizational learning. While these dimensions are critical to student success, they exist along a continuum and are often highly contextual. Stakeholders consistently noted that these aspects of quality cannot be advanced through uniform compliance requirements alone and are better supported through continuous improvement and local decision-making.

The review also reaffirmed the shared responsibilities of Oregon's education partners. The Legislature establishes statewide educational priorities; the Oregon State Board of Education adopts administrative rules to implement those priorities; and ODE provides guidance, technical assistance, monitoring, and accountability. As regional partners, ESDs build local capacity and provide specialized services, while school districts and their governing boards implement programs that respond to community needs. Families, students, educators, Tribal governments, and community organizations play essential roles in shaping priorities, monitoring implementation, and strengthening accountability. These shared responsibilities reflect Oregon's long-standing commitment to balancing statewide consistency with local control while ensuring equitable educational opportunities for all students.

The recommendations in this report are not intended to create additional layers of oversight or replace ODE's ongoing efforts to modernize educational support and accountability systems. Stakeholders consistently expressed support for reducing duplication, improving clarity, and creating a more coherent system that allows districts to spend less time demonstrating compliance and more time improving student outcomes. The recommendations therefore align with and strengthen ongoing initiatives such as the Unified Application, Continuum of Supports, regional support structures, and other improvement efforts underway through SB 141 implementation. More broadly, the review highlights that the responsibility for continuously improving Oregon's education system rests with all educational partners and requires ongoing collaboration among state agencies, regional providers, local districts, educators, families, and communities.



At its core, this report is grounded in a simple principle: Students benefit when the state clearly defines the minimum conditions every learner should experience and supports districts to continuously improve the quality of those experiences. The recommendations seek to clarify statewide priorities; strengthen implementation; align accountability with student outcomes; and create a more transparent, supportive, and coherent educational system that better serves students, families, educators, districts, and communities across Oregon.



Methods and Data Sources

To conduct this review, the NWCC engaged in a series of data collection and analysis activities:

- **Analysis of current Division 22 standards** on a range of criteria, including their relation to student outcomes and measurability (i.e., whether the standard can be meaningfully verified through a monitoring process).¹
- **Stakeholder engagement** including interviews and focus groups, to understand the strengths and weaknesses of Division 22 and 24 standards from various perspectives.
- **Survey of rule owners** (i.e., the ODE staff members responsible for overseeing and administering Division 22 standards) to capture perspectives on standards design, implementation, and enforcement.
- **Comparative state analysis** of analogous standards and accountability systems across 13 states identified by NWCC and ODE to understand the national landscape. We focused on five states for the standards comparison and eight states for the accountability system comparison, with no overlap between the two groups.

Table 1 identifies how each data collection and analysis activity informed findings and recommendations for each of the review requirements established in SB 141.

Table 1. Crosswalk of data sources to legislative review requirements

Legislative requirement	Standards analysis	Stakeholder engagement	Rule owner survey	State comparison
Standards that best support student outcomes	✓	✓	✓	✓
Standards that contribute less significantly to student outcomes	✓	✓	✓	✓
Effective methods for determining whether a district is standard		✓	✓	✓
Complaint process for noncompliance		✓	✓	✓

Source: Authors' analysis; [Oregon Legislative Assembly Senate Bill 141, 2025 Regular Session](#), relating to education; and declaring an emergency.

For more details on the methodology, findings by data source, and recommendations with implementation considerations, see the accompanying technical report.

¹ The NWCC review team determined that applying the same standards analysis to Division 24 would not be appropriate because Division 24 rules are far removed from student outcomes and largely binary in measurement. Instead, the team drew on an analysis of Division 24 standards conducted by Gary Peterson, past director of the Oregon Association of Education Service Districts, in 2023.



Foundational Finding and Recommendation Across the Division 22 and 24 Standards: Establish a Formal Standards Review and Governance Process

The most salient finding from this review is that Oregon currently lacks a structured, recurring process for evaluating whether existing standards continue to serve their intended purpose. Similarly, there is no process to evaluate potential standards before formal adoption or to evaluate related legislative mandates that districts or ESDs must follow but that do not fall under Division 22 or Division 24. Standards have accumulated over time without a review and governance process for determining if they remain necessary, achieve their intended effect, or are well matched to their policy mechanism.

Based on review findings, **NWCC recommends that ODE establish clear criteria and a process to guide decisions about adding, revising, consolidating, relocating, or removing standards.** (See Appendix E in the technical report for a table that summarizes the findings from the analysis. This table can be used as a starting place for assessing how standards meet defined criteria).

ODE should gather feedback on the criteria and process from the Oregon State Board of Education, school districts, ESDs, families, and legislators, then incorporate the feedback as appropriate. The final criteria should prioritize student outcomes and focus on the evidence base, feasibility, measurability, implementation burden, and equity impact of each standard. Furthermore, the criteria for inclusion should reflect ODE's five [Priorities for Student Success](#), which are the domains for how the current standards are organized: 1) high-quality learning experiences for all students, 2) aligned and focused educational systems, 3) engaged partners and communities, 4) safe and inclusive schools, and 5) committed and supported staff.

This process would ideally begin with an initial criteria-driven review of all existing Division 22 and 24 standards and would thereafter apply to any proposed new legislation affecting standards before it is adopted. Criteria and transparent decisions with documented stakeholder input would help build the trust and buy-in needed for effective implementation across Oregon's diverse district contexts.

For the purposes of this review, NWCC applied a set of criteria to the existing Division 22 standards and provides recommendations for which standards to retain in Division 22 and which to remove. The recommendations offer a starting point for this work and should not be seen as a final solution. Developing the final criteria and review process will require a comprehensive, inclusive approach that engages Oregon's major educational stakeholders and partners, including educators, district and school leaders, students, families, community organizations, Tribal nations, advocacy organizations,



and policymakers. Broad engagement will ensure that revisions to Division 22 and 24 are rigorous, equitable, practical to implement, and reflective of Oregon's diverse educational contexts.

Significant additional analysis, stakeholder input, and greater specificity will be needed to finalize a standards review and governance process. Within 12 months of receipt of this report, ODE and its collaborators should develop a codified standards review and governance process to provide the structure, oversight, and continuous improvement foundation necessary to guide future work.



ORS 327.103 (Division 22) Standards Review Findings and Recommendations

Division 22 standards establish statewide minimum expectations that school districts must meet to ensure students have access to essential educational opportunities.

Findings

This section presents key findings drawn from the analysis of Division 22 standards, stakeholder engagement, the survey of rule owners, and the comparative state analysis.

Thirty Standards Directly Impact Student Outcomes

Of the 59 Division 22 standards, the analysis found that 30 directly impact student outcomes. These 30 student-facing standards reflect three general categories:

- **Academic infrastructure:** diploma requirements and pathways, instructional time, curriculum, instructional materials, assessment systems, educator quality, career education, and class size
- **Targeted interventions for special populations:** special education services, modified and extended diploma pathways, dyslexia screening and professional learning, and assessments for English learner students
- **Student safety and well-being:** suicide prevention, substance use prevention, health services, school counseling, concussion safety, restraint and seclusion protections, sexuality education, and Every Student Belongs

These three categories and the 30 standards that fall within them are reinforced by multiple data sources as high priority for continued inclusion in the Division 22 standards. Stakeholders consistently identified diploma and health and safety requirements as worth preserving. Rule owners confirmed that standards tied to graduation, early literacy, and assessment have the strongest alignment to Oregon's performance growth targets. The five-state comparative analysis found the greatest cross-state consistency with Division 22 standards situated in the Aligned and Focused Educational Systems domain—particularly special education and personnel standards—suggesting these represent a recognized national floor for outcomes-focused regulation.

Twenty-Nine Standards Have Little or No Direct Impact on Student Outcomes

Findings from multiple sources suggest that Oregon's standards have expanded over time without a process for review or removal, leaving several standards serving mainly operational purposes with only indirect ties to student outcomes. The analysis found that eight standards were assessed as having no direct impact on student outcomes. Instead, they govern internal district operations, documentation, and administrative compliance. Additionally, 21 standards were assessed as



moderately impacting student outcomes. These standards influence the student experience indirectly and require multiple implementation layers before reaching students.

Stakeholders further reinforced these analysis findings, identifying several standards as weakly connected to student achievement, including:

- Physical education instructional minutes
- Menstrual dignity requirements
- Redundant financial literacy provisions
- Educational equity advisory committees (our cross-state review found no comparable rule in the five comparison states)
- Rights of parents of Talented and Gifted students (our cross-state review found no comparable rule in the five comparison states)
- Asbestos management plans and agreements with voluntary organizations

The five-state comparative analysis also supports these findings. Standards with the least alignment to other states' systems, particularly those within the Engaged Partners and Communities domain, were also the ones most frequently described by stakeholders as peripheral to student outcomes.

A recurring theme across interviews and focus groups was that Division 22 has grown too large to be useful. The accumulation of requirements, including many that are ambiguous or difficult to measure, has contributed to check-the-box compliance rather than meaningful implementation. When surveyed, rule owners said that only 24 percent of standards require no changes, while more than a quarter need deeper structural or policy-level revision. Standards that cannot be meaningfully verified through a monitoring process and lack a clear connection to student experience were consistently viewed as candidates for removal or conversion to nonmandatory guidance.

Stakeholders Identified Opportunities to Improve Accountability

The analysis found that the current Division 22 monitoring and enforcement process is driven by compliance, reactive (triggered only by complaints), and relies almost entirely on unverified district self-reporting. Across stakeholder interviews, focus groups, and the rule owner survey, participants said the model produces inconsistent implementation and inequitable student experiences, particularly in rural and frontier communities where oversight capacity is most limited (see Division 22 Standards Review Key Findings, Findings by Data Collection Method in the Technical Report for more details).

Rule owners identified a persistent and documented gap between what districts report through the assurances process and what they saw when they dug deeper into district reality and looked at examples and artifacts associated with Division 22 standards. Furthermore, rule owners noted that several standards have no identified point of accountability at ODE.

Across stakeholder engagement, a tiered accountability model was the most frequently cited alternative to the current approach, one that scaffolds supports and consequences based on the severity and pattern of noncompliance rather than treating all violations the same. Stakeholders also pointed to the importance of proactive monitoring grounded in observable indicators, rather



than continued reliance on self-reported assurances. Multiple stakeholder groups highlighted the need to shift from self-reporting to verifying compliance and quality with data.

Rule owners described ODE's current guidance as often outdated, incomplete, or actively impeding compliance. They characterized agency resources as "several years old, confusing, and not useful" and as missing definitions and implementation tools. More than half of rule owners (54%) indicated that districts want ODE to set clear expectations, keep guidance current, and provide responsive technical assistance, reflecting that they see ODE as a potential partner in compliance, not only an enforcer. Public transparency around compliance expectations and monitoring outcomes was also identified as an important accountability mechanism, giving families, legislators, and communities the ability to assess district performance directly.

Increase Awareness of Oregon's Accountability System While Positioning Complaints as One Component of the Larger System

Across interviews, focus groups, and other data sources, participants consistently emphasized the importance of maintaining clear, accessible pathways for families, students, and community members to raise concerns about standards implementation and compliance limited (see Division 22 Standards Review Key Findings, Findings by Data Collection Method in the Technical Report for more details). Stakeholders viewed complaint processes as an essential component of accountability, providing a mechanism to identify and address situations where standards are not implemented as intended. However, participants across groups cautioned against relying on complaints as the primary accountability strategy.

Many stakeholders described existing complaint systems as difficult to navigate, opaque, and reactive rather than preventative. Families may be unaware of the standards governing educational services, struggle to recognize noncompliance, or not know how to file complaints. Some families expressed frustration with inconsistent communication and insufficient follow-through during investigations, creating perceptions that complaints are not always resolved effectively.

Participants broadly agreed that complaint systems should be accessible, available in multiple languages, and clearly communicated so that families and community members can use them when needed. Many stakeholders supported a tiered approach in which concerns are first addressed and resolved at the local level whenever appropriate before being escalated to ODE. At the same time, participants noted that there should be clear exceptions for issues of student safety, discrimination, civil rights violations, or serious concerns that warrant immediate state-level review.

Rule owners and system leaders highlighted practical challenges that affect the effectiveness of complaint-based accountability, including limited staffing, investigation backlogs, and insufficient capacity for proactive monitoring. Participants also described broader concerns about accountability processes that rely heavily on district self-reporting and limited verification, which some felt reduced confidence in the state's ability to consistently identify and address implementation challenges.



Overall, the findings suggest that the complaint processes should be viewed as one element of the broader accountability system. The state currently uses multiple accountability mechanisms, including the complaint process, self-reporting assurance processes, and other district reporting requirements. However, stakeholder feedback indicates that many participants were either unaware of these complementary accountability mechanisms or perceived that, in practice, meaningful accountability occurred more reactively to complaints than proactively through a robust monitoring process. This disconnect suggests a need for clearer and more strategic communication with communities about existing accountability structures; how they function; and the role of families, educators, and community members in supporting accountability efforts. Consistent with stakeholder input and research on effective accountability systems, complaint pathways are likely to be most effective when they are transparent, timely, and integrated with complementary strategies such as monitoring, technical assistance, and continuous improvement. Such an approach would preserve accessible avenues for raising concerns while also creating more proactive mechanisms for ensuring implementation quality and compliance across the system.

Division 22 Recommendations for Improvement

The recommendations are organized around the four review requirements established in SB 141. While several recommendations contribute to multiple aspects of the legislative charge, they are presented according to their primary purpose: identifying priority standards that connect directly to student outcomes; identifying standards to revise, consolidate, or remove; strengthening methods for monitoring and enforcing compliance; and establishing effective processes for reporting and resolving noncompliance. Together, the recommendations are intended to support a more coherent, transparent, and outcomes-focused standards and accountability system (see ORS 327.103 [Division 22] Recommendations in the technical report for more information about these recommendations).

Recommendation 1. Restructure Division 22 to Retain Only Standards That Connect Directly to Student Outcomes

Based on findings and best practice, this review points toward restructuring Division 22 to focus on a smaller set of standards that connect directly to student outcomes and can be measured in an explicit binary way. To identify the standards that remain in Division 22, ODE should develop and implement a set of standards review criteria such as what is described earlier in the foundational finding and recommendation (see Appendix E in the technical report for a table that summarizes the findings from the analysis that can be used as a starting place for assessing how standards meet defined criteria). Those identified to remain should be non-negotiable minimum expectations that are clear, consistently measurable, and enforceable statewide. Compliance should be straightforward—a school either meets the requirement or does not—and there should be a compelling state interest in ensuring uniform implementation regardless of geography or local context. Standards that fall into the following categories should be prioritized for inclusion:

- **Instructional time and school calendar:** every student is entitled to minimum instructional hours, and compliance is straightforward to measure and report



- **Credit requirements and graduation standards:** ensures a diploma represents a comparable educational experience regardless of district
- **Educator licensure and assignment requirements:** a binary standard; an educator is licensed or is not
- **Health, safety, and facility standards:** including physical plant safety, athletic and extracurricular safety, substance abuse education, and suicide prevention, which directly affect student well-being
- **Student records and privacy requirements:** legal minimums under the Family Educational Rights and Privacy Act; either in compliance or not
- **Special education procedural minimums:** basic compliance aligned with the federal framework
- **English language learner program requirements:** reflects federal obligations and state commitments to equitable access

We recommend that the state identify Division 22 standards for inclusion within six months of creating the formal standards review and governance process. This process should also be applied to administrative rules currently situated outside of Division 22 that impose mandates on districts to determine whether they should be incorporated into a set of restructured standards.

Standards that are both high impact and easily measurable (i.e., verifiable through clear, observable, or binary indicators) should be the core of the Division 22 standards. Mastery-focused and evidence-based standards, particularly in early literacy and core academic areas, should be strengthened in alignment with ODE's central mission to foster equity and excellence for every learner through collaboration with educators, partners, and communities.²

Additionally, each retained standard would benefit from explanatory guidance describing its connection to student outcomes, how compliance is monitored, and implementation and continuous improvement supports available to districts. Available supports for Division 22 standards should align with existing ODE initiatives already underway, such as the continuum of supports and regional support teams.

Recommendation 2. Relocate Standards With Less Direct Ties to Student Outcomes

Twenty-nine Division 22 standards were either moderately or indirectly tied to student outcomes. Based on these findings and best practice, Oregon should consider moving these standards into a separate regulatory accountability and continuous improvement framework. **This does not imply that these 29 standards are unimportant.** Many of the standards reflect essential components of a quality education; however, they do not connect directly to student outcomes, exist on a spectrum of quality, and may require professional judgment to evaluate. Their presence in Division 22 contributes to a rules structure that is simultaneously too rigid in some areas and too vague in others, while only loosely connecting to Oregon's priority outcomes.

² [Oregon Department of Education mission statement](#)



Educators, administrators, and community partners consistently described spending significant time on compliance documentation that yielded little insight into student learning, school improvement, or resource deployment. Stakeholders also highlight that by having all 59 standards in one place, they are positioned equally in terms of monitoring and accountability, regardless of their impact on student outcomes. That means, for example, that from a district’s perspective, asbestos management is viewed the same as instructional time. Moving the identified standards into a regulatory accountability framework—one organized around outcomes, supported by shared rubrics, and designed for continuous improvement rather than documenting the absence of violations—has the potential to reduce compliance burden, increase local flexibility, and produce far more useful information for schools, districts, boards, and the state.

Recommendation 3. Develop a Regulatory School Quality Framework and Annual School Quality Report

Based on findings and best practice in state accountability design, there is a strong case to develop a regulatory school quality framework organized around Oregon’s five student success priorities:

- | | |
|---|-------------------------------------|
| 1. High-quality learning experiences for all students | 3. Engaged partners and communities |
| 2. Aligned and focused educational systems | 4. Safe and inclusive schools |
| | 5. Committed and supported staff |

A regulatory school quality framework is a tool that organizes key components of education quality into a common statewide framework that supports continuous improvement, evidence-based monitoring, and transparent reporting while preserving local flexibility in implementation. Each student success priority area would be supported by measurable indicators drawn from data districts already collect under SB 141 and existing reporting requirements. This would avoid creating burdens while organizing existing data into a coherent, board-facing accountability structure.

Retained Division 22 standards with clear binary indicators can continue to be reported through an assurance-based process, like the one currently in place, with the addition of evidence of practice. Additionally, **we recommend that ODE develop a regulatory school quality framework with an accompanying statewide rubric for districts to assess and report their performance annually to local boards.**

The rubric would structure board conversations around the domains that matter most, capture the core concepts of any Division 22 standards that are relocated, create a common language for quality across districts, and generate a consistent record ODE can use for monitoring and support (see the technical report for an example rubric). Stakeholders explicitly called for a more transparent and aligned framework and rubric of this kind, noting that districts frequently do not know what standard of evidence ODE expects. A rubric that articulates what proficient and exemplary practice looks like in concrete, observable terms transforms accountability from a surveillance function into a learning function. It would also create a more meaningful role for local school boards by grounding public conversations in evidence of implementation, district strengths, areas for improvement, and identified support needs.



In developing and implementing this framework, it will be important to leverage existing SB 141 reporting structures and data whenever possible to minimize new reporting requirements and reduce administrative burden. The framework can be designed to align with existing district reporting and initiatives, including the Unified Application, and be supported by common statewide rubrics, evidence criteria, and guidance to promote consistency in implementation. Additionally, piloting the framework prior to statewide rollout would help build district and school board capacity, refine processes based on feedback, and support more effective and equitable implementation.

The annual school quality report would also provide ODE with a more consistent source of evidence to inform monitoring, technical assistance, and differentiated support. Rather than relying primarily on district assurances or complaint-driven oversight, ODE could use these reports to identify implementation strengths, effective practices, prioritize technical assistance, and focus accountability where additional support is needed. If this approach is pursued, the State Board could consider revising OAR 581-022-2305 to reflect the requirement to complete the school quality rubric and incorporate findings into the established community and school board report.

Recommendation 4. Reorient the Oregon Department of Education's Role Toward Differentiated Support and Improvement

The review found that districts across Oregon feel that the current system is driven by compliance, reactive, and punitive: Identifying problems to ODE triggers consequences rather than support, which incentivizes self-protection over transparency. This dynamic is worth addressing directly, by ODE leadership, **through an enhanced system of differentiated support and continuous improvement that leverages and aligns with other ongoing accountability efforts at the agency.** When a district submits a rubric showing beginning-level performance, a well-designed system would first respond by offering resources, identifying peer districts that have navigated similar challenges, and collaborating on an improvement plan. This does not mean abandoning enforcement. Standards retained in Division 22 (e.g., health and safety, instructional time, graduation requirements) would still be enforced consistently and with real consequences. However, it is important to distinguish between non-negotiable compliance failures and the continuum of school quality captured by the rubric. ODE's organizational culture, staffing, and performance metrics would benefit from reflecting this dual role—a direction already underway through SB 141 mandates establishing a Continuum of Supports and regional support teams.

Where rubric scores and student outcome data together show persistent, unresolved gaps, particularly among historically underserved focal student groups, escalation would remain available and necessary. That escalation would be graduated and transparent: beginning with more intensive structured support, moving through required improvement planning with defined milestones, and, where warranted after sustained nonperformance, to formal intervention. Thresholds for escalation would be clearly defined, publicly known, and consistently applied.

Recommendation 5. Increase Public Awareness of the Complaint Process

The analysis found that accessible complaint pathways are not clear to the public. Furthermore, families that engage in the current process report frustration with follow-through investigations



and supports. Although there is a system for families to submit complaints, and it is linguistically accessible, there is a need to build community awareness of these systems and clearly communicate expectations for response times and investigation resolutions.

We recommend keeping the reporting and resolution process at the local level while ensuring that ODE is aware of all concerns and follows the process toward a resolution.

Our recommended process would include:

- Notifications of concern submitted simultaneously to the local school board and to ODE so that both local governance and the state are immediately aware of the concern
- An option, where appropriate, for families to attempt resolution with the district before escalating to the state, consistent with legislative provisions allowing first-attempt resolution at the district level
- Materials, forms, and communications that are well publicized, easy to access, available in the languages spoken by Oregon families, and accompanied by plain-language summaries that support varying literacy levels and accessibility needs
- Transparent response timelines, including acknowledgment within five business days of submission of a concern, status updates at minimum every 30 calendar days until resolved, and a written summary of outcomes within five business days of resolution
- Retaliation protections that explicitly assure families that raising concerns will not result in adverse consequences for their students
- Statewide analysis of aggregated complaint trends to identify systemic patterns and inform ODE's technical assistance priorities, transforming family feedback from an isolated grievance mechanism into a system-level improvement signal

Establishing this system is not supplementary to the reform; it is a necessary accountability mechanism that ensures the flexibility granted to schools does not come at the expense of families' ability to hold schools accountable for delivering quality.



ORS 334.217 (Division 24) Standards Review

Division 24 standards establish requirements for education service districts (ESDs) to support districts across the state.

Findings

The following findings specific to Division 24 are drawn from interviews and focus groups.

Many Division 24 Standards Are Outdated or Obsolete

Stakeholders consistently described Division 24 standards as outdated and no longer reflective of how ESDs operate today. Governance structures, reporting requirements, and accountability functions embedded in the current rules have not kept pace with how the ESD system has evolved over the past two decades. Several participants pointed to specific examples of this drift—provisions tied to the original 1990s ESD reorganization, board zone and merger requirements, and audit retention rules—as evidence that portions of the standards are obsolete rather than merely outdated in tone.

The local service plan (LSP) process was the most frequently cited pain point. The LSP outlines services available to component districts related to children with special needs, technology support, school improvement, and administrative support. It is developed in concert with member districts and approved by both member district boards, and the ESD board. Stakeholders described it as burdensome, rigid, and largely disconnected from meaningful district or student outcomes. Rather than functioning as a living planning tool that helps ESDs and districts align around shared goals, the LSP was characterized as a static compliance artifact.

There was no clear consensus among stakeholders about which aspects of Division 24 are valuable and should be preserved. Stakeholders were far more likely to say Division 24 needs substantial overhaul than to name specific rules worth retaining. The one notable exception was a single participant's observation that the flexibility built into the LSP process has value and should not be eliminated, even as the process itself is redesigned.

Stakeholders Recommended Overall Changes to the Design, Structure, and Content of Division 24 Standards

Stakeholders offered several concrete recommendations for reshaping Division 24:

- Establish a clear theory of change that explicitly links ESD activities and services to student outcomes, so that the connection between what ESDs do and what students experience is traceable rather than assumed.
- Update the LSP and position it as the central planning document for ESDs, with flexibility to make adjustments midcycle rather than waiting for a full planning cycle to reset priorities.



- Remove provisions that position ESDs as district compliance officers. Stakeholders felt this framing is fundamentally at odds with the collaborative, service-oriented relationship ESDs are meant to have with component districts. They recommended replacing this language with standards that reflect ESDs' actual role as regional support partners.

The Oregon Department of Education Can Strengthen Trust, Collaboration, and Accountability Structures With Education Service Districts

On the question of how implementation and enforcement responsibilities should be distributed, stakeholders consistently emphasized the importance of clearly defining the respective roles of ODE and ESDs. Specifically, participants noted:

- The importance of building ODE's internal capacity and strengthening trust with ESDs before introducing new expectations. Several participants reflected that previous rule changes were implemented without sufficient lead time or meaningful dialogue, which diminished confidence in the rulemaking process.
- Accountability structures should tie ESD activities to measurable district and student outcomes, rather than relying on process compliance alone. This echoes the "outcomes over checkboxes" theme from the Division 22 review findings.

Supporting Analysis: Oregon Association of Education Service Districts Rule-by-Rule Review

The findings in this review are corroborated by a rule-level analysis conducted in 2023 by Gary Peterson, past director of the Oregon Association of Education Service Districts.³ Peterson's analysis is incorporated here because NWCC found that Division 24 rules are far removed from student outcomes and largely binary in measurement (i.e., a district or ESD either technically complies with a procedural requirement or it does not, with little regard for whether compliance produces any meaningful benefit), so applying the review procedure utilized for Division 22 was not applicable.

Peterson's review examined 29 Division 24 rules and assigned each a recommendation of Keep, Change, or Remove (five rules received no formal analysis or recommendation). Nearly 70 percent of reviewed rules (20 of 29) were flagged for removal or substantive change, a striking convergence with the finding that Division 24 no longer reflects how ESDs function. Illustrative examples from the analysis include:

- **Remove 581-024-0190 (Legal Name, Common Name and Annexation):** Peterson noted that this rule enabled language tied to the 1993 ESD Reorganization Act (Senate Bill 262) and became obsolete once the reorganization process concluded in 1996, an example of a rule that outlived its statutory purpose.

³ Peterson, G. (2023). *An analysis of Division 24: Standards for education service districts* [Unpublished manuscript]. Oregon Association of Education Service Districts.



- **Remove 581-024-0206 (Powers and Duties):** Provisions such as a requirement to retain completed audits for 20 years and language designating ESDs as school district boundary boards (a function eliminated by House Bill 3298 in 2011 and subsequently removed from statute by House Bill 2148 in 2013) no longer correspond to current law or practice.
- **Remove 581-024-0208 (Mission, Roles and Goals):** Annual reporting requirements referenced in this rule were superseded by Senate Bill 250 (2011), which established a different statutory reporting framework, making the existing rule redundant.
- **Change 581-024-0285 (Local Service Plans):** Peterson observed that the LSP standard language largely parallels existing statute (ORS 334.175) and recommended converting it into a checklist format with rubric descriptions (standard, conditionally standard, nonstandard)—a structural fix that would be more usable and measurable than its current narrative form. This recommendation aligns with the stakeholder critique that the LSP process is process-heavy but substantively thin.
- **Change 581-024-0192 (Establishment of Zones for New ESD):** While written for new ESDs, this rule’s population-based board zone requirements (tied to ORS 334.032) remain relevant to all current ESDs following each decennial census, suggesting the rule needs updating rather than removal.
- **Keep 581-024-0191 (ESD Merger, General Requirements):** Cited as one of the few provisions that remains actively useful, having been invoked in real mergers (Yamhill/Willamette in 2003, Union-Baker/Intermountain in 2011).

Peterson’s analysis provides a granular, rule-by-rule evidentiary basis for this review’s key finding: Division 24 has many obsolete or statutorily superseded provisions; its flagship planning instrument (the LSP) is ill suited to produce meaningful, measurable accountability; and Division 24 would benefit from a full-scale revision rather than piecemeal amendment.

Division 24 Recommendations for Improvement

Based on the findings, NWCC recommends modernizing Division 24 to clarify the role and impact of ESDs.

Recommendation 6. Remove Obsolete Provisions from Division 24

As a component of the review recommended for Division 22, Division 24 should be revised to remove obsolete provisions, including the boundary board function, the review of school district operations section, reporting requirements replaced by Senate Bill 250 that were never updated in rule, and an accountability framework that cannot meaningfully distinguish between standard and nonstandard ESD performance. Division 24 should retain only binary essential compliance minimums as enforceable standards, including governance and legal compliance, superintendent licensure, financial transparency and audit compliance, LSP adoption thresholds, special education service obligations, facility safety and emergency preparedness, annual reporting requirements under Senate Bill 250, and attendance supervision.



Recommendation 7. Establish Local Service Plans as the Accountability Instrument for Education Service Districts

The LSP should be the central accountability instrument connecting ESD service delivery to measurable district and student outcomes. This is already supported by the fact that OAR 581-024-0285 and ORS 334.175 require completion of the LSP for each ESD. LSPs must be affirmed by two-thirds of the school boards within an ESD's service area, representing at least half of the total number of students enrolled in component districts, and must contain annual performance measures.

To facilitate this shift, NWCC recommends that each LSP defines services to be delivered, intended educator capacity impacts, performance measures and data sources, and a financial plan demonstrating resource alignment, functioning as a two-year performance agreement between the ESD and the districts it serves. LSPs should explicitly connect to district accountability and improvement goals, including state and federal improvement designations.

Recommendation 8. Require Component Districts to Evaluate Education Service District Performance

The most legitimate accountability relationship for ESDs is with the districts they serve. Division 24 should require that the LSP process include documented evidence of district satisfaction and service effectiveness; not simply a vote, but a structured evaluation in which districts assess whether each service area met the needs for which it was approved. Measures of service quality should include responsiveness to district-identified needs, timeliness and accessibility of services, and evidence of district capacity-building, not merely counts of services delivered. Where districts consistently report unmet needs, the ESD should document its response in the subsequent LSP planning cycle.

Recommendation 9. Establish a Biennial Local Service Plan Approval Cycle With Opportunity for Midcycle Adjustments

The current annual LSP approval cycle should move to a biennial structure that aligns to the state budget cycle. The cycle should include a midpoint review for service adjustments that do not require full board reapproval, unless material changes are involved. This shift requires targeted statutory changes to ORS 334.175. Division 24 should require that structured district evaluations of ESD performance, described above, be integrated into each LSP cycle.

After each two-year cycle, ESDs should submit a biennial performance report to ODE organized around established accountability domains including service delivery and student impact, district partnership and responsiveness, financial stewardship, continuous improvement, regional coordination, and governance and operational integrity.



Recommendation 10. Codify the Roles of the Oregon Department of Education and Education Service Districts

Division 24 should codify ODE's obligation to consult with and engage ESDs in planning and implementing statewide initiatives and clearly define how ESD regional support functions and ODE regional support teams align to avoid duplication and gaps.



Conclusion. A Coherent Framework for Oregon's Education System

The recommendations presented in this report are not independent reforms; they drive toward a more coherent system. Together, they establish a clear, consistent logic across every level of Oregon's education infrastructure: distinguish between what is non-negotiable and what exists on a continuum of quality; enforce the former with consistency and support the latter with investment; and build accountability relationships that are grounded in trust, transparency, and shared commitment to student outcomes.

That logic depends on clarity about the obligations involved. Statutes establish legal authority and structural mandates that no district, ESD, or agency may circumvent. Administrative rules codify the binary, measurable, enforceable minimums that represent the state's non-negotiable floors. Standards define statewide expectations for quality, what excellent practice looks like, and what Oregon aspires to achieve across its schools and regions. And mandates give those obligations force, ensuring that required actions are implemented, not merely encouraged.

Distinguishing these categories is not a technical nicety; it is the prerequisite for a system in which every actor understands their role, exercises it with integrity, and is held accountable for results. This includes the Legislature providing statutory authority and funding, ODE designing and monitoring the standards system, the Oregon State Board of Education adopting and revising administrative rules, the Governor's Office aligning cross-agency priorities, ESDs translating state expectations into differentiated regional support, districts implementing with fidelity and community voice, and families advocating for students.

At the same time, this report should be viewed as a beginning, not an endpoint. The findings and recommendations contained here do not, by themselves, improve student outcomes. Real improvement will depend on the decisions and actions that follow. Once this report is finalized, education leaders and governing bodies will need to determine what to prioritize and which recommendations can be advanced given existing authority, capacity, and resources, all while building toward long-term systemic change. Effective governance requires not only a clear vision of what to improve, but also disciplined decision-making about sequencing, resourcing, and implementation.

Throughout the review, participants emphasized that Oregon's students do not need a more complicated system; they need a more coherent one. These recommendations aim to guide Oregon toward a more coherent system that ensures all students have access to the opportunities and conditions necessary for success.



Appendix A. Division 22 and 24 Standards

Division 22

The following outline Division 22 rule numbers and titles that align with each of Oregon's five priorities for student success.

Aligned and Focused Educational Systems

- [581-022-2320](#) — Required Instructional Time
- [581-022-2025](#) — Credit Options
- [581-022-2030](#) — District Curriculum
- [581-022-2060](#) — Comprehensive School Counseling
- [581-022-2120](#) — Essential Skill Assessments for English Language Learners
- [581-022-2315](#) — Special Education for Children with Disabilities
- [581-022-2335](#) — Daily Class Size
- [581-022-2400](#) — Personnel
- [581-022-2445](#) — Universal Screenings for Risk Factors of Dyslexia
- [581-022-2100](#) — Administration of State Assessments
- [581-022-2110](#) — Exception of Students with Disabilities from State Assessments
- [581-022-2115](#) — Assessment of Essential Skills
- [581-022-2130](#) — Community Informed Information Gathering Process at Kindergarten
- [581-022-2250](#) — District Improvement Plan
- [581-022-2260](#) — Records and Reports
- [581-022-2265](#) — Report on PE Data
- [581-022-2300](#) — Standardization
- [581-022-2305](#) — District Assurances of Compliance with Public School Standards
- [581-022-2325](#) — Identification of Academically Talented and Intellectually Gifted Students

Safe and Inclusive Schools

- [581-022-2215](#) — Safety of School Sports–Concussions
- [581-022-2220](#) — Health Services
- [581-022-2267](#) — Annual Report on Restraint and Seclusion
- [581-022-2510](#) — Suicide Prevention Plan
- [581-022-2045](#) — Substance Use Prevention and Intervention Plan
- [581-022-2225](#) — Emergency Plans and Safety Programs



- [581-022-2310](#) — Equal Education Opportunities
- [581-022-2345](#) — Auxiliary Services
- [581-022-2430](#) — Fingerprinting of Subject Individuals in Positions Not Requiring Licensure as Teachers, Administrators, Personnel Specialists, School Nurses
- [581-022-2205](#) — Policies on Reporting of Child Abuse
- [581-022-2223](#) — Healthy and Safe Schools Plan
- [581-022-2312](#) — Every Student Belongs
- [581-022-2515](#) — Menstrual Dignity for Students
- [581-022-2210](#) — Anabolic Steroids and Performance Enhancing Substances
- [581-022-2230](#) — Asbestos Management Plans
- [581-022-2308](#) — Agreements Entered Into with Voluntary Organizations

High-Quality Learning Experiences for All Students

- [581-022-2000](#) — Diploma Requirements
- [581-022-2010](#) — Modified Diploma
- [581-022-2050](#) — Human Sexuality Education
- [581-022-2055](#) — Career Education
- [581-022-2263](#) — Physical Education Requirements
- [581-022-2340](#) — Media Programs
- [581-022-2355](#) — Instructional Materials Adoption
- [581-022-2440](#) — Teacher Training Related to Dyslexia
- [581-022-2020](#) — Certificate of Attendance
- [581-022-2350](#) — Independent Adoptions of Instructional Materials
- [581-022-2505](#) — Alternative Education Programs
- [581-022-2015](#) — Extended Diploma
- [581-022-2500](#) — Programs and Services for TAG Students
- [581-022-2360](#) — Postponement of Purchase of State-Adopted Instructional Materials

Engaged Partners and Communities

- [581-022-2005](#) — Veterans Diploma
- [581-022-2270](#) — Individual Student Assessment, Recordkeeping and Reporting
- [581-022-2255](#) — School and District Performance Report Criteria
- [581-022-2307](#) — Educational Equity Advisory Committees
- [581-022-2330](#) — Rights of Parents of TAG Students
- [581-022-2370](#) — Complaint Procedures



Committed and Supportive Staff

- [581-022-2410](#) — Teacher and Administrator Evaluation and Support
- [581-022-2415](#) — Core Teaching Standards
- [581-022-2420](#) — Educational Leadership - Administrator Standards
- [581-022-2405](#) — Personnel Policies

Division 24

The following rule numbers and titles are included for Division 24.

- 581-024-0190 — Legal Name, Common Name and Annexation
- 581-024-0191 — ESD Merger, General Requirements
- 581-024-0192 — Establishment of Zones for New ESD
- 581-024-0193 — Election of Board of New ESD
- 581-024-0205 — Definitions
- 581-024-0206 — Powers and Duties
- 581-024-0208 — Mission, Roles and Goals
- 581-024-0210 — Administration of the Standardization Requirements
- 581-024-0215 — Assignment of Standardization Classification
- 581-024-0226 — Assessment and Evaluation of Services
- 581-024-0228 — Review School District Operations
- 581-024-0231 — Curriculum Improvement
- 581-024-0235 — Special Education Services
- 581-024-0240 — Administration
- 581-024-0245 — Staff
- 581-024-0250 — District Boundary Board
- 581-024-0252 — Boundary Changes
- 581-024-0255 — Attendance Supervision
- 581-024-0257 — Children Instructed by Parent or Private Teacher
- 581-024-0260 — Budgets
- 581-024-0262 — Budget Committee
- 581-024-0265 — Audits
- 581-024-0270 — State Board Assistance
- 581-024-0275 — Facilities, Safety and Emergency Planning
- 581-024-0280 — Auxiliary Services



- 581-024-0285 — Local Service Plans
- 581-024-0290 — Advisors to the Board
- 581-024-0300 — Advisory Committees
- 581-024-0310 — Gifts and Bequest



Appendix B. Glossary

Accountability: The process of ensuring that Oregon school districts, public charter schools, and education agencies meet state and federal education requirements and are responsible for student outcomes, fiscal stewardship, and compliance with applicable laws and standards.

Assurance: A formal, legally binding certification provided by a school district or education agency confirming that it will comply with applicable Oregon laws, administrative rules, and federal education requirements as a condition of receiving funding or approval.

Compliance: The extent to which a school district, education service district, or public school meets the requirements established in Oregon statutes, administrative rules, and federal education laws.

Continuous improvement: An ongoing process of using data to improve educational outcomes and organizational performance.

Continuum of Supports: An accountability and improvement system designed to help Oregon school districts meet student success priorities. It replaces punitive monitoring with an equity-centered, tiered approach, providing preventative coaching, professional development, and technical assistance to underperforming districts.

Differentiated monitoring: A modern accountability approach where oversight is tailored based on a district's level of risk, performance, or history of compliance rather than applying the same level of monitoring to everyone.

Division 22 standards: Oregon Administrative Rules (OAR Chapter 581, Division 22) that establish minimum standards for public elementary and secondary schools. These standards contain requirements relating to the five priorities for student success: high-quality learning experiences for all students, aligned and focused educational systems, engaged partners and communities, safe and inclusive schools, and committed and supported staff.

Division 24 standards: Oregon Administrative Rules (OAR Chapter 581, Division 24) establish the standards for education service districts. These rules govern how education service districts operate, including requirements for comprehensive core service plans and local service plans.

Education service district (ESD): Regional public education agencies established by Oregon law that partner with the Oregon Department of Education. There are 19 education service districts statewide. They provide specialized programs to local school districts within their service regions that are often too costly for individual districts to manage alone, such as technical assistance, professional learning, special education support, technology, and other educational services.

Enforcement: Actions taken by the Oregon Department of Education to address violations of state laws or administrative rules, including requiring corrective actions, monitoring progress, or applying statutory consequences when necessary.



Every Student Succeeds Act (ESSA): The federal law governing K–12 education that establishes requirements for accountability, assessment, school improvement, educator quality, and support for historically underserved student populations. ESSA was signed into law in 2015, replacing the previous education law No Child Left Behind.

Evidence review: The examination of documentation, records, policies, procedures, and other materials to verify compliance with legal and administrative requirements.

Family Educational Rights and Privacy Act (FERPA): The federal law that protects the privacy of student education records and governs how Oregon schools collect, maintain, and disclose student information.

Graduated intervention: A series of increasingly intensive supports or corrective actions that escalate based on the severity or persistence of implementation challenges or noncompliance.

Guidance: Nonregulatory information, recommendations, or resources issued by the Oregon Department of Education to help districts understand and implement statutory or administrative requirements. Guidance explains expectations but generally does not create new legal requirements.

Implementation: The process of putting laws, policies, standards, or administrative rules into practice. This is a common policy term that is often assumed but not defined.

Local service plan (LSP): A collaborative plan developed by an education service district in partnership with its component school districts that identifies the educational services the education service district will provide, how those services align with district needs, and how state resources will be allocated to support them.

Menstrual Dignity Act: Oregon’s Menstrual Dignity Act (HB 3294) mandates that all public school districts, charter schools, and education service districts provide free, easily accessible menstrual products in all student bathrooms. The law covers all K–12 grades and ensures products are inclusive and affirming for all students.

Monitoring: The Oregon Department of Education’s process of reviewing district policies, documentation, practices, and performance to determine compliance with state and federal education requirements and identify areas needing improvement. The Oregon Department of Education conducts multiple structured monitoring processes across school districts to ensure compliance and student growth. This includes Elementary and Secondary Education Act federal grant monitoring, fiscal monitoring, and special education/general supervision oversight.

Noncompliance: A determination that a school district, education service district, or school has not met one or more requirements established in Oregon law, administrative rules, or federal education regulations, often requiring corrective action.

ODE rule owner: An Oregon Department of Education staff member designated as the subject matter expert and primary administrator for one or more Oregon Administrative Rules. Rule owners oversee rule implementation, provide guidance and technical assistance, support



monitoring and compliance activities, coordinate rulemaking and stakeholder engagement, and serve as the primary point of contact for questions related to their assigned rules.

Oregon Administrative Rules (OAR): The administrative rules that implement Oregon statutes including Divisions 22 and 24.

Oregon Department of Education (ODE): The state agency responsible for administering Oregon's public education system.

Oregon State Board of Education: The governing body that adopts Oregon's education administrative rules and statewide education policies.

Outcomes-focused: An approach that emphasizes measurable improvements in student learning, educational access, well-being, and school performance rather than simply demonstrating procedural compliance.

Risk-based monitoring: An approach that prioritizes monitoring activities based on indicators of risk, such as prior findings of noncompliance, student outcomes, fiscal concerns, or other factors suggesting that additional oversight or support may be needed.

School improvement: Evidence-based efforts to improve student achievement, educational equity, and school performance.

Self-certification: A key concept in Oregon's current Division 22 accountability system. Districts annually certify that they meet Division 22 requirements.

Special education service obligations: The legal responsibilities of Oregon school districts to identify, evaluate, and provide appropriate special education and related services to eligible students with disabilities in accordance with state law and the federal Individuals with Disabilities Education Act.

Standards: The minimum requirements established in Oregon statutes and administrative rules that govern the operation of public schools, educational programs, and district responsibilities.

Talented and Gifted (TAG): Oregon's program for identifying and serving students who demonstrate exceptional academic or intellectual ability and require differentiated educational opportunities to meet their learning needs.

Technical assistance: Training, coaching, consultation, tools, and other supports provided by the Oregon Department of Education, education service districts, or other partners to help school districts build capacity, improve implementation, and achieve compliance with state and federal requirements.

Unified Application: An initiative launched by the Oregon Department of Education to significantly streamline and simplify the state and federal grant application and reporting processes for school districts.

Validation: The process of confirming that reported information, certifications, or evidence accurately reflects actual implementation and compliance.

