



TECHNICAL 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 of the full report for a 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Many Division 24 standards are outdated or obsolete.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, school 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 (the 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 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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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; Committed and Supported Staff.

Division 24 standards: Oregon Administrative Rules (OAR Chapter 581, Division 24) establishes 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 Oregon Department of Education. There are 19 education service districts statewide, providing specialized programs that are often too costly for individual school districts to manage alone such as technical assistance, professional learning, special education support, technology, and other educational services to local school districts within their service regions.

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 ESEA 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.

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

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 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.



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.

These standards play out in the context of Oregon's diverse education system. The state's 197 school districts and 19 ESDs serve communities that differ significantly in geography, student demographics, local priorities, and available resources. Maintaining both statewide consistency and local flexibility has therefore been a long-standing challenge.

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 positive student outcomes. 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 provides detail on the methodology, findings across data sources, implementation considerations, and supporting resources. For a synthesized version that summarizes the key findings and recommendations, please see the companion Legislative 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 framework 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 to 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

NWCC used multiple sources of evidence to examine both the content of existing standards and how they function in practice. Rather than relying on a single data source, the team developed findings through triangulation across standards analysis, stakeholder engagement, survey data, and comparative state analysis. The core group of leaders from ODE provided guidance on several states to include in the comparative analysis, which was not explicitly stated as a requirement in SB 141 but provided important context to understand other levers that contribute to improvements besides statewide standards. Finally, we used research findings to contextualize stakeholder feedback, validate emerging themes, and identify evidence-based practices that may strengthen Oregon's standards and accountability systems.

This approach, in its entirety, incorporated the perspectives of policymakers, practitioners, families, and community members while also examining how Oregon's standards compare to other states and to current research on accountability and school improvement.

Standards Analysis

NWCC conducted a review of all Division 22 standards to assess two key characteristics:

- The extent to which each standard supports student outcomes
- The extent to which each standard can be consistently measured and monitored

Three NWCC staff members reviewed each standard using a common rubric and did so independently to reduce bias. Standards were examined to determine whether they directly influence student learning, access to educational opportunities, student safety and well-being, or other factors associated with student success. Reviewers also assessed whether compliance could be clearly measured and verified.

Stakeholder Engagement

NWCC conducted extensive stakeholder engagement to understand how standards are experienced and implemented across Oregon's education system.

Data collection included:

- Twenty-six interviews
- Sixteen focus groups
- Written feedback submissions
- Interviews with seven state legislators regarding legislative intent



Participants represented a broad range of perspectives, including:

- ODE staff members
- ESD leaders
- School and district administrators
- Educators
- School board representatives
- Families and family advocacy organizations
- Students
- Community organizations
- State agency partners
- Professional associations

Stakeholder conversations explored the strengths and limitations of current standards, implementation challenges, accountability systems, enforcement processes, and opportunities for improvement.

Interview and focus group data were analyzed using qualitative coding methods to identify recurring themes and areas of agreement across stakeholder groups. A full list of engaged stakeholder groups and protocols can be found in Appendix B.

Survey of Rule Owners

NWCC administered a survey to ODE staff members who are responsible for overseeing Division 22 standards. The survey questions can be found in Appendix C. These “rule owners” provided information about implementation, monitoring, technical assistance, compliance challenges, and opportunities for revision.

Responses were collected for 50 of the 59 Division 22 standards. Survey findings provided important insight into how standards are currently supported, monitored, and enforced, as well as areas where ODE guidance, technical assistance, or accountability structures may require improvement. We analyzed the survey responses using descriptive statistics and thematic review of open-ended comments.

Comparative State Analysis

The ODE core group of leaders recommended that NWCC investigate administrative rules and accountability systems in other states to understand how they approach statewide standards, monitoring, and accountability. This analysis also allowed us to explore the systems conditions present in states with demonstrated improvement, understanding that standards alone do not drive improved student outcomes. Specifically, ODE recommended that NWCC look at states in the Pacific Northwest, states receiving nationwide publicity for recent student academic gains, and a sample of states identified as not demonstrating student academic gains.



To meet this request, NWCC conducted a comparative analysis that included two components:

- Comparison of administrative rules and statewide educational standards across selected states
- Review of accountability systems used in states that have demonstrated varying levels of improvement in academic outcomes and graduation rates

The purpose of this analysis was not to identify a single model for Oregon to replicate but rather to identify promising practices, common approaches, and lessons that may inform future revisions to Division 22 and Division 24 standards.



ORS 327.103 (Division 22) Standards Review and Key Findings

Findings are presented in two ways. First, we synthesized all data collection methods to provide findings according to each of the four legislative requirements in SB 141. This provides context and rationale for the proceeding recommendations. Second, we provide in-depth thematic findings for each method of data collection. These results are presented in a way that best aligns to the collected data.

Findings by Legislative Request

Legislative Request 1. Standards That Best Support Student Outcomes and Should Be Prioritized

Across all data sources there was strong agreement regarding the standards that most directly support student outcomes. These 30 student-facing standards reflect three general categories: academic infrastructure, targeted intervention for special populations, and student safety and well-being.

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, rule owners, and reviewers alike emphasized the importance of maintaining statewide expectations for academic achievement, educational access, student well-being, and student safety while preserving flexibility in how districts implement those expectations. Collectively, the findings suggest that Oregon should prioritize standards that establish a statewide educational floor and directly support student learning, educational access, and long-term success.

Key Findings

- Thirty Division 22 standards were identified as having a direct impact on student outcomes
- Student-facing standards received the strongest support across all data sources
- Academic opportunity, educational access, and student well-being emerged as the most common themes
- Stakeholders consistently prioritized literacy, instructional quality, graduation, and postsecondary readiness
- Rule owners identified strong alignment between these standards and Oregon's Performance Growth Targets
- Stakeholders repeatedly identified student safety, belonging, and mental health as prerequisites for learning
- State comparisons support prioritizing standards that directly affect student outcomes



Legislative Request 2. Standards That Make Less Significant Contributions to Student Outcomes and May Be Removed, Consolidated, or Relocated

Across all data sources, participants consistently distinguished between standards that directly influence student outcomes and standards that primarily govern administrative, procedural, reporting, or compliance functions. While stakeholders, rule owners, and reviewers generally agreed that many of the requirements less focused on student outcomes remain important, they frequently questioned whether all belong within Division 22 or should instead be addressed through guidance, reporting systems, accountability structures, or statute. Findings suggest that Oregon's standards framework has expanded over time through the addition of new requirements without a corresponding process for review or removal. As a result, several standards now serve primarily operational purposes and have only indirect connections to student outcomes. The evidence supports a systematic review of standards to determine which should remain, which should be revised, and which may be better addressed through other mechanisms.

Key Findings

- Eight standards were identified as having little or no direct impact on student outcomes
- Twenty-one standards were identified as having a moderate impact on student outcomes
- Lower-impact standards were primarily administrative, procedural, reporting, or compliance-oriented
- Stakeholders frequently described Division 22 as overly complex and difficult to navigate
- Participants questioned whether some requirements belong in standards rather than guidance or reporting systems
- Rule owners identified numerous standards requiring modernization, clarification, or structural revision
- Administrative requirements often support accountability but do not directly influence student learning

Legislative Request 3. Effective Methods for Determining Whether a District Is in Standard

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. Findings revealed substantial variation in both the measurability of standards and the methods used to monitor implementation. Some standards can be objectively verified through plans, reports, training records, or quantitative data, while others require professional judgment to assess implementation quality and effectiveness. Stakeholders and rule owners repeatedly emphasized that a single accountability approach is insufficient for standards that serve fundamentally different purposes. The evidence suggests that Oregon would benefit from a differentiated accountability system that distinguishes between minimum standards that can be monitored through compliance reviews and quality standards that are better assessed through evidence-based reviews that could support continuous improvement processes.



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.

Key Findings

- Twenty-nine standards were identified as easily measurable through objective evidence
- Thirty standards were identified as measurable but difficult to verify because implementation quality varies
- Stakeholders consistently described the current system as overly reliant on district assurances
- Rule owners reported fragmented monitoring responsibilities across standards
- Rule owners reported that monitoring, guidance, and technical assistance vary substantially across ODE programs
- Participants supported stronger technical assistance and implementation support alongside accountability
- Findings support a differentiated accountability system that distinguishes between minimum standards and a continuum of component quality

Legislative Request 4. A Process for Complaints Regarding Noncompliance With Standards

Across all 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. 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.

Key Findings

- Stakeholders consistently reported that complaint processes can be difficult to navigate and understand
- Participants emphasized that complaint systems should not serve as Oregon's primary accountability mechanism



- Families expressed a need for accessible, multilingual, and clearly communicated complaint pathways
- Stakeholders generally supported local resolution before state escalation when appropriate
- Stakeholders emphasized the need for exceptions related to student safety, discrimination, and civil rights concerns
- Rule owners identified staffing limitations, investigation backlogs, and limited monitoring capacity
- Research suggests complaint systems are most effective when integrated into broader accountability and continuous improvement systems

Findings by Data Collection Method

Analysis of Existing ORS 327.103 (Division 22 Standards) Rules

The NWCC study team analyzed the existing ORS 327.103 rules on two variables:

1. Impact on Student Outcomes

Reviewers rated the extent to which each standard influences student outcomes using a three-point scale:

- 1 = Does not impact student outcomes
- 2 = Moderate impact on student outcomes
- 3 = Direct impact on student outcomes

2. Measurability

Reviewers assessed whether each standard could be operationalized and monitored in practice using a three point scale:

- 1 = Cannot be measured
- 2 = Measurement may be ambiguous or difficult
- 3 = Easily measured

Results for the number of rules identified within each impact scale are shown below (table 1). Consensus decisions by reviewers for each individual rule are provided in Appendix D.

Impact on Student Outcomes

Table 1. Number of rules identified within each impact scale related to student outcomes

Outcome rating scale	Number identified by reviewers
Directly impacts outcomes	30
Moderately impacts outcomes	21
Does not impact student outcomes	8

Source: NWCC analysis of ORS 327.103.

Within the 30 rules identified as having a direct impact on students, the rules shared a common characteristic in that they are student-facing, rather than governing administrative or operational processes. These rules directly define what students earn, shape the conditions under which they



learn, or deliver services to them. For example, rules such as Diploma Requirements, Modified Diploma, Extended Diploma, and Credit Options directly determine the credential a student earns at the end of their K–12 experience. Similarly, rules governing District Curriculum, Instructional Materials, Required Instructional Time, and Daily Class Size shape what students are taught, by whom, and for how long, forming the core academic infrastructure of the student experience.

Also prominent among the rules we identified are those addressing equity, access, and student well-being. Standards such as Special Education for Children with Disabilities, Universal Screenings for Risk Factors of Dyslexia, Teacher Training Related to Dyslexia, and Essential Skill Assessments for English Language Learners reflect the importance of targeted intervention for students at greatest risk of not meeting expected outcomes. Likewise, rules covering Suicide Prevention, Substance Use Prevention and Intervention, Health Services, and Every Student Belongs recognize that student safety and well-being are prerequisites to learning. Across all the rules we identified, the common thread is that each one directly touches a student's ability to access education, feel safe, and ultimately succeed.

While the rules identified as having a direct impact on students tend to be student-facing, the rules the reviewers identified as having a moderate impact are more often characterized by their planning, procedural, or governance nature. Rather than directly touching the student experience, these rules create the frameworks, systems, and oversight structures that influence outcomes one step removed. For example, rules such as Healthy and Safe Schools Plan, Emergency Plans and Safety Programs, and Asbestos Management Plans establish important safety conditions for students but do so through planning documents and compliance requirements rather than direct service delivery. Similarly, School and District Performance Report Criteria and Administration of State Assessments measure and report on student outcomes without directly driving them.

Also common among the moderately impacting rules are those focused on equity, rights, and structural accountability. These rules are important in principle but more indirect in their effect on individual students. These include rules such as Educational Equity Advisory Committees, Equal Education Opportunities, and Educational Leadership. These administrator standards create governance structures and set expectations that can shape the broader environment for students, but they rely on implementation layers before reaching the classroom. Rules like Rights of Parents of TAG Students, Policies on Reporting Child Abuse, and Fingerprinting of Subject Individuals are protective and important, yet are procedural in nature and do not directly deliver instruction or support to students.

The rules our team identified as having no direct impact on student outcomes are uniformly administrative and compliance-oriented in nature. Rules such as District Assurances of Compliance with Public School Standards, Records and Reports, Personnel Policies, and Complaint Procedures govern the internal operations and documentation requirements of school districts rather than the student experience itself. Similarly, Report on PE Data, District Improvement Plan, and Standardization function as reporting and planning mechanisms that exist largely behind the scenes. While these rules are necessary for accountability and organizational function, they do not



deliver services to students, define what students learn or earn, or address barriers to student success, placing them at the furthest remove from direct student impact among the Division 22 standards reviewed.

Ease of Measurement

The results for the number of rules identified within each measurement scale are shown below (table 2).

Table 2. Number of rules identified within each measurement scale

Outcome rating scale	Number identified by reviewers
Easily measured	29
Measurement may be ambiguous or difficult	30
Cannot be measured	0

Source: NWCC analysis of ORS 327.103.

The rules our team identified as easily measured share a common characteristic: compliance can be determined through clear, observable, and often binary indicators. Many of these rules require the existence of a specific plan, report, program, or policy, such as the Suicide Prevention Plan, Substance Use Prevention and Intervention Plan, Annual Report on Restraint and Seclusion, and District Assurances of Compliance, making it straightforward to assess whether a district has met the requirement.

Others are measurable through quantitative data, such as Required Instructional Time, Physical Education Requirements, Universal Screenings for Risk Factors of Dyslexia, and Teacher Training Related to Dyslexia, where hours, counts, or completion rates provide a clear picture of compliance.

Diploma-related rules—including Diploma Requirements, Modified Diploma, Extended Diploma, Certificate of Attendance, and Veterans Diploma—are similarly concrete, as credential attainment is a well-documented and consistently tracked outcome. Across this group, the ease of measurement stems from the fact that these rules tend to produce tangible, documentable evidence of compliance rather than requiring qualitative judgment or long-term outcome tracking.

The rules our team identified as measurable but potentially ambiguous or difficult to assess share a common challenge: While it may be possible to verify that a requirement exists or has been initiated, measuring the quality, fidelity, or effectiveness of implementation is considerably harder. For many of these rules, such as Comprehensive School Counseling, Career Education, Health Services, and Media Programs, a district can demonstrate that a program is in place, but determining whether that program is adequately or equitably serving students requires deeper analysis and qualitative judgment. Others, such as Every Student Belongs, Equal Education Opportunities, and Educational Equity Advisory Committees, address goals that are inherently difficult to quantify.



Rules governing Teacher and Administrator Evaluation and Support, Core Teaching Standards, and Educational Leadership, present similar challenges, as evaluating the quality of professional practice involves subjectivity and contextual factors that vary across districts. Even rules that appear more procedural, such as Special Education for Children with Disabilities, Identification of Academically Talented and Gifted Students, and Administration of State Assessments, carry measurement complexity due to the variability in how districts interpret and implement requirements. Across this group, the difficulty lies not in whether compliance can be claimed, but in whether it can be meaningfully verified.

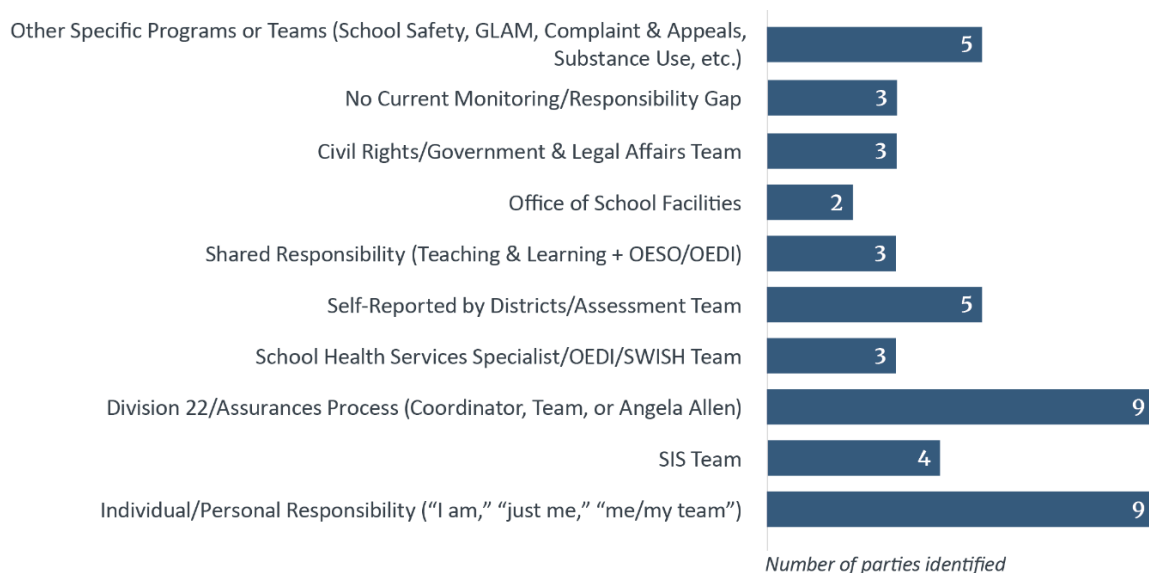
Rule Owner Survey

Monitoring of Division 22 Rules

Responses regarding responsibility for monitoring Division 22 rules revealed significant variation in how compliance oversight is structured, and in some cases, whether it exists at all (figure 1). At one end of the spectrum, some rules were identified by rule owners as having clearly designated individuals or teams actively monitoring compliance. In other cases, responsibility is shared across multiple offices or teams, such as the Teaching and Learning Department and the Office of Enhancing Student Opportunities.

A notable theme across many responses is reliance on district self-reporting through the Division 22 assurances process as the primary, and sometimes only, mechanism for monitoring compliance. Most concerning, several respondents noted that monitoring responsibilities previously held by the District and School Effectiveness Team have gone unassigned following office reorganizations and changes in federal requirements under ESSA, leaving some rules with no identified point of accountability. One respondent noted explicitly that their team was assigned a rule only as "the best fit," and that they conduct no substantive guidance or support work related to it.

Figure 1. Parties identified for monitoring Division 22 rules



Source: NWCC analysis of rule owner survey data.

ODE Guidance for ORS 327.103 (Division 22) Rules

Rule owners had a wide range of sentiments regarding the availability of ODE guidance for Division 22 rules (table 3). Some felt that guidance was unnecessary while others described critical gaps that were actively impeding district compliance. Similarly, several rule owners described their rules as straightforward and self-explanatory, indicating that existing guidance or the clarity of the rule language itself was sufficient, while others said their guidance was outdated, incomplete, or in need of significant revision. One owner described the current guidance as "several years old, confusing, and not useful," while another noted that tools and guidance were actively in development.

In several cases, rule owners identified specific, concrete gaps, such as the absence of a definition for "self-contained special education classroom" in the Extended Diploma rule, the lack of guidance documents for alternative schools and programs, and the absence of tools to help districts implement substance use prevention requirements beyond basic compliance.

A recurring theme was the distinction between guidance that supports technical compliance and guidance that supports effective implementation. Several owners noted that while districts may understand what is required, they lack the resources to do it well. Some responses also surfaced structural concerns, including a rule so broad that a single assurance checkbox is insufficient to capture compliance, and a rule where the bar for meeting the standard was described as "fundamentally unclear."

Table 3. Rule owner sentiment regarding presence of guidance for rules from ODE

Question	Response	Percentage of respondents
Is there guidance from ODE on effective implementation of this rule?	Yes	50.00%
	No	21.20%
	Somewhat	32.70%

Source: NWCC analysis of rule owner survey data.

Rule Monitoring Outside of ORS 327.103 (Division 22)

We asked rule owners to identify any rules that were monitored through mechanisms outside Division 22 (table 4). They identified several, including federal Asbestos Hazard Emergency Response Act (AHERA) regulations for asbestos management, state assessment manuals administered by the Assessment Team, civil rights complaints and appeals processes through the Office of Government and Legal Affairs, and statewide graduation rate reporting.

In other cases, external mechanisms exist but are more supportive than enforcement-oriented, such as the School Safety and Emergency Management program, which provides direct assistance to districts but does not function as a primary compliance monitor. Meanwhile, other rules are tracked through supplemental data systems, such as Smartsheet for TAG submissions or statewide data collections for restraint and seclusion, although these systems vary in their enforcement capacity.



Table 4. Rule owners' perception that some compliance is monitored through mechanisms outside of Division 22

Question	Response	Percentage of respondents
Is compliance enforced or monitored through mechanisms outside Division 22?	Yes	31.40%
	No	56.90%
	Somewhat	11.80%

Source: NWCC analysis of rule owner survey data.

Regarding supports ODE currently provides to help districts meet Division 22 rules, respondents revealed a wide range of available resources. Across the full set of responses, no uniform standard exists for what support looks like from rule to rule. We categorize them broadly as consistently resourced, inconsistently resourced, and poorly resourced.

In the first category, rules related to restraint and seclusion are backed by statewide data collection systems, a detailed technical assistance manual, quick reference one-pagers, sample forms, staff training requirements, and approved provider lists. Suicide prevention also receives robust support, with ODE providing guidance documents, implementation tools, template and exemplar plans, FAQs, supplemental lessons, webinars, and individual technical assistance, as well as grant-in-aid funding to ESDs to support regional school safety and prevention specialists. Meanwhile, rules related to dyslexia screening and teacher training benefit from annually updated approved screener lists, a clearly articulated five-step screening model, a dedicated dyslexia webpage, and training aligned to the Early Literacy Framework. Health services, emergency planning, and human sexuality education were similarly described as having dedicated specialists, office hours, regular communications, and one-on-one technical assistance available to districts.

A second category of rules reflects supports that exist but are inconsistent, limited in scope, or primarily reactive in nature. In these cases, rule owners may offer technical assistance when contacted by districts but do not proactively provide training, office hours, or monitoring tools. Several respondents described their support as consisting primarily of a web page, a guidance document, or a single checkbox in the assurances process. Some rules with significant district-facing complexity, such as diploma requirements and district curriculum, were described as covering a broad range of sub-requirements under a single assurance, with guidance that is limited, outdated, or in need of refresh. In other cases, rule owners noted that guidance is actively being drafted but is not yet available, leaving districts without current, reliable resources in the interim.

Finally, several responses indicated that support for their rule has been meaningfully reduced or has disappeared altogether in recent years. Several rule owners noted that office hours, training, and active monitoring previously provided by the District and School Effectiveness Team were discontinued following the reauthorization of ESEA under ESSA. For rules related to teacher and administrator evaluation and core teaching standards, this has left districts with an Educator Effectiveness Toolkit and limited guidance documents but no active training, office hours, or



technical assistance. At least two respondents indicated they were unaware of any support currently in existence for their rules, and one noted explicitly that their team was assigned a rule only as the best available fit and conducts no substantive guidance or support work related to it.

Effectiveness of Rule Support

When asked to rate the effectiveness of current ODE support for Division 22 rules, 15 percent of respondents described the support as very effective, 29 percent as effective, 43 percent as somewhat effective, and 21 percent were unsure (table 5). While a slim majority of respondents expressed at least some confidence in existing supports, the distribution of responses, with nearly half rating supports as only somewhat effective and more than one in five unable to assess effectiveness at all, reflects a system in which the quality, reach, and measurability of support vary considerably across rules.

Among the rules where supports were seen as most effective, a common thread was the presence of dedicated staff members, active outreach, and layered resources working in concert. Rules related to dyslexia screening and teacher training, for example, were described as having high district compliance rates supported by clearly articulated requirements, annually updated approved lists, and accessible guidance, suggesting that when expectations are clear and resources are current, districts follow through. Similarly, restraint and seclusion supports were described as effective in part because centralized data collection ensures near-universal reporting, creating a built-in accountability mechanism that reinforces compliance. The primary improvement needs identified were incremental: enhanced data literacy tools for dyslexia screening, updated family communication resources, and more accessible one-page guidance documents.

Table 5. Effectiveness of provided rule implementation supports

Question	Effectiveness	Percentage of respondents
How effective are current supports?	Very effective	14.60%
	Effective	23.20%
	Somewhat effective	43.80%
	Not sure	20.80%

Source: NWCC analysis of rule owner survey data.

However, a significant number of responses pointed to a gap between the existence of support and their ability to drive meaningful or verifiable compliance. Several rule owners noted a persistent discrepancy between what districts self-report through the Division 22 assurances process and what is reflected in actual data, a pattern observed in areas such as health services and substance use prevention, where formal data collections indicate that many districts may not be in compliance despite reporting otherwise.

In substance use prevention specifically, respondents noted that while outreach has increased district engagement and plan submissions, many districts continue to rely on outdated practices,



lack a designated staff member with subject matter expertise, and need stronger guidance on evidence-based curriculum selection, staff training, and intervention practices. Similarly, for instructional materials adoption, respondents identified a need for proactive technical assistance, better identification of districts using independent adoptions, and office hours to support compliance before complaints arise.

Additionally, respondents identified support that are limited in scope, primarily reactive in nature, or constrained by organizational gaps that have not been resolved. Graduation requirements present one of the most complex examples: Respondents noted that Oregon's graduation framework has grown increasingly fragmented through ad hoc legislative additions and that existing guidance is limited or outdated. Similarly, respondents identified a need for updated guidance around modified and extended diplomas, including decision-making frameworks for choosing diploma pathways and practical guidance on modifying curriculum and awarding credits. For the Educational Equity Advisory Committees rule, the respondents noted that full support is still in development and that regional partnership structures, ongoing feedback loops, and implementation tools will be needed as the rule comes into full effect statewide.

Respondents also expressed ambivalence about support quality related to a fundamental inability to assess effectiveness. Several rule owners acknowledged that without dedicated oversight, outcome data, or regular district engagement, there is simply no way to know whether current supports are working. This was especially evident for rules related to teacher and administrator evaluation and core teaching standards. Respondents for these rules called explicitly for an organizational decision about where this work should live within ODE—a need echoed across several other rules where responsibility has become similarly unclear. More broadly, respondents across multiple areas identified the complaints and appeals process as under-resourced, noting that a current backlog limits ODE's ability to respond to immediate needs and that additional staffing would be required to introduce more proactive mechanisms such as targeted audits.

Relationship of Rule to Oregon Performance Growth Targets

When respondents were asked to assess the alignment of Division 22 rules with Oregon's performance growth targets, 34 percent identified significant alignment, 32 percent moderate alignment, 22 percent limited alignment, 8 percent no alignment, and 2 percent were unsure (table 6). These aggregate figures reflect a Division 22 landscape in which most rules have at least some connection to Oregon's accountability framework, but where that connection varies in directness, specificity, and actionability depending on the nature of the rule.

Rules identified as having the most significant alignment with Oregon's Performance Growth Targets tend to be those most directly tied to assessment, graduation, and early literacy outcomes. Statewide assessments and assessment participation were described as tightly bound to accountability measures, as standardized testing currently serves as the primary mechanism through which ODE measures student learning.

Graduation requirements, including the modified diploma, extended diploma, and general diploma framework, were similarly identified as central to key statewide metrics, given that graduation and



school completion rates remain among the most visible indicators of system performance. Rules related to dyslexia, teacher training related to dyslexia and universal screenings for risk factors of dyslexia, were highlighted as directly aligned with grade 3 reading proficiency goals and the state's broader Early Literacy Success initiative, with respondents noting their foundational role within emerging SB 141 accountability structures. Substance use prevention and suicide prevention were also identified as significantly aligned, given their well-documented connections to attendance, belonging, and graduation—metrics that sit at the core of Oregon's Student Success accountability framework.

A second cluster of rules was seen as moderately aligned, typically through an indirect but meaningful connection to student outcomes. Physical education requirements were noted as supported by research linking physical activity to academic performance, attendance, and belonging. Required instructional time was identified as a growing area of policy attention, with the amount of instructional time increasingly scrutinized by advocacy organizations, the Governor's Office, and the media. Instructional materials adoption and independent adoptions of instructional materials were linked to English language arts and math outcome targets through the state's High-Quality Instructional Materials initiative. Rules related to teacher and administrator evaluation and professional standards, while identified as moderately rather than significantly aligned, were framed as important inputs to student success, with effective teachers and principals recognized as among the most powerful levers for improved outcomes. The educational equity advisory committees rule was noted for its connections to the ODE Strategic Plan, District Improvement Plans, and federal funding streams, while kindergarten assessment was identified as directly relevant to early grade attendance accountability measures.

Table 6. Extent rule aligns with performance growth targets

Question	Impact on PGTs	Percentage of respondents
To what extent does this rule impact student success or align with Oregon's performance growth targets?	Significant	34.7%
	Moderate	32.7%
	Limited	22.40%
	None	8.20%
	Unsure	2.00%

Source: NWCC analysis of rule owner survey data.

Rules identified as having limited or no alignment tended to fall into two categories: those that address individual student safety and well-being without a direct line to system-level performance metrics and those that are primarily administrative or procedural in nature. Nondiscrimination rules, including equal education opportunities, Every Student Belongs, and agreements with voluntary organizations, were described as critically important for individual student safety and belonging but as not having a direct, measurable connection to Oregon's performance growth targets as currently defined. Similarly, asbestos management, child abuse reporting policies, fingerprinting, and the veterans diploma were described as valuable requirements that operate



outside the accountability framework. Notably, alternative schools and programs received some of the most critical feedback in this category, with respondents noting that the current rule has little connection to student experience or outcomes and calling for a comprehensive rewrite.

Desired Role of the Oregon Department of Education and Proposed Rule Changes

When asked what role the field wants ODE to play in relation to Division 22 rules, among the 46 respondent rule owners the most prominent theme, voiced by 54 percent of respondents, was a desire for ODE to serve as a clear standards-setter, guidance provider, and responsive technical assistance partner. Across a wide range of rules, districts and schools consistently indicated they want ODE to communicate expectations clearly, keep guidance current, and be accessible when questions arise, whether through office hours, training, direct outreach, or on-demand technical support.

A smaller but notable segment, approximately 13 percent, favored a more hands-off approach, expressing a preference for local decision-making authority and limited ODE involvement beyond funding or basic compliance requirements. Perhaps most telling were the 9 percent of respondents who explicitly identified a divergence between what districts want and what communities and parents want: Districts tended to favor reduced oversight and greater flexibility, while parents, students, and community members consistently called for more robust, timely, and transparent enforcement. An additional 11 percent indicated a desire for more active compliance monitoring and enforcement from ODE, particularly in areas such as teacher-librarian staffing, concussion safety, and health services.

Finally, when asked whether revisions are needed for their assigned Division 22 rules, 45 respondents revealed a landscape in which most rules have at least some identified need for change. The largest category, 36 percent of respondents, identified specific clarity, definitional, or technical issues requiring attention, including the absence of critical definitions, such as the meaning of “self-contained special education classroom” in the extended diploma rule, and structural ambiguities that create inconsistent implementation across districts.

A significant 27 percent identified deeper structural or policy-level revisions, including rules that no longer align with their enabling statute, rules that have not kept pace with changes in nondiscrimination law, and rules in which respondents called for increased transparency requirements, removal of outdated provisions such as counting professional development as instructional time, or in at least one case, a full rewrite focused on student experience and outcomes. An additional 11 percent reported that revisions are already actively underway, including rules tied to recent legislation on safety and emergency planning, high-quality instructional materials adoption schedules, and anticipated compliance timelines for the educational equity advisory committees rule. Only 24 percent of respondents felt their rule required no changes at this time.



State Comparison

To understand how Oregon's Division 22 standards compare to peer states, we examined K–12 administrative rules across 13 states. This involved two approaches. First, we compared states by structural similarity to Oregon: policy-aligned states (California, Washington), states with recent rule revisions (Montana), and regionally diverse peers (Massachusetts, Minnesota). Second, we drew on academic indicators to compare states with measurable performance gains (Alabama, Louisiana, Mississippi, New York, Texas) against those with minimal improvement over time (Alaska, Nebraska, Vermont).

State Comparison: Administrative Rules

This section presents a comparative analysis of Oregon's Division 22 administrative standards with the administrative standards of five other states (California, Massachusetts, Minnesota, Montana, and Washington) recommended for comparison by the core group of ODE leaders, organized by the five domains of Oregon's framework:

- High-quality learning
- Aligned and focused educational systems
- Engaged partners and communities
- Safe and inclusive schools
- Committed and supportive staff

For each domain, we examined whether comparison states had a comparable administrative rule and, if so, the extent to which that rule was similar to Oregon's.

Across all five domains, the aligned and focused educational systems domain showed the greatest consistency, with several rules present and similar across all five states. In contrast, the engaged partners and communities domain showed the least alignment, with no states having rules related to educational equity advisory committees or rights of parents of TAG students. Overall, while many administrative rules were shared across states, there was also meaningful variation.

High-Quality Learning

Although some standards were shared, the administrative standards related to high-quality learning varied considerably across states. Of the 14 administrative rules:

- Four administrative standards were present in all five comparison states: diploma requirements, human sexuality education, physical education requirements, and media programs.
 - Of these, there was variation in the requirements, but two administrative rules (diploma requirements and media programs) had the greatest similarity with three states (Minnesota, Montana, and Washington).
- No states had a requirement related to the postponement of purchase of state-adopted instructional materials, and only one other state had a rule related to extended diplomas (California), but it was substantially different in requirements.



Table 7 provides a complete overview of the analysis.

Table 7. Comparison of high-quality learning standards

Standard	CA	MA	MN	MT	WA	Number of states with comparable rule	Number of states with similar requirements
581-022-2000 Diploma Requirements	≠	≠	✓	✓	✓	5	3
581-022-2010 Modified Diploma	✓	≠	≠	x	≠	4	1
581-022-2015 Extended Diploma	≠	x	x	x	x	1	0
581-022-2020 Certificate of Attendance	✓	✓	x	x	✓	3	3
581-022-2050 Human Sexuality Education	✓	≠	≠	≠	✓	5	2
581-022-2055 Career Education	≠	x	✓	✓	≠	4	2
581-022-2263 Physical Education Requirements	✓	≠	≠	≠	≠	5	1
581-022-2340 Media Programs	≠	≠	✓	✓	✓	5	3
581-022-2350 Independent Adoptions of Instructional Materials	✓	x	x	x	≠	2	1
581-022-2355 Instructional Materials Adoption	✓	x	≠	≠	≠	4	1
581-022-2360 Postponement of Purchase of State-Adopted Instructional Materials	x	x	x	x	x	0	0
581-022-2440 Teacher Training Related to Dyslexia	≠	≠	≠	x	≠	4	0
581-022-2500 Programs and Services for TAG Students	x	x	✓	≠	✓	3	2
581-022-2505 Alternative Education Programs	≠	≠	✓	x	✓	4	2

Source: NWCC analysis of the administrative rules in selected states.

Note: ✓ represents “Exists in the state with similar standards,” ≠ represents “Exists in the state with different standards,” x represents “Does not exist in the state”



Aligned and Focused Educational Systems

The administrative standards related to aligned and focused education systems showed the most consistency across states, although requirements varied. Looking at 19 administrative rules, we find that:

- Seven administrative standards were present in all five comparison states: district curriculum; district improvement plan; records and reports; special education for children with disabilities; required instructional time; personnel; and universal screenings for risk factors of dyslexia. Two administrative rules were shared across four comparison states: comprehensive school counseling and administration of state assessments.
 - Of these, three administrative rules were similar across all other states: special education for children with disabilities, required instructional time, and personnel. One administrative rule was similar across four states: universal screenings for risk factors of dyslexia.
- In this domain, at least one other state had an administrative rule present within their administrative code, but the one with the least number of states included the exception of students with disabilities from state assessments (which was present in California but differed substantially in requirements).

Table 8 provides a complete overview of the analysis.

Table 8. Comparison of aligned and focused educational systems standards

Standard	CA	MA	MN	MT	WA	Number of states with comparable rule	Number of states with similar requirements
581-022-2025 Credit Options	≠	x	x	≠	✓	3	1
581-022-2030 District Curriculum	≠	≠	≠	✓	✓	5	2
581-022-2060 Comprehensive School Counseling	≠	x	≠	✓	✓	4	2
581-022-2100 Administration of State Assessments	✓	≠	✓	x	✓	4	3
581-022-2110 Exception of Students with Disabilities from State Assessments	≠	x	x	x	x	1	0
581-022-2115 Assessment of Essential Skills	≠	✓	x	x	≠	3	1
581-022-2120 Essential Skill Assessments for English Language Learners	≠	≠	x	x	x	2	0



Standard	CA	MA	MN	MT	WA	Number of states with comparable rule	Number of states with similar requirements
581-022-2130 Community-Informed Information Gathering Process at Kindergarten	x	x	≠	x	≠	2	0
581-022-2250 District Improvement Plan	✓	✓	≠	≠	✓	5	3
581-022-2260 Records and Reports	✓	✓	≠	✓	≠	5	3
581-022-2265 Report on PE Data	≠	x	x	x	✓	2	1
581-022-2300 Standardization	x	≠	x	✓	≠	3	1
581-022-2305 District Assurances of Compliance with Public School Standards	x	x	≠	≠	x	2	0
581-022-2315 Special Education for Children with Disabilities	✓	✓	✓	✓	✓	5	5
581-022-2320 Required Instructional Time	✓	✓	✓	✓	✓	5	5
581-022-2325 Identification of Academically Talented and Intellectually Gifted Students	x	x	✓	≠	✓	3	2
581-022-2335 Daily Class Size	≠	x	x	≠	x	2	0
581-022-2400 Personnel	✓	✓	✓	✓	✓	5	5
581-022-2445 Universal Screenings for Risk Factors of Dyslexia	✓	✓	✓	≠	✓	5	4

Source: NWCC analysis of the administrative rules in selected states.

Note: ✓ represents “Exists in the state with similar standards,” ≠ represents “Exists in the state with different standards,” x represents “Does not exist in the state”

Engaged Partners and Communities

The administrative standards related to engaged partners and communities varied across states, with only some states having administrative standards like that of Oregon. Looking at six administrative standards, we find that:

- Two administrative standards were present in all five comparison states: veterans diploma and individual student assessment and recordkeeping and reporting. However, these differed substantially across states regarding the requirements (only Minnesota had similar requirements to Oregon across these two standards).



- One administrative rule was shared across four comparison states: school and district performance report criteria, and this was similar to three of the four states (Massachusetts, Minnesota, and Washington).
- No states had a standard related to the educational equity advisory committees or rights of parents of TAG students.

Table 9 provides a complete overview of the analysis.

Table 9. Comparison of engaged partners and communities standards

Standard	CA	MA	MN	MT	WA	Number of states with comparable rule	Number of states with similar requirements
581-022-2005 Veterans Diploma	≠	≠	✓	≠	≠	5	1
581-022-2255 School and District Performance Report Criteria	≠	✓	✓	x	✓	4	3
581-022-2270 Individual Student Assessment, Recordkeeping and Reporting	≠	≠	✓	≠	≠	5	1
581-022-2307 Educational Equity Advisory Committees	x	x	x	x	x	0	0
581-022-2330 Rights of Parents of TAG Students	x	x	x	x	x	0	0
581-022-2370 Complaint Procedures	✓	x	x	x	≠	2	1

Source: NWCC analysis of the administrative rules in selected states.

Note: ✓ represents “Exists in the state with similar standards,” ≠ represents “Exists in the state with different standards,” x represents “Does not exist in the state”

Safe and Inclusive Schools

The administrative standards related to safe and inclusive schools varied across states, but many states had administrative standards like that of Oregon. Looking at 16 administrative standards, we find that:

- One administrative standard was similar across all states: safety of school sports – concussions.
- Two administrative standards were similar across four states: equal education opportunities and fingerprinting of subject individuals in positions not requiring licensure as teachers, administrators, personnel specialists, school nurses.
- Three administrative standards were not present in any comparison state: asbestos management plans; agreements entered into with voluntary organizations, and Every Student Belongs.



Table 10 provides a complete overview of the analysis.

Table 10. Comparison of safe and inclusive schools standards

Standard	CA	MA	MN	MT	WA	Number of states with comparable rule	Number of states with similar requirements
581-022-2045 Substance Use Prevention and Intervention Plan	x	✓	≠	x	x	2	1
581-022-2205 Policies on Reporting of Child Abuse	≠	≠	x	x	≠	3	0
581-022-2210 Anabolic Steroids and Performance Enhancing Substances	≠	x	x	x	x	1	0
581-022-2215 Safety of School Sports – Concussions	✓	✓	✓	✓	✓	5	5
581-022-2220 Health Services	≠	✓	✓	x	≠	4	2
581-022-2223 Healthy and Safe Schools Plan	x	x	x	≠	x	1	0
581-022-2225 Emergency Plans and Safety Programs	✓	≠	✓	≠	✓	5	3
581-022-2230 Asbestos Management Plans	x	x	x	x	x	0	0
581-022-2267 Annual Report on use of Restraint and Seclusion	✓	✓	≠	x	✓	4	3
581-022-2308 Agreements Entered Into with Voluntary Organizations	x	x	x	x	x	0	0
581-022-2310 Equal Education Opportunities	✓	✓	✓	≠	✓	5	4
581-022-2312 Every Student Belongs	x	x	x	x	x	0	0
581-022-2345 Auxiliary Services	≠	≠	✓	≠	≠	5	1



Standard	CA	MA	MN	MT	WA	Number of states with comparable rule	Number of states with similar requirements
581-022-2430 Fingerprinting of Subject Individuals in Positions Not Requiring Licensure as Teachers, Administrators, Personnel Specialists, School Nurses	✓	✓	✓	≠	✓	5	4
581-022-2510 Suicide Prevention Plan	✓	≠	≠	≠	✓	5	2
581-022-2515 Menstrual Dignity for Students	✓	x	✓	x	✓	3	3

Source: NWCC analysis of the administrative rules in selected states.

Note: ✓ represents “Exists in the state with similar standards,” ≠ represents “Exists in the state with different standards,” x represents “Does not exist in the state”

Committed and Supportive Staff

All administrative standards in this domain were shared across comparison states but varied in their similarity. Looking at four administrative standards, we find that:

- Three of the four administrative standards were present across five comparison states: teacher and administrator evaluation and support; core teaching standards; and educational leadership–administrator standards, which were similar with three states (Massachusetts, Minnesota, and Washington).
- Personnel policies were present in three other states (California, Montana, and Washington) but differed substantially in the requirements.

Table 11 provides an overview of the analysis.



Table 11. Overview of comparison of committed and supportive staff standards

Standard	CA	MA	MN	MT	WA	Number of states with comparable rule	Number of states with similar requirements
581-022-2405 Personnel Policies	≠	x	x	≠	≠	3	0
581-022-2410 Teacher and Administrator Evaluation and Support	≠	✓	✓	≠	✓	5	3
581-022-2415 Core Teaching Standards	≠	✓	✓	≠	✓	5	3
581-022-2420 Educational Leadership–Administrator Standards	≠	✓	✓	≠	✓	5	3

Source: NWCC analysis of the administrative rules in selected states.

Note: ✓ represents “Exists in the state with similar standards,” ≠ represents “Exists in the state with different standards,” x represents “Does not exist in the state”

State Comparison: Accountability Models

At the request of the core group of leaders from ODE we examined the accountability models of states that have recently demonstrated variable improvements in student academic outcomes. States included have shown notable gains in academic performance over time: Alabama, Louisiana, Mississippi, New York, and Texas. For comparison, we also include Alaska, Nebraska, and Vermont, where academic performance has remained relatively stable or shown only modest improvement over the same period but there are similar demographics, geographic context, and governance structures. By examining these states’ systems, we were hoping to identify what’s effective that could inform the design of a system for Oregon and therefore our recommendations. Table 8 identifies relevant administrative code provisions related to accountability, summarizes each state’s accountability framework, and provides contextual information about the state’s accountability model.

- Four states (Alabama, Louisiana, Mississippi, and Texas) use A–F rating systems that make performance visible to the public, trigger differentiated intervention and give the state authority to act when districts consistently underperform. A transparent, public-facing rating system was absent in the three states (Alaska, Nebraska, and Vermont) despite having multi-indicator accountability systems that include academic achievement, growth, and graduation rates.
- New York’s risk-based monitoring approach is most like Oregon’s current accountability model and offers public-facing performance indicators.
- Two states (Nebraska and Vermont) operate under strong local control conditions that constrain the state’s ability to mandate curriculum, ensure implementation fidelity, or direct resources toward targeted academic intervention.

Table 12 presents an overview of specific results by each reviewed state.



Table 12. Overview of comparison state accountability models

State / Progress	Administrative code	Sections with accountability rules	Accountability model	Additional notes
Alabama (Notable gain)	Administrative Code Chapter 290-4-1	290-4-1-.01: Education Accountability 290-4-1-.02: Educational Intervention 290-4-1-.03: Grading System for School Districts and Schools 290-4-1-.04: Flexibility for Students in Failing Schools	Performance-based; A–F letter grades for schools and districts	Last revised 2/12/2024. State Superintendent authorized to review, examine, conduct hearings, and intervene. State may assume direct management of noncompliant local boards.
Louisiana (Notable gain)	Administrative Code Title 28	Part XI (Bulletin 111): Louisiana School, District, and State Accountability System Part XCI (Bulletin 1922): Compliance Monitoring Procedures (revised March 2017) Part CXV (Bulletin 741): Louisiana Handbook for School Administrators	Performance-based; 2025–26: “Grow. Achieve. Thrive” system with equally weighted components	Every school district must participate in a district accountability program approved by Board of Elementary and Secondary Education (BESE).
Mississippi (Notable gain)	Administrative Code Title 7, Part 24	Mississippi Public School Accountability Standards, 2024: Permanent performance-based accreditation system established by State Board of Education State Board Policy Rule 2.1: Mississippi Public School Accountability Standards	Performance-based; annual A–F classification for schools and districts	Indicators: academic proficiency, student growth, graduation rate, college/career readiness, assessment participation rate.



State / Progress	Administrative code	Sections with accountability rules	Accountability model	Additional notes
New York (Notable gain)	Commissioner's Regulations	Section 100.19: School accountability Section 100.21: School and district accountability	ESSA-based; indicators: academic achievement, English learner progress, attendance, graduation rate. Updated 2025–26 adds student growth and college/career/ civic readiness.	Most recently amended June 2025 by Board of Regents. New York State Education Department uses a risk-based monitoring approach.
Texas (Notable gain)	Administrative Code (TAC)	Chapter 97: Planning and Accountability Subchapter EE: Accreditation Status, Standards, and Sanctions 19 TAC Ch. 97: Accreditation statuses: Accredited; Accredited-Warned; Accredited-Probation; Not Accredited-Revoked	Performance-based; A–F rating system. Accountability manual filed annually as an administrative rule.	Manual developed by the Texas Accountability Advisory Group (TAAG) and advisory groups across three domains: Student Achievement; School Progress; Closing the Gaps.
Alaska (Stable progress)	Alaska Administrative Code Title 4, Chapter 06, Article 7	4 AAC 06.800: Purpose; 4 AAC 06.812: Alaska school performance system; 4 AAC 06.840: Designations of schools; 4 AAC 06.845: School improvement plan; 4 AAC 06.864: Comprehensive support and improvement; 4 AAC 06.872: State system of support and interventions	ESSA-based; tiered designation system (CSI, TSI, Universal Support) with escalating state involvement based on performance	Risk assessments conducted annually for all 54 districts. Monitoring cycle of every 4–6 years depending on risk. State reported a +19 percentage point gain on its own state assessment between 2022 and 2024, though Alaska had also lowered proficiency cut scores during this period; gains have not appeared in NAEP results.



State / Progress	Administrative code	Sections with accountability rules	Accountability model	Additional notes
Nebraska (Stable progress)	Title 92 NAC Chapter 10 (Rule 10)	92-10-010: Accountability Reporting for School Systems and Accountability System for Public Schools and School Districts; Rule 10 effective June 2, 2024	AQuESTT framework; schools and districts classified annually as Excellent, Great, Good, or Needs Support to Improve across six tenets including student achievement and educator effectiveness	Annual Rule 10 Assurance Statement required from all accredited systems. Local control provisions mean districts retain full discretion over curriculum selection; Nebraska Department of Education cannot mandate instructional materials.
Vermont (Stable progress)	Vermont State Board Rules, Series 2000	Series 2000: Education Quality Standards (amendments effective July 1, 2025); Series 2360: Special Education Rules; Series 9500: English Learner Reporting	Quality-based; five-domain Education Quality Standards framework evaluated through Integrated Field Reviews and Continuous Improvement Plans; ESSA designations used for federal compliance	Monitoring conducted through annual review process, Integrated Field Reviews, and a five-year cyclic special education monitoring rotation. Strong local control; significant district-to-district variation in implementation of state frameworks. Act 127 school funding reform was abandoned after an incomplete implementation cycle.

Source: NWCC analysis of the accountability models in selected states.

Accountability is an important component of effective school systems; however, direct causal relationships between accountability models and school success cannot be assumed. For example, states that demonstrated significant academic gains often implemented targeted student improvement initiatives alongside changes to their accountability systems. This distinction is important because it highlights that multiple, coordinated, systemwide efforts were occurring simultaneously, any of which could have contributed to the observed improvements in student outcomes. In addition, other influential factors such as funding, staffing, and broader educational investments could also have contributed.



We identified three main types of initiatives that were occurring in these high-performing states. A more complete list is provided in table 13.

- **Structured literacy with dedicated coaching.** Alabama, Louisiana, and Mississippi all passed legislation requiring literacy coaching and foundational reading interventions in K–3, with Mississippi’s grade 3 promotion gate adding accountability for early reading mastery.
- **High-dosage tutoring.** Texas required it by law for students not meeting proficiency standards, and New York invested significantly in tutoring grants.
- **Extended learning time and expanded pathways.** Texas funded up to 30 additional school days for elementary students with measurable results, and Louisiana’s Jump Start program expanded career and technical education pathways that increased graduation rates. These states identified levers to extend learning time and broadened requirements.

Table 13. Comparison of initiatives to support academic improvement in high-performing states

State	Academic progress	Other state initiatives
Alabama	Ranked among the five highest-improving states in grade 4 mathematics achievement between both 2015 and 2024, and 2022 and 2024.	• Alabama Numeracy Act (Act 2022-249): Placed a state-funded math coach in every K–5 elementary school, paired with high-quality instructional materials and robust teacher and principal training. • Alabama Math, Science and Technology Initiative (AMSTI): Provided the professional development infrastructure supporting Numeracy Act coaches and broader math and science instruction improvement. • Alabama Math Standards Alignment: Realigned state math standards in 2019 to better reflect national NAEP expectations. • Alabama Literacy Act: Required a dedicated reading coach in every K–3 school to monitor data, identify struggling readers, and ensure students read at grade level by the end of third grade. • Education Trust Fund Investment Increases: Sustained \$15 million in supplemental funding for summer learning camps and after-school tutoring programs.



State	Academic progress	Other state initiatives
Louisiana	Ranked among the five highest-improving states in grade 4 mathematics and reading achievement between 2022 and 2024, grade 8 reading achievement between 2015 and 2024, and adjusted cohort graduation rates between 2018 and 2022.	• Jump Start Career Diploma Pathways: Expanded graduation pathways through 11 public-private career and technical education tracks tied to workplace experiences and industry-recognized credentials. • New Provisions for Credit Recovery Program: Updated policy to allow students who have failed courses to retake them without repeating a full academic year. • Science of Reading Legislation (Senate Bill 216, 2021): Required all K–3 teachers to complete professional development in foundational literacy skills, with Louisiana’s fourth graders subsequently leading the nation in reading progress on the 2024 NAEP.
Mississippi	Ranked among the five highest-improving states in grade 4 mathematics and reading achievement between 2015 and 2024, grade 8 mathematics achievement between 2022 and 2024, grade 8 reading achievement between 2015 and 2024, and adjusted cohort graduation rates between 2018 and 2022.	• Literacy-Based Promotion Act (LBPA): Raised third grade reading expectations and deployed a multifaceted literacy strategy—including coaches, intensive interventions, and parent communication requirements—that improved third grade reading proficiency in every school district between 2016 and 2019, with a peer-reviewed study confirming its impact. • State-Funded Pre-K Expansion: Established Mississippi’s first state-funded pre-K program, growing from 11 early learning collaboratives in 2013 to 35 by 2024.
New York	Ranked among the five highest-improving states in grade 4 mathematics achievement between 2022 and 2024 and among the five states with the largest increases in adjusted cohort graduation rates between 2018 and 2022 but also faced large disruptions during the COVID-19 pandemic.	• Federal Relief Funding and State Learning Loss Grants: Distributed the nation’s largest ARP-ESSER allocation to local districts, supplemented by state Learning Loss grants, with research linking pandemic relief funding to academic recovery particularly in mathematics. • State Tutoring Grant Program: Funded tutoring support for at-risk students in grades 3–8, though independent evaluation of statewide impact remains limited and results from New York City research were mixed. • Regents Examination Waivers and Graduation Flexibilities: Expanded exemptions and credit recovery options during and after the pandemic, with approximately 88 percent of New York City 2022 graduates receiving at least one Regents exemption—changes that likely contributed to graduation rate gains and should be considered when interpreting improvement data.



State	Academic progress	Other state initiatives
Texas	Increased its average grade 4 mathematics score by 1.93 points. Gains were particularly notable among African American and Asian students, whose scores increased by approximately four points, and among economically disadvantaged students, whose scores increased by five points, exceeding the national average gain for that subgroup.	• HB 4545 Accelerated Instruction Requirements: Required high-dosage tutoring and accelerated instruction for grades 3–8 students not meeting proficiency standards on the STAAR, though statewide impact has been difficult to isolate due to variability in district implementation. • Teacher Incentive Allotment (TIA): Provided performance-based compensation to attract and retain highly effective teachers, with emerging research linking the program to moderate improvements in student achievement and reduced teacher turnover. • Additional Days School Year (ADSY): Funded districts to add up to 30 instructional days for elementary students, with participating campuses reporting stronger math and reading gains than nonparticipating campuses during the 2022–23 school year.

Source: NWCC analysis of the school improvement context in selected states.



Foundational Recommendation for Improvement: Establish a Formal Standards Review and Governance Process

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 proposed standards before formal adoption or to evaluate related legislative mandates that districts or ESDs must follow but that do not fall under Divisions 22 or 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.** (Table E1 in Appendix E provides a summary of the analysis findings, which 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. 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 review of all existing Division 22 and Division 24 standards and would thereafter apply to any proposed new legislation affecting standards before adoption. Criteria and decisions made transparently, with documented stakeholder input, would help build the trust and buy-in needed for effective implementation across the diversity of Oregon's district contexts.

This review and its recommendations provide a valuable starting point for that work. However, the recommendations presented here should be viewed as an initial framework rather than a final determination. Completing this effort will require a more comprehensive and inclusive review process that engages Oregon's major educational stakeholders and partners, including educators, district and school leaders, students, families, community organizations, Tribal partners, advocacy organizations, and policymakers. Broad stakeholder involvement will be essential to ensure that any revisions to Division 22 and Division 24 standards are rigorous, equitable, practical to implement, and reflective of Oregon's diverse educational contexts.

We believe this recommendation is essential for advancing the actions arising from this review. While the review team has provided recommendations related to specific standards that are directly connected to student outcomes, the following recommendations should be viewed as



a starting point rather than a complete solution. Significant additional analysis, stakeholder input, and greater specificity will be needed to finalize what is included in statute. **Therefore, we recommend 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.**

We present a proposed timeline for all proposed recommendations in table 16.



ORS 327.103 (Division 22) Recommendations

Before presenting additional recommendations, it is important to distinguish among the different policy tools available within Oregon. Throughout stakeholder engagement, participants frequently raised concerns that Division 22 and Division 24 standards have become a collection of requirements that serve different purposes but are often treated the same. Some provisions establish essential statewide minimums that every student should receive regardless of geography or local context. Others describe aspects of school quality that are better understood as continuous improvement efforts rather than compliance requirements. Still others may be more appropriately addressed through guidance, technical assistance, funding incentives, or local decision-making.

Administrative rules are intended to establish clear, measurable, and enforceable minimum requirements, while accountability measures and continuous improvement indicators are designed to assess the quality and effectiveness of educational practice over time. Guidance and best practices provide research-informed direction without creating statewide compliance obligations. This distinction is critical because the effectiveness of Oregon’s accountability system depends not only on identifying what matters most for student success, but also on selecting the appropriate policy mechanism to support implementation, monitoring, improvement, and local innovation.

The recommendations that follow are grounded in this principle: Statewide requirements are reserved for those conditions that are essential, measurable, and appropriate for uniform implementation, while other priorities are supported through accountability systems, technical assistance, and continuous improvement structures aligned with the goals of SB 141.

NWCC recommends that ODE lead the development and implementation of the recommendations outlined below in close consultation with the collaborators listed in table 14.

The list of collaborators is not exhaustive but reflects the needs of those most impacted by the proposed recommendations, as well as the widespread feedback we received from stakeholder groups to include community representation in the process as much as possible. For each recommendation, we provide an additional list of specific collaborators and potential considerations.

Table 14. Oregon education system collaborators and role for Division 22 revision

Collaborators	Primary role in standards reform
Oregon State Legislature	Statutory authority, funding, and structural accountability mandates
Oregon Department of Education	Standards design, guidance, monitoring, and enforcement systems
Governor’s Office	Cross-agency leadership, equity, and interagency alignment
Oregon State Board of Education	Policymaking and rule-adopting body; review, amend, and adopt administrative rules
Education service districts	Regional translation, differentiated support, and feedback to state



Collaborators	Primary role in standards reform
School districts	Fidelity of implementation, community engagement, and input to revision
Community members and families	Accountability, advocacy, and centering underserved student needs

Source: NWCC review of Oregon's statewide education system.

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

Oregon's Division 22 administrative rules have governed basic conditions of schooling for decades, built on a compliance logic that established minimum floors and documented adherence through assurances and self-reports. That approach made sense when the primary concern was ensuring schools met minimum operational standards. But as Oregon's understanding of student success has evolved, Division 22 has not kept pace. Stakeholder engagement revealed the current iteration of Division 22 has become both too rigid in some areas and too vague in others, while remaining only loosely connected to student outcomes.

Educators, administrators, and community partners consistently described Division 22 as administratively burdensome without being educationally meaningful. They reported spending significant time on compliance documentation that yielded little insight into student learning, school improvement, or resource deployment. Many expressed frustration that straightforward operational matters required the same attention as complex instructional questions where guidance would be more valuable than a compliance checkbox.

Yet stakeholders were clear: standards matter. They sought a different kind of regulation, one grounded in evidence about school effectiveness, organized around outcomes, and designed to support continuous improvement rather than merely document the absence of violations.

Restructure Division 22 and School Quality Standards

We recommend Oregon restructure its approach to school quality standards by retaining standards that are directly connected to student outcomes and can be measured in an explicit binary way. The framework and criteria developed in the first, foundational recommendation should be applied, and those standards that remain should be non-negotiable minimum expectations that are clear, consistently measurable, and enforceable statewide. Most importantly, these standards should be directly connected to student outcomes.

Example Division 22 Standards to Retain

The following categories in table 15 represent domains in which standards are binary, measurement is clear cut, and the minimum expectation is truly non-negotiable. This list serves as a starting framework. (See Appendix D for a rule-by-rule analysis of ease of measurement, which can provide additional information.)



We recommend ODE and collaborators (e.g., district leaders and ESDs) conduct a rule-by-rule review by first developing clear criteria for determining which standards represent statewide minimum expectations, then reviewing each existing standard against criteria such as student impact, measurability, legal necessity, and statewide relevance. (See table E1 in Appendix E for a summary of findings from the analysis that can be used as a starting place for assessing how standards meet defined criteria).

The review should also provide explanatory guidance describing how retained standards support student outcomes. Additionally, the same criteria should be used to identify and assess administrative rules that place mandates on districts, outside of Divisions 22 and 24, to determine whether they should be added. Throughout this process, ODE should prioritize clarity and consistency of language. Standards meeting these criteria—such as whether they are connected to student outcomes, represent a genuine floor, are evidence-based, and warrant state-level setting—belong in Division 22. Standards that do not meet these criteria should be moved to a newly developed regulatory school quality framework and monitored as part of the framework process outlined in the next recommendation.

Table 15. Example Division 22 standards to retain

Domain	Rationale for retention
Instructional Time & School Calendar	Every student entitled to minimum instructional hours; straightforward to measure and report
Credit Requirements & Graduation Standards	Ensures diploma represents comparable educational experience regardless of school
Athletic & Extracurricular Safety Standards	Ensures compliance for student physical safety (concussions, heat illness, coach qualifications)
Physical Plant & Facility Safety	Structural integrity, sanitation, fire safety, accessibility—matters of basic health, not philosophy
Health & Safety Education Requirements	Substance abuse education and suicide prevention directly affect student well-being
Student Records & Privacy Requirements	Legal minimums (FERPA); either in compliance or not
Special Education Procedural Minimums	Basic compliance aligned with federal framework
Educator Licensure & Assignment Requirements	Binary standard: educator is licensed or not
English Language Learner Program Requirements	Reflects federal obligations and state commitments to equitable access

Source: NWCC analysis of Division 22 standards.



Key Collaborators

- Oregon State Board of Education
- Oregon State Legislature
- District leaders
- ESDs
- Advocacy organizations
- Families and community members

Implementation Considerations

- Develop clear criteria for determining which standards represent statewide minimum expectations
- Review each existing standard against criteria such as student impact, measurability, legal necessity, and statewide relevance
- Provide explanatory guidance describing how retained standards support student outcomes, such as short briefs for each standard that outline the rationale, connection to student outcomes, and information about monitoring
- Use the same criteria to identify and assess administrative rules that place mandates on districts, outside of Division 22 and 24, to determine whether they should be added to either set of standards
- Prioritize clarity and consistency of language
- Conduct a dissemination campaign (e.g., webinars, briefs) to build awareness of these changes, discuss where current standards may end up after the revision process, and share the final location of all revised standards

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

While the primary focus of Division 22 standards should be on those most closely linked to student outcomes with binary measurement, there are other standards that may require a measurement of “quality” (e.g., educational practice, school climate, instructional leadership, curriculum, professional development, family engagement, and continuous improvement systems) that are important but require a different type of assessment and accountability. These are not binary. They exist on a continuum of quality. They require professional judgment to evaluate, institutional capacity to improve, and meaningful data to monitor.

This is not to say that these standards are unimportant or lack association with student outcomes. To the contrary: Many are essential components of a quality education. Rather, they are poorly served by Division 22’s compliance-oriented regulation. Treating them as compliance checkboxes yields little insight into student learning, school improvement, or resource deployment and creates administrative burden without educational meaning. They are better served by structured accountability: annual reporting to local boards, assessment against shared rubrics, and submission of findings to ODE. This allows for the local control and contextual flexibility that stakeholders value



and the consistency in accountability and educational experience that students need to be successful. These standards can be adjusted based on need and local context.

The recommendation is to move this group of standards into a separate regulatory accountability and continuous improvement framework (see Recommendation 3), leaving Division 22 as a leaner, cleaner document focused exclusively on the non-negotiable minimums.

Key Collaborators

- Primary: Oregon State Board of Education
- Oregon State Legislature
- ESDs
- School district leaders
- Educator associations
- Family and community representatives

Implementation Considerations

- Establish formal criteria for determining whether a requirement belongs in statute, administrative rule, guidance, or accountability reporting. Consider criteria that are similar to our analysis of current rules (i.e., linked to student academic outcomes, easily measured, enforceable).
- Ensure that educational leaders with knowledge about how standards can be implemented are go-to resources for legislators when developing standards.
- Include stakeholder review before adoption or removal of standards.
- Conduct impact analyses examining implementation burden, cost, and expected outcomes.
- Create a transparent public review cycle with opportunities for feedback.

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

Beyond the binary compliance standards, we suggest that ODE develop a regulatory, continuous improvement framework for school quality that aligns with existing student success priorities:

- High-quality learning experiences for all students
- Aligned and focused education systems
- Engaged partners and communities
- Safe and inclusive schools
- Committed and supported staff

Reporting and monitoring should be similar to the current system and occur through an annual process led by local school boards (see the discussion of annual school reporting later in this section) and supported by ODE. This framework should define the essential components of school success, enabling schools and districts to regularly assess their current performance against a shared vision of excellence and to document and track improvement efforts in targeted areas of need. To support and better contextualize this consideration, NWCC developed an example rubric (see Appendix F) that could be used by local school boards and ODE to guide annual reporting.



This proposed framework identifies five priority areas for monitoring, aligned with Oregon’s student success priorities. Each priority area is supported by core components evidentially associated with high-quality schools (Javornik & Klemenčič Mirazchiyski 2023), along with measurable indicators aligned to Oregon’s system health measures (Oregon Department of Education, 2025), forming the evidence base for assessment and monitoring.

Priority 1. High-Quality Learning Experiences for All Students

Effective schools ensure high-quality instruction and positive student interactions in every classroom. Teachers use student data to guide instructional decisions systematically, embedded in weekly cycles of assessment, analysis, and adjustment. Curriculum is rigorous, culturally responsive, and aligned to state standards. Students are college and career ready and feel empowered and prepared for life beyond school. Key indicators aligned to system health measurements include:

- Regular school attendance and on-track status at end of grade 9
- Reading at grade level; engagement with reading, writing, math, science, and social science at grade level (in native language and English)
- High school graduation rates
- College and career readiness measures and student empowerment for life beyond school
- Student achievement and growth; assessment outcomes and gains disaggregated by student group
- Instructional quality via observation rubric scores and walkthrough data
- Frequency of data cycles and evidence of instructional adjustments based on data

Priority 2. Aligned and Focused Educational Systems

Effective schools operate within educational systems that are coherent, aligned, and focused on student outcomes. Local curriculum, instruction, and assessment are aligned to state standards. Data systems support decision-making at all levels. School improvement efforts are intentional, grounded in evidence, and supported by adequate resources. Key indicators aligned to system health measurements include:

- Continuous improvement efforts focused on student needs and aligned with strong instructional practices
- Multiple forms of data used to drive decision-making processes
- Strong alignment across pre-K–12 and postsecondary education
- Ongoing and meaningful collaboration with Tribal partners
- Alignment of curriculum, instruction, and assessment to state standards
- Continuity of learning across grade levels and transitions (elementary to middle school, middle school to high school, high school to postsecondary)
- Evidence-based improvement plan implementation
- Resource allocation aligned to identified needs



Priority 3. Engaged Partners and Communities

Effective schools cultivate genuine partnerships with families and the broader community—not merely involvement, but authentic collaboration in the educational enterprise. Families are welcomed, respected, and engaged as partners. Communication is two-way, accessible in multiple languages, and responsive to family needs. Student experiences are centered through regular use of Student Success Plans. Key indicators aligned to system health measurements include:

- Community engagement practices leveraging intentional processes
- Student Success Plans used and consulted regularly to center student experiences
- Family engagement participation rates at conferences, events, workshops, and school activities
- Two-way communication frequency; family survey data on trust and satisfaction
- Representation in decision-making through advisory councils and governance participation, including Tribal partners
- Community partnership involvement and volunteerism

Priority 4. Safe and Inclusive Schools

Effective schools establish safe, inclusive, and supportive environments where all students and staff members feel they belong. This begins with a strong, shared vision and norms understood by everyone. Climate and culture support student well-being and sense of belonging. Discipline practices are equitable and restorative. Student mental health needs are met in accordance with Oregon’s Integrated Model of Mental Health. Key indicators aligned to system health measurements include:

- Students feel safe within their classrooms and schools
- Students feel a sense of belonging within their classrooms and schools
- Students’ mental health needs are met in accordance with Oregon’s Integrated Model of Mental Health
- Student, staff, and family climate survey results; belonging, trust, and safety measures
- Attendance and chronic absenteeism rates
- Discipline incident rates disaggregated by student group

Priority 5. Committed and Supported Staff

Effective schools are staffed by educators who are qualified, supported, and committed to their profession. Staff members feel supported and valued beginning with the recruitment process. Teachers participate in consistent job-embedded professional learning and coaching. Leaders set measurable goals and provide pathways and support to all staff members to reach goals. State and regional partnerships create inclusive working conditions. Key indicators aligned to system health measurements include:



- Staff members feel supported and valued beginning with the recruitment process
- Staff members participate in consistent job-embedded professional learning and coaching
- State and regional partnerships between pre-K–12, higher education, and workforce create inclusive working conditions
- Leaders set measurable goals and provide pathways and support to all staff members to reach goals
- Teacher retention, satisfaction, and organizational health measures are positive
- Professional development participation rates are aligned to school improvement goals
- Staff surveys on job satisfaction, perceived support, and organizational health are positive
- Teachers participate in shared decision-making and leadership structures

A sample rubric aligned to these five priorities is included in Appendix F. This rubric could be used by local school boards.

Much of this data is already being collected. SB 141 and existing district and ODE reporting infrastructure capture significant portions of it. The value of this recommendation is not in creating new data collection burdens, it is in organizing existing data into a coherent review process that supports continuous improvement, requires a board-facing presentation that drives genuine local accountability, and informs the state’s understanding of where districts need support.

Annual School Reporting

Annually, each district should compile and present a school quality report (aligned to the rubric mentioned below) to its local board of education. This report would replace the current assurance process and would be grounded in the essential school quality domains identified by ODE (e.g., the five priorities identified above). This report should draw on data districts are already collecting under SB 141 and related accountability requirements, organized into a coherent narrative that identifies where the school is strong, where it is improving, and where it needs support.

Upon receiving the annual school quality report, the local board of education could use a shared rubric (see Appendix F for an example) to assess district performance. This rubric could serve multiple purposes. For example, it could structure the board’s conversation around the domains that matter most; create a common language for quality across districts statewide; provide clear guidance about what good practice looks like; and generate a consistent, documentable record ODE can use for monitoring and support. Stakeholders explicitly called for a public rubric of this kind, noting that districts frequently do not know what standard of evidence ODE expects. A rubric that articulates what “exemplary” and “proficient” practice looks like in concrete, observable terms transforms accountability from a surveillance function into a learning function. Because the report would also align with the standard domains, it would allow clarity around how district priorities align with state priorities, which would address a concern from stakeholders about the misalignment of current priorities.



The board's role is not merely to receive and transmit data, it is to engage substantively with evidence, ask hard questions, recognize genuine progress, and set expectations for improvement. The annual board review should be a public meeting, with the school quality report made available to the community in advance. Transparency is itself a driver of quality.

In developing and implementing this rubric, ODE should:

- Use existing SB 141 reporting structures whenever possible
- Minimize new reporting requirements and align to existing initiatives such as the unified application
- Develop common statewide rubrics and evidence guidance
- Pilot the framework before statewide implementation
- Build capacity for districts and boards to use the framework effectively

Submission to ODE

Following board review, the scored rubric and supporting data should be submitted to ODE through existing reporting infrastructure. This submission would then serve as a record of district quality for state accountability purposes, supporting the system of assurances that will exist within what remains of Division 22.

Key Collaborators

- Local school boards
- District leadership teams
- ESDs
- Educators
- Families and community partners

Implementation Considerations

- Establish how each player in the educational system is involved in the school quality framework, including their roles and responsibilities
- Offer technical assistance or build awareness for each player's role in the system
- Use existing SB 141 reporting structures whenever possible
- Minimize creation of new reporting requirements and align to existing initiatives, such as the Unified Application
- Develop common statewide rubrics and evidence guidance
- Pilot the framework before statewide implementation
- Build capacity for districts and boards to use the framework effectively



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

This suggestion supports the continuous improvement framework described above by establishing the accountability mechanisms and ODE posture necessary to make that framework function effectively (Weiss & McGuinn, 2017).

The success of this framework depends on ODE reorienting its relationship with districts. Stakeholders across every category—district administrators, board members, ESD staff members, and educators—described a current system that feels compliance-driven, reactive, and punitive. Districts reported that presenting problems to ODE triggers consequences rather than support, creating rational incentives for self-protection over transparency.

Stakeholder feedback indicated a preferred shift from ODE as actor of compliance to partner in improvement. In this partner relationship, when a district submits a rubric showing “beginning-level performance,” ODE’s first response would be to offer resources, connect the district to ESD support, identify peer districts that have navigated similar challenges, and collaborate on an improvement plan—not to issue findings of noncompliance. This does not mean abandoning enforcement. The binary minimums retained in Division 22, health and safety, instructional time, graduation requirements, be enforced consistently and with real consequences. But the distinction between non-negotiable compliance failures, which require enforcement, and the continuum of school quality captured by the rubric, which requires a support relationship, should be explicit.

This shift, reflected in current efforts already underway as mandated in SB 141 to establish a continuum of supports, as well as the establishment of regional support teams which are strategies outlined in the current strategic plan, is key continued focus for the state’s educational improvement.

Differentiated Support and Graduated Intervention

To support ODE in positioning themselves as a partner in improvement, ODE’s role in receiving submissions is not archival or performative. ODE must be more proactive in ensuring all audiences are aware that they are aggregating, analyzing, and using collected data to direct technical assistance, target monitoring resources, and identify systemic patterns. For example, using a rubric to identify District performance (see Appendix E for an example), districts consistently performing at Proficient or Exemplary levels should require less state attention than those at the Beginning level. ODE’s support functions should be calibrated accordingly, not as reward and punishment, but as rational allocation of finite resources toward where they can have the greatest impact.

A district that receives targeted assistance, engages in collaborative improvement planning, and continues to show little progress presents a different set of questions, ones involving governance, leadership capacity, and the fundamental obligation to students. Where rubric scores and student outcome data together show persistent, unresolved gaps, particularly among historically underserved focal student groups, ODE needs have the authority and obligation to escalate. That



escalation should 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 should be clearly defined, publicly known, and consistently applied.

This is a significant cultural shift for ODE and districts alike. High-performing districts currently bear the same compliance burden as struggling ones, neither efficient nor fair. Differentiated support needs a ceiling, however. Oregon's students, particularly those in districts where improvement has stalled despite sustained state investment, are not well served by indefinite patience. The framework proposed here is designed to be generous in its support orientation and firm in its ultimate commitment to outcomes.

Key Collaborators

- ESDs
- District improvement teams
- Local school boards
- Oregon State Legislature

Implementation Considerations

- Differentiate responses based on risk and performance
- Provide technical assistance before escalation whenever possible
- Develop transparent criteria for support, monitoring, and intervention, and socialize this across ESDs and districts
- Invest in staff capacity for coaching and improvement science

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.

Communication Expectations/Timelines

To ensure families are kept informed throughout the process, ODE should establish the following communication expectations:

- **Initial acknowledgment.** Families should receive acknowledgment of their complaint within five (5) business days of submission, confirming that the concern has been received and directing them to next steps
- **Regular status updates.** Families should receive a status update at minimum every thirty (30) calendar days until the matter is resolved, informing them of progress, any barriers encountered, and anticipated next steps
- **ODE kept in the loop.** ODE must remain informed throughout the complaint resolution process, receiving copies of all correspondence and staying apprised of ongoing developments, so that the state can fulfill its oversight role and ensure complaints are addressed appropriately
- **Resolution notification.** Once a complaint has been addressed or resolved, families should receive a written summary of the outcome, within five (5) business days of resolution, including any actions taken or planned

During development of this system, ODE should include clear expectations for responsiveness. However, the NWCC advises that it is not appropriate to establish a hard timeline for final resolution of complaints. This guidance reflects the reality that complaints may involve matters that could result in litigation, and imposing rigid resolution timelines could inadvertently prejudice the district's legal position or complicate ongoing legal proceedings. Accordingly, the focus should be on maintaining consistent, transparent communication with families throughout the process rather than on prescribing when a complaint must be closed.



The goal is not to create a complaint-driven enforcement regime but rather a feedback loop that surfaces concerns early, connects them to credible local governance, and triggers support before problems calcify into systemic failures. When families trust that the system will respond, they are more likely to engage. Districts that know community concerns will be heard have stronger incentives to be proactive about compliance.

Key Collaborators

- School districts
- Local school boards
- Family engagement organizations
- Community-based organizations
- Advocacy groups

Implementation Considerations

- Ensure accessibility in multiple languages
- Create transparent response timelines
- Establish clear communication protocols
- Protect against retaliation
- Use complaint trends to inform statewide improvement efforts



ORS 334.217 (Division 24) Standards Review and Key Findings

Standards Review

The NWCC team determined that a review of the Division 24 standards for ESDs would not be appropriate. The rules, as written, are far removed from student outcomes and often binary in measurement (e.g., yes or no). However, we were provided with an analysis of the Division 24 standards conducted by Gary Peterson, past director of the Oregon Association of Education Service Districts, in 2023, who reviewed each standard for relevance and indicated whether the standard should remain, be modified, or removed.¹ We provide a summary of this analysis in Appendix G. Additional findings and recommendations are based upon data gathered through the stakeholder engagement process detailed on page 4 of this report.

Key Findings

Oregon's ESDs provide the regional infrastructure through which the state delivers special education, school improvement support, technology services, professional development, and dozens of other services that individual districts, particularly small and rural ones, cannot sustain independently. In many parts of Oregon, the ESD is not merely a useful resource; it is the only resource.

The OAESD's rule-by-rule analysis (see table C1 in Appendix C) confirms what stakeholders noted throughout the engagement process: Division 24 has not kept pace with how ESDs operate. It retains governance provisions eliminated by statute as far back as 2011, including the district boundary board function removed by HB 3298 and HB 2148, alongside reporting requirements replaced by SB 250 that were never updated in rule, and accountability frameworks that cannot meaningfully distinguish between standard, conditionally standard, and nonstandard ESD performance. The current reporting structure that organizes ESD accountability does not reflect what ESDs do and, by the assessment of its own rule owners, provides ODE with very little useful information.

The current structure also fails to define the purpose of ESDs in any actionable sense—a gap that undermines coherence in the state's improvement system, the efficiency of state investment, and the capacity of districts that depend on ESD services to serve their most vulnerable students.

There are five sub-recommendations for Division 24.

¹ Peterson, G. (2023, February). *An analysis of Division 24: Standards for education service districts* [Unpublished manuscript]. Oregon Association of Education Service Districts.



ORS 334.217 (Division 24) Recommendations

Recommended timeframes for completion of each of the Division 24 recommendations are provided in Table 16.

Recommendation 6. Remove Obsolete Provisions from Division 24

The first step in any revision of Division 24 is for ODE and the Legislature should formally remove provisions with no operational basis: the boundary board function eliminated in 2011 and 2013, the review of school district operations section inactive since 2008, and the 20-year audit retention requirement. Retaining obsolete provisions creates confusion, undermines credibility, and signals that rules are not taken seriously. Removing these provisions is the necessary precursor to a more expansive revision of Division 24 standards.

Moving forward after this initial step, as with Division 22, the revision of Division 24 standards should focus on identifying essential standards that are clear, measurable, enforceable, and compliant with current legislation. This would include the retention of current standards in the following core areas:

- **Governance and legal compliance.** ESDs must adhere to public meetings and records requirements, maintain required board policies, and apportion board zones following the decennial U.S. Census per ORS 334.032.
- **Superintendent licensure and board designation.** OAR 581-024-0240 should explicitly reference ORS 334.225, requiring the ESD superintendent to hold a valid administrative license and be designated as district clerk by the ESD board.
- **Financial transparency and audit compliance.** ESDs must maintain compliant budgets, submit audits on schedule, and demonstrate that at least 90 percent of state and local school funds are allocated to local service plan (LSP)-approved services—a threshold recommended for explicit codification. One hundred percent of School Improvement Fund resources must be tied to LSP-approved services.
- **LSP adoption and approval thresholds.** The LSP must be approved by at least two-thirds of component district boards representing at least 50 percent of total average daily membership—the primary mechanism through which component districts exercise governance authority.
- **Special education service obligations.** Division 24 should be updated to explicitly reference early childhood special education, early intervention, and schoolwide behavior and mental health services as components of the ESD’s special education scope, consistent with state and federal legal obligations.



- **Facility safety and emergency preparedness.** Requirements updated through HB 2574A (2017) and HB 3427 (2019) should be retained as binary compliance standards for ESD-operated programs and facilities.
- **Annual reporting.** Under SB 250 (2011), ESDs must submit an annual report by October 1 covering demographics, services, staff, distance learning use, and financial data. This obligation should be retained, with content and format updated and integrated into the broader accountability cycle described below.

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

Beyond what's determined as the essential minimums to maintain in Division 24, the primary accountability mechanism for ESDs should be fundamentally connected to their LSP transforming how stakeholders currently describe ESD Division 24 accountability as an unclear, burdensome compliance process and tying accountability to a rigorous, outcome-oriented instrument through which component districts co-design, approve, and evaluate the services they receive.

Division 24 should formally establish the LSP as the central organizing document for ESD planning, budgeting, and accountability. Each LSP should define services to be delivered; intended outcomes for student learning, educator capacity, and system effectiveness; performance measures and data sources; and a financial plan demonstrating resource alignment to approved services. LSPs should be explicitly connected to district accountability and improvement goals, including state and federal improvement designations, so that ESD service planning directly supports the improvement trajectories of component districts. This entrenches the LSP as a two-year performance agreement between the ESD and the districts it serves.

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 documents its response in the subsequent planning cycle.



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

The current annual approval cycle imposes significant administrative burden without proportionate accountability value. Division 24 should be revised to allow a biennial LSP aligned to Oregon's state budget cycle. A midpoint review in the second year would allow service adjustments without requiring full board reapproval unless material changes are involved. This shift requires targeted statutory changes to ORS 334.175 and corresponding administrative rules.

Following 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 and resource alignment; continuous improvement and evaluation; regional leadership and coordination; and governance, compliance, and operational integrity. This report would serve as a single, coherent, comparable submission. ODE's role should mirror the support orientation described throughout this document, using data to identify where ESDs need investment and technical assistance, calibrating oversight based on performance evidence, and reserving formal intervention for ESDs demonstrating sustained failure to serve their component districts. An example framework for ESD reporting is provided in Appendix H.

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

Stakeholders consistently noted that ODE frequently bypasses ESDs in delivering state initiatives, undermining the regional coherence ESDs are designed to provide. Division 24 should codify ODE's obligation to consult with and engage ESDs in planning and implementing statewide initiatives. It should also clearly define the respective roles of ESD regional support functions and ODE regional support teams, specifying where ESDs are the primary delivery mechanism, where ODE regional staff play a coordinating or technical assistance role, and how the two functions align to avoid duplication and gaps. Guidance and support delivered through a trusted regional partner is received differently and implemented more effectively than directives issued from the state level alone.

Key Collaborators

- Primary: OAESD and ESD superintendents
- Oregon State Board of Education
- School districts
- Oregon State Legislature

Implementation Considerations

- Clarify expectations for regional support functions of ESDs and clearly define how that aligns with ODE regional support teams
- Define measures of service quality and district capacity building
- Align LSPs with accountability and improvement goals
- Build flexibility for differing ESD sizes and contexts



Table 16. Summary of Division 22 and 24 recommendations and proposed timeline

Recommendation	Summary	Proposed timeline
Foundational Recommendation: Establish a formal standards review and governance process	ODE should develop and apply clear, evidence-based criteria to guide the addition, revision, consolidation, relocation, or removal of standards. These criteria should prioritize student outcomes and include evidence base, feasibility, measurability, implementation burden, and equity impact, and align with ODE's Student Success Priorities Framework.	Within 12 months of receipt of this report
Recommendation 1. Restructure Division 22 to retain only standards that connect directly to student outcomes	Division 22 should be restructured to retain only standards that are directly connected to student outcomes and can be measured in an explicit binary way (e.g., graduation requirements, educator licensure, safety and facility standards, special education).	Within 6 months of completion of the standards review using the newly developed governance process
Recommendation 2. Relocate Division 22 standards with less direct ties to student outcomes	Standards focused on educational quality, such as instructional leadership, curriculum, professional development, family engagement, and continuous improvement are poorly served by Division 22's compliance-oriented regulation. Rather than treating them as compliance checkboxes, they should be relocated into a separate regulatory school quality framework (see Recommendation 4).	Within 12 months of completion of the standards review process
Recommendation 3. Develop a regulatory school quality framework	ODE should develop a regulatory, continuous improvement framework for school quality aligned with Oregon's five student success priorities: (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. The framework should be monitored through an annual process led by local school boards, using a shared statewide rubric to assess district performance.	Within 12 months of completion of the standards review process
Recommendation 4. Reorient ODE's role toward differentiated support and improvement	ODE should shift from a compliance-driven, reactive, and punitive posture to one of a partner in improvement. When a district demonstrates lower-level performance, ODE's first response should be to offer resources, connect the district to ESD support, identify peer districts that have navigated similar challenges, and collaborate on an improvement plan.	Within 18 months after completion of the standards review process



Recommendation	Summary	Proposed timeline
Recommendation 5. Improve the system and public awareness of the Division 22 complaint process	ODE has developed an accessible system for parents and community members to submit notifications when schools or districts are not meeting standards, but it is not widely publicized. ODE should work closely with districts and parent/community-facing organizations to increase awareness of Division 22 standards and clearly outline the process for filing a complaint. Complaints should be directed to the local school board with a simultaneous copy to ODE.	Within 18 months after completion of the standards review process
Recommendation 6. Revise Division 24 to remove obsolete provisions from Division 24	Division 24 should be revised to remove obsolete provisions, keep only existing standards determined to be true minimum enforceable floors, and reposition the LSP as the essential monitoring and accountability metric for ESDs.	Within 12 months from receipt of this report
Recommendation 7. Establish local service plans as the accountability instrument for education service districts	Make the Local Service Plan (LSP) the central mechanism for ESD planning, budgeting, and accountability, connecting services and resources to measurable district and student outcomes. The LSP would function as a two-year performance agreement co-developed and approved by ESDs and their component districts.	Within 24 months from receipt of this report
Recommendation 8. Require component districts to evaluate education service district performance	Strengthen ESD accountability by requiring component districts to formally evaluate the quality, responsiveness, effectiveness, and capacity-building impact of ESD services. These evaluations would inform subsequent LSP cycles and ensure accountability is grounded in the experiences and needs of the districts ESDs serve.	Within 24 months from receipt of this report
Recommendation 9. Establish a biennial local service plan approval cycle with opportunity for midcycle adjustments	Align LSPs with Oregon's two-year budget cycle and replace annual approval with a biennial process that allows midcycle adjustments. At the end of each cycle, ESDs would provide ODE with a consolidated performance report focused on outcomes, partnerships, resource alignment, continuous improvement, regional leadership, and operational integrity.	Within 24 months from receipt of this report
Recommendation 10. Codify the roles of the Oregon Department of Education and education service districts	Clearly define and align the respective roles of ODE, ESDs, and regional support teams in implementing statewide initiatives. This would strengthen ESDs' role as regional implementation partners while reducing duplication, gaps, and inconsistent delivery of support to districts.	Within 24 months from receipt of this report

Source: NWCC analysis of findings.



Conclusion. A Coherent Framework for Oregon's Education System

The recommendations presented in this report represent a coherent framework for revision, rather than an isolated or piecemeal approach. 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 between 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 end. 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 system that ensures all students have access to the opportunities and conditions necessary for success.



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Appendix A. Division 22 and 24 Standards



Division 22

The following outlines the rule number and title across the five priorities for student success in Division 22.

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 Bequests



Appendix B. Interview and Focus Group Protocols and Participants



Division 22 Interview and Focus Group Protocol

Below is the introduction each interviewer used as an overview of the project, along with the questions asked:

Thank you for taking the time to meet with us today. My name is [insert name], and I work at Education Northwest, based in Portland. Education Northwest is federally funded through the Comprehensive Center Program to provide support to the Oregon Department of Education. In collaboration with ODE, we've identified the revision of the Division 22 and Division 24 standards as a key area where we can assist. As a gentle reminder, the Division 22 standards outline the criteria that districts must meet to demonstrate that they are providing a standard level of services and education. They include requirements for curriculum, graduation requirements, and special education services, etc. The Division 24 standards outline the operational, administrative, and programmatic standards for education service districts (ESDs). Our first step is gathering insights from key stakeholders to ensure any review or revision focuses on the most essential elements. We would love to know more about your experiences and perspectives on the Division 22 standards:

1. From your perspective, which Division 22 standards do you want to preserve and keep as standards/rules? For example, which standards help you understand the quality of a school or district?
 - a. Which ones are important but could be transformed into "best practices" for districts?
 - b. What are standards or rules (maybe ones that are currently district requirements) could be elevated to a Division 22 standard?
2. In their current state, do you feel like Division 22 rules offer too much guidance, the right amount of guidance, or not enough guidance? Why?
3. Walk me through how Division 22 standards have been upheld in your experience. Who is involved? What works well in ensuring they are upheld? What are common barriers? How would you improve the process?
4. In an ideal world, what role should the state play in ensuring Division 22 rules are upheld? The district? Schools? Parents/Parent groups?

Division 24 Interview and Focus Group Protocol

1. What do you know about the Division 24 standards for ESDs?
 - a. If their answer indicates knowledge of the standards proceed to questions below. If their answer indicates no knowledge of the standards proceed to Question B-C.
 - i. Do you think the Division 24 standards require revisions? If so, please specify how they should be updated (i.e., to improve clarity, enforcement, implementation, alignment to district need). (priority)
 - ii. Do you think the standards reflect the current role ESDs play within the educational landscape in Oregon? Explain. (priority)



- iii. Should reporting requirements outlined in SB 250 and ORS be more fully aligned and updated to better capture ESD actions, impacts, as well as partner district feedback?
 - b. What do you think should be required of ESDs?
 - i. Probes: Planning, requirements for services, financially, reporting.
 - c. Are you aware of things an ESD should be doing that they're not?
- 2. (for ESD representative only) Are there Division 24 standards that you feel are superfluous?
Are there standards that limit your ability to support districts?

Interview and Focus Group Participants

Below is a list of the organizations that participated in interviews and focus groups for both Division 22 and 24 standards. Participants were asked the specific questions depending on their proximity and familiarity with both sets of standards.

- Office of Indian Education
- Youth Advisory Council (YAC)
- Small and Rural School Support team
- Division 22 committee members (i.e., rule owners)
- State Library of Oregon
- Teacher Standards and Practices Commission (TSPC)
- Oregon Health Authority (OHA)
- Higher Education Coordinating Commission (HECC)
- Department of Early Learning and Care (DELIC)
- Oregon School Boards Association (OSBA)
- Coalition of Oregon School Administrators (COSA)
- Oregon Association of Education Service Districts (OAESD)
- Oregon Education Association (OEA)
- Oregon Association of School Business Officials (OASBO)
- FACT Oregon
- Stand for Children
- Foundations for a Better Oregon (FBO)
- Oregon Coalition of Community Charter Schools
- Oregon School Nurses Association
- Alcohol and Drug Policy Commission
- Oregon Association for Talented and Gifted (OATAG)
- Oregon Parent Teacher Association (families, PTA staff members, and PTA board members)



Appendix C. Rule Owner Survey

Rule Owner Survey Questions

Below is a list of the survey questions that were programmed into Alchemer and sent to rule owners within the Oregon Department of Education:

1. Which OAR (Division 22 rule) are you completing this survey for?
2. Briefly describe the purpose or intent of this rule as you understand it.
3. Who is responsible for monitoring compliance with this rule? (Example responses may include: my team/unit; another team/unit; shared responsibility)
4. Is there guidance from ODE on effective implementation of this rule? If you selected “Somewhat” or “No,” what guidance is missing or needed?
5. Is compliance enforced or monitored through mechanisms outside Division 22? If yes, please describe the mechanism and the responsible entity/department. If no or unsure: could it be? If yes, which entity/department would be appropriate?
6. What supports does ODE currently provide to help districts meet this rule? (Examples: guidance documents, office hours, technical assistance, trainings, monitoring tools.)
7. How effective are the current supports? Please explain your rating.
8. What changes, improvements, or new supports are needed?
9. To what extent does this rule impact student success or align with Oregon’s performance growth targets? Please explain your rating.
10. How should this rule relate to new or emerging accountability measures?
11. What role do you believe the field (districts, schools, community as a whole) wants ODE to play in relation to this rule?
12. Are there any revisions you believe are needed for this rule? If so, what and why? Revisions may be for clarity, enforceability, or due to recently passed legislation.
13. Anything else you would like to add?



Appendix D. Rule-by-Rule Analysis of ORS 327.103 (Division 22)

Table D1. Rule-by-rule analysis of ORS 327.103 (Division 22)

Rule number and title	Outcome agreement	Measurement agreement
581-022-2000 Diploma Requirements	3 = Directly impacts student outcomes	3 = Easily measured
581-022-2005 Veterans Diploma	3 = Directly impacts student outcomes	3 = Easily measured
581-022-2010 Modified Diploma	3 = Directly impacts student outcomes	3 = Easily measured
581-022-2015 Extended Diploma	3 = Directly impacts student outcomes	3 = Easily measured
581-022-2020 Certificate of Attendance	3 = Directly impacts student outcomes	3 = Easily measured
581-022-2025 Credit Options	3 = Directly impacts student outcomes	3 = Easily measured
581-022-2030 District Curriculum	3 = Directly impacts student outcomes	3 = Easily measured
581-022-2045 Substance Use Prevention and Intervention Plan	3 = Directly impacts student outcomes	3 = Easily measured
581-022-2050 Human Sexuality Education	3 = Directly impacts student outcomes	3 = Easily measured
581-022-2055 Career Education	3 = Directly impacts student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2060 Comprehensive School Counseling	3 = Directly impacts student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2100 Administration of State Assessments	2 = Moderate impacts student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2110 Exception of Students with Disabilities from State Assessments	2 = Moderate impacts student outcomes	3 = Easily measured
581-022-2115 Assessment of Essential Skills	2 = Moderate impacts student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2120 Essential Skill Assessments for English Language Learners	3 = Directly impacts student outcomes	3 = Easily measured
581-022-2130 Community Informed Information Gathering Process at Kindergarten	2 = Moderate impacts student outcomes	2 = Measurement may be ambiguous or difficult



Rule number and title	Outcome agreement	Measurement agreement
581-022-2205 Policies on Reporting of Child Abuse	2 = Moderate impacts student outcomes	3 = Easily measured
581-022-2210 Anabolic Steroids and Performance Enhancing Substances	1 = Does not impact student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2215 Safety of School Sports–Concussions	3 = Directly impacts student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2220 Health Services	3 = Directly impacts student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2223 Healthy and Safe Schools Plan	2 = Moderate impacts student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2225 Emergency Plans and Safety Programs	2 = Moderate impacts student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2230 Asbestos Management Plans	2 = Moderate impacts student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2250 District Improvement Plan	1 = Does not impact student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2255 School and District Performance Report Criteria	2 = Moderate impacts student outcomes	3 = Easily measured
581-022-2260 Records and Reports	1 = Does not impact student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2263 Physical Education Requirements	3 = Directly impacts student outcomes	3 = Easily measured
581-022-2265 Report on PE Data	1 = Does not impact student outcomes	3 = Easily measured
581-022-2267 Annual Report on Restraint and Seclusion	3 = Directly impacts student outcomes	3 = Easily measured
581-022-2270 Individual Student Assessment, Recordkeeping and Reporting	3 = Directly impacts student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2300 Standardization	1 = Does not impact student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2305 District Assurances of Compliance with Public School Standards	1 = Does not impact student outcomes	3 = Easily measured
581-022-2307 Educational Equity Advisory Committees	2 = Moderate impacts student outcomes	2 = Measurement may be ambiguous or difficult



Rule number and title	Outcome agreement	Measurement agreement
581-022-2308 Agreements Entered Into with Voluntary Organizations	2 = Moderate impacts student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2310 Equal Education Opportunities	2 = Moderate impacts student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2312 Every Student Belongs	3 = Directly impacts student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2315 Special Education for Children with Disabilities	3 = Directly impacts student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2320 Required Instructional Time	3 = Directly impacts student outcomes	3 = Easily measured
581-022-2325 Identification of Academically Talented and Intellectually Gifted Students	2 = Moderate impacts student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2330 Rights of Parents of TAG Students	2 = Moderate impacts student outcomes	3 = Easily measured
581-022-2335 Daily Class Size	3=Directly impacts student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2340 Media Programs	3 = Directly impacts student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2345 Auxiliary Services	2 = Moderate impacts student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2350 Independent Adoptions of Instructional Materials	3 = Directly impacts student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2355 Instructional Materials Adoption	3 = Directly impacts student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2360 Postponement of Purchase of State-Adopted Instructional Materials	2 = Moderate impacts student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2370 Complaint Procedure	1 = Does not impact student outcomes	3 = Easily measured
581-022-2400 Personnel	3 = Directly impacts student outcomes	3 = Easily measured
581-022-2405 Personnel Policies	1 = Does not impact student outcomes	3 = Easily measured
581-022-2410 Teacher and Administrator Evaluation and Support	3 = Directly impacts student outcomes	2 = Measurement may be ambiguous or difficult



Rule number and title	Outcome agreement	Measurement agreement
581-022-2415 Core Teaching Standards	3 = Directly impacts student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2420 Educational Leadership - Administrator Standards	2 = Moderate impacts student outcomes	2 = Measurement may be ambiguous or difficult
581-022-2430 Fingerprinting of Subject Individuals in Positions Not Requiring Licensure as Teachers, Administrators, Personnel Specialists, School Nurses	2 = Moderate impacts student outcomes	3 = Easily measured
581-022-2440 Teacher Training Related to Dyslexia	3 = Directly impacts student outcomes	3 = Easily measured
581-022-2445 Universal Screenings for Risk Factors of Dyslexia	3 = Directly impacts student outcomes	3 = Easily measured
581-022-2500 Programs and Services for TAG Students	2 = Moderate impacts student outcomes	3 = Easily measured
581-022-2505 Alternative Education Programs	2 = Moderate impacts student outcomes	3 = Easily measured
581-022-2510 Suicide Prevention Plan	3 = Directly impacts student outcomes	3=Easily measured
581-022-2515 Menstrual Dignity for Students	2 = Moderate impacts student outcomes	3=Easily measured



Appendix E. Division 22 Standard Analysis Summary Table

The following table provides a summary of the findings from the standards analysis and state comparison. This table is not meant to indicate any final determination; rather it can be used as a jumping off point for the Oregon Department of Education (ODE) and other educational leaders and partners to track whether a specific standard meets the criteria for keeping, removing, or modifying for the future. We recommend that ODE consider evaluating each standard on student outcomes, evidence of effectiveness, measurability, implementation feasibility, equity, and administrative burden. The current analysis primarily focuses on student outcomes and measurability as well as whether they are typically included as standards compared to other states.

Standards that could be kept with high confidence are ones that directly impacts student outcomes, is easily measured, is shared by all five comparison states, and has similar requirements as other states. However, ODE and their partners should determine 1) the criteria by which they want to assess each standard beyond this current analysis, which could differ from these criteria, 2) the type of analysis best suited to give them an indication of whether the standard meets that criteria, which could include other ways of assessing whether the criteria are met than what is presented in the table, and 3) how to determine whether results of the analysis indicates a standard should be kept, modified, or removed, which could include other thresholds of what moves a standard into the categories of keep, modify, or remove.

The table identifies:

- Thirty standards that can be kept:
 - Two standards that Oregon can keep with confidence with current analysis
 - Fifteen standards that Oregon can keep but may want to revise based on what other states are doing
 - Thirteen standards that Oregon can keep but may want to adjust based on how the standard is currently measured
- Twenty-nine standards that need further analysis for a final determination



Table E1. Summary of findings from standards analysis and state comparison

Priority for student success	Oregon rule number and title	Standard analysis: Impact on student outcomes	Standard analysis: Ease of measurement	State analysis: Number of states with comparable rule	State analysis: Number of states with similar requirements	Potential action for ODE
Aligned and Focused Educational Systems	581-022-2025 Credit Options	Directly impacts student outcomes	Easily measured	3	1	Keep, revision optional
Aligned and Focused Educational Systems	581-022-2030 District Curriculum	Directly impacts student outcomes	Easily measured	5	2	Keep, revision optional
Aligned and Focused Educational Systems	581-022-2060 Comprehensive School Counseling	Directly impacts student outcomes	Measurement may be ambiguous or difficult	4	2	Keep, modify measurement
Aligned and Focused Educational Systems	581-022-2100 Administration of State Assessments	Moderate impacts student outcomes	Measurement may be ambiguous or difficult	4	3	Further analysis needed
Aligned and Focused Educational Systems	581-022-2110 Exception of Students with Disabilities from State Assessments	Moderate impacts student outcomes	Easily measured	1	0	Further analysis needed
Aligned and Focused Educational Systems	581-022-2115 Assessment of Essential Skills	Moderate impacts student outcomes	Measurement may be ambiguous or difficult	3	1	Further analysis needed
Aligned and Focused Educational Systems	581-022-2120 Essential Skill Assessments for English Language Learners	Directly impacts student outcomes	Easily measured	2	0	Keep, revision optional



Priority for student success	Oregon rule number and title	Standard analysis: Impact on student outcomes	Standard analysis: Ease of measurement	State analysis: Number of states with comparable rule	State analysis: Number of states with similar requirements	Potential action for ODE
Aligned and Focused Educational Systems	581-022-2130 Community Informed Information Gathering Process at Kindergarten	Moderate impacts student outcomes	Measurement may be ambiguous or difficult	2	0	Further analysis needed
Aligned and Focused Educational Systems	581-022-2250 District Improvement Plan	Does not impact student outcomes	Measurement may be ambiguous or difficult	5	3	Further analysis needed
Aligned and Focused Educational Systems	581-022-2260 Records and Reports	Does not impact student outcomes	Measurement may be ambiguous or difficult	5	3	Further analysis needed
Aligned and Focused Educational Systems	581-022-2265 Report on PE Data	Does not impact student outcomes	Easily measured	2	1	Further analysis needed
Aligned and Focused Educational Systems	581-022-2300 Standardization	Does not impact student outcomes	Measurement may be ambiguous or difficult	3	1	Further analysis needed
Aligned and Focused Educational Systems	581-022-2305 District Assurances of Compliance with Public School Standards	Does not impact student outcomes	Easily measured	2	0	Further analysis needed
Aligned and Focused Educational Systems	581-022-2315 Special Education for Children with Disabilities	Directly impacts student outcomes	Measurement may be ambiguous or difficult	5	5	Keep, modify measurement



Priority for student success	Oregon rule number and title	Standard analysis: Impact on student outcomes	Standard analysis: Ease of measurement	State analysis: Number of states with comparable rule	State analysis: Number of states with similar requirements	Potential action for ODE
Aligned and Focused Educational Systems	581-022-2320 Required Instructional Time	Directly impacts student outcomes	Easily measured	5	5	Keep, with confidence
Aligned and Focused Educational Systems	581-022-2325 Identification of Academically Talented and Intellectually Gifted Students	No agreement	Measurement may be ambiguous or difficult	3	2	Further analysis needed
Aligned and Focused Educational Systems	581-022-2335 Daily Class Size	Directly impacts student outcomes	Measurement may be ambiguous or difficult	2	0	Keep, modify measurement
Aligned and Focused Educational Systems	581-022-2400 Personnel	Directly impacts student outcomes	Easily measured	5	5	Keep, with confidence
Aligned and Focused Educational Systems	581-022-2445 Universal Screenings for Risk Factors of Dyslexia	Directly impacts student outcomes	Easily measured	5	4	Keep, revision optional
Committed and Supportive Staff	581-022-2405 Personnel Policies	Does not impact student outcomes	Easily measured	3	0	Further analysis needed
Committed and Supportive Staff	581-022-2410 Teacher and Administrator Evaluation and Support	Directly impacts student outcomes	Measurement may be ambiguous or difficult	5	3	Keep, modify measurement
Committed and Supportive Staff	581-022-2415 Core Teaching Standards	Directly impacts student outcomes	Measurement may be ambiguous or difficult	5	3	Keep, modify measurement



Priority for student success	Oregon rule number and title	Standard analysis: Impact on student outcomes	Standard analysis: Ease of measurement	State analysis: Number of states with comparable rule	State analysis: Number of states with similar requirements	Potential action for ODE
Committed and Supportive Staff	581-022-2420 Educational Leadership - Administrator Standards	Moderate impacts student outcomes	Measurement may be ambiguous or difficult	5	3	Further analysis needed
Engaged Partners and Communities	581-022-2005 Veterans Diploma	Directly impacts student outcomes	Easily measured	5	1	Keep, revision optional
Engaged Partners and Communities	581-022-2255 School and District Performance Report Criteria	Moderate impacts student outcomes	Easily measured	4	3	Further analysis needed
Engaged Partners and Communities	581-022-2270 Individual Student Assessment, Recordkeeping and Reporting	Directly impacts student outcomes	Measurement may be ambiguous or difficult	5	1	Keep, modify measurement
Engaged Partners and Communities	581-022-2307 Educational Equity Advisory Committees	Moderate impacts student outcomes	Measurement may be ambiguous or difficult	0	0	Further analysis needed
Engaged Partners and Communities	581-022-2330 Rights of Parents of TAG Students	Moderate impacts student outcomes	Easily measured	0	0	Further analysis needed
Engaged Partners and Communities	581-022-2370 Complaint Procedures	Does not impact student outcomes	Easily measured	2	1	Further analysis needed



Priority for student success	Oregon rule number and title	Standard analysis: Impact on student outcomes	Standard analysis: Ease of measurement	State analysis: Number of states with comparable rule	State analysis: Number of states with similar requirements	Potential action for ODE
High-Quality Learning Experiences for All Students	581-022-2000 Diploma Requirements	Directly impacts student outcomes	Easily measured	5	3	Keep, revision optional
High-Quality Learning Experiences for All Students	581-022-2010 Modified Diploma	Directly impacts student outcomes	Easily measured	4	1	Keep, revision optional
High-Quality Learning Experiences for All Students	581-022-2015 Extended Diploma	Directly impacts student outcomes	Easily measured	1	0	Keep, revision optional
High-Quality Learning Experiences for All Students	581-022-2020 Certificate of Attendance	Directly impacts student outcomes	Easily measured	3	3	Keep, revision optional
High-Quality Learning Experiences for All Students	581-022-2050 Human Sexuality Education	Directly impacts student outcomes	Easily measured	5	2	Keep, revision optional
High-Quality Learning Experiences for All Students	581-022-2055 Career Education	Directly impacts student outcomes	Measurement may be ambiguous or difficult	4	2	Keep, modify measurement
High-Quality Learning Experiences for All Students	581-022-2263 Physical Education Requirements	Directly impacts student outcomes	Easily measured	5	1	Keep, revision optional
High-Quality Learning Experiences for All Students	581-022-2340 Media Programs	Directly impacts student outcomes	Measurement may be ambiguous or difficult	5	3	Keep, modify measurement



Priority for student success	Oregon rule number and title	Standard analysis: Impact on student outcomes	Standard analysis: Ease of measurement	State analysis: Number of states with comparable rule	State analysis: Number of states with similar requirements	Potential action for ODE
High-Quality Learning Experiences for All Students	581-022-2350 Independent Adoptions of Instructional Materials	Directly impacts student outcomes	Measurement may be ambiguous or difficult	2	1	Keep, modify measurement
High-Quality Learning Experiences for All Students	581-022-2355 Instructional Materials Adoption	Directly impacts student outcomes	Measurement may be ambiguous or difficult	4	1	Keep, modify measurement
High-Quality Learning Experiences for All Students	581-022-2360 Postponement of Purchase of State-Adopted Instructional Materials	No agreement	Measurement may be ambiguous or difficult	0	0	Further analysis needed
High-Quality Learning Experiences for All Students	581-022-2440 Teacher Training Related to Dyslexia	Directly impacts student outcomes	Easily measured	4	0	Keep, revision optional
High-Quality Learning Experiences for All Students	581-022-2500 Programs and Services for TAG Students	No agreement	Easily measured	3	2	Further analysis needed
High-Quality Learning Experiences for All Students	581-022-2505 Alternative Education Programs	Moderate impacts student outcomes	Easily measured	4	2	Further analysis needed
Safe & Inclusive Schools	581-022-2045 Substance Use Prevention and Intervention Plan	Directly impacts student outcomes	Easily measured	2	1	Keep, revision optional



Priority for student success	Oregon rule number and title	Standard analysis: Impact on student outcomes	Standard analysis: Ease of measurement	State analysis: Number of states with comparable rule	State analysis: Number of states with similar requirements	Potential action for ODE
Safe & Inclusive Schools	581-022-2205 Policies on Reporting of Child Abuse	Moderate impacts student outcomes	Easily measured	3	0	Further analysis needed
Safe & Inclusive Schools	581-022-2210 Anabolic Steroids and Performance Enhancing Substances	Does not impact student outcomes	Measurement may be ambiguous or difficult	1	0	Further analysis needed
Safe & Inclusive Schools	581-022-2215 Safety of School Sports– Concussions	Directly impacts student outcomes	Measurement may be ambiguous or difficult	5	5	Keep, modify measurement
Safe & Inclusive Schools	581-022-2220 Health Services	Directly impacts student outcomes	Measurement may be ambiguous or difficult	4	2	Keep, modify measurement
Safe & Inclusive Schools	581-022-2223 Healthy and Safe Schools Plan	Moderate impacts student outcomes	Measurement may be ambiguous or difficult	1	0	Further analysis needed
Safe & Inclusive Schools	581-022-2225 Emergency Plans and Safety Programs	Moderate impacts student outcomes	Measurement may be ambiguous or difficult	5	3	Further analysis needed
Safe & Inclusive Schools	581-022-2230 Asbestos Management Plans	Moderate impacts student outcomes	Measurement may be ambiguous or difficult	0	0	Further analysis needed



Priority for student success	Oregon rule number and title	Standard analysis: Impact on student outcomes	Standard analysis: Ease of measurement	State analysis: Number of states with comparable rule	State analysis: Number of states with similar requirements	Potential action for ODE
Safe & Inclusive Schools	581-022-2267 Annual Report on Restraint and Seclusion	Directly impacts student outcomes	Easily measured	4	3	Keep, revision optional
Safe & Inclusive Schools	581-022-2308 Agreements Entered Into with Voluntary Organizations	Moderate impacts student outcomes	Measurement may be ambiguous or difficult	0	0	Further analysis needed
Safe & Inclusive Schools	581-022-2310 Equal Education Opportunities	Moderate impacts student outcomes	Measurement may be ambiguous or difficult	5	4	Further analysis needed
Safe & Inclusive Schools	581-022-2312 Every Student Belongs	Directly impacts student outcomes	Measurement may be ambiguous or difficult	0	0	Keep, modify measurement
Safe & Inclusive Schools	581-022-2345 Auxiliary Services	Moderate impacts student outcomes	Measurement may be ambiguous or difficult	5	1	Further analysis needed
Safe & Inclusive Schools	581-022-2430 Fingerprinting of Subject Individuals in Positions Not Requiring Licensure as Teachers, Administrators, Personnel Specialists, School Nurses	Moderate impacts student outcomes	Easily measured	5	4	Further analysis needed



Priority for student success	Oregon rule number and title	Standard analysis: Impact on student outcomes	Standard analysis: Ease of measurement	State analysis: Number of states with comparable rule	State analysis: Number of states with similar requirements	Potential action for ODE
Safe & Inclusive Schools	581-022-2510 Suicide Prevention Plan	Directly impacts student outcomes	Easily measured	5	2	Keep, revision optional
Safe & Inclusive Schools	581-022-2515 Menstrual Dignity for Students	Moderate impacts student outcomes	Easily measured	3	3	Further analysis needed

Source: Compiled from analysis conducted in this report Note: Highlighted boxes indicate high confidence for keeping for each individual analysis (i.e., directly impacts student outcomes, is easily measured, is shared by all five comparison states, and has similar requirements as other states)



Appendix F. Example School Quality Domains Components, Measurable Indicators, and Rubric



School Quality Domain Core Components and Measurable Indicators

The following framework identifies the core components and measurable indicators for each of Oregon's five priorities for student success, used in the annual district report to the local board of education. The rubric that follows provides a consistent, shared instrument for board-level scoring of district performance across these priorities. Together, these tools form the foundation of the accountability cycle described in this report.

Part One. Core Components and Measurable Indicators

Priority 1. High-Quality Learning Experiences for All Students

Core Components

- Rigorous, culturally responsive instruction aligned to state standards
- Systematic use of student data to guide instructional decisions
- Student voice and agency integrated into learning
- High expectations for all students, regardless of starting point
- College and career readiness preparation

Measurable Indicators

Student Achievement and Growth

- State assessment proficiency and growth percentiles
- District benchmark assessment results
- Assessment gains disaggregated by student group

Attendance and On-Track Status

- Daily attendance and chronic absenteeism rates
- End-of-ninth-grade on-track status (credits earned, promotion rate)
- High school graduation rates (4-year, 5-year, extended diploma)

College and Career Readiness

- SAT/ACT scores; AP/IB participation and pass rates
- Career technical education completion rates
- FAFSA completion rates
- Student empowerment surveys: preparedness for life beyond school

Instructional Quality

- Observation rubric scores and classroom walkthrough data
- Frequency of data cycles and evidence of instructional adjustments



- Student engagement levels and classroom climate ratings
- Student work samples and grade-level performance data

Priority 2. Aligned and Focused Educational Systems

Core Components

- Coherent alignment of curriculum, instruction, and assessment to state standards
- Data-driven decision-making at all levels
- Intentional, evidence-based school improvement planning
- Strong alignment across pre-K and postsecondary education
- Meaningful collaboration with Tribal partners

Measurable Indicators

Curriculum & Instructional Alignment

- Curriculum audit results and adoption documentation
- Alignment of instructional frameworks to state standards
- Walkthrough data reflecting standards-aligned instruction

Data Systems & Decision-Making

- Multiple forms of data used to drive decision-making
- Data system usage and meeting frequency documentation
- Evidence of instructional adjustments based on data cycles

Improvement Planning

- Existence and implementation of evidence-based improvement plans
- Resource allocation aligned to identified student needs
- Progress toward measurable improvement goals

Systems Alignment

- Articulation agreements and transition protocols across pre-K and postsecondary
- Tribal partnership consultation frequency and joint programming
- State and regional partnership agreements and collaborative initiatives

Priority 3. Engaged Partners and Communities

Core Components

- Genuine family partnership in the educational enterprise
- Broad community and stakeholder engagement
- Student experiences centered through Student Success Plans
- Two-way, multilingual, culturally responsive communication



- Community organizations and civic institutions contributing to student success

Measurable Indicators

Family Engagement

- Family participation rates at conferences, events, workshops, and school activities
- Two-way communication frequency (messages, calls, conferences, digital platforms)
- Family survey data: trust in school, communication quality, engagement satisfaction
- Representation in decision-making through advisory councils and governance participation
- Home-school learning alignment (literacy nights, homework support participation)
- Volunteerism data: volunteer hours and school involvement

Student Success Plans

- Plan completion rates
- Frequency of consultation and use in instructional planning
- Student survey data on whether their experiences feel centered

Community Engagement

- Number and quality of active community partnerships
- Community input session frequency and participation
- Joint programming with community organizations
- Stakeholder survey results on engagement quality and intentionality

Priority 4. Safe and Inclusive Schools

Core Components

- Safe, inclusive, and supportive environment for all students and staff
- Strong shared vision and norms understood by all
- Equitable, restorative discipline practices
- Student mental health needs met in accordance with Oregon’s Integrated Model
- Equity and cultural responsiveness embedded in school practices

Measurable Indicators

Climate & Safety

- Student survey: “I feel safe at school”
- Student, staff, and family climate survey results
- Sense of belonging, trust, and physical and psychological safety measures

Belonging & Inclusion

- Student survey: belonging and connection measures



- Equity and cultural responsiveness indicators
- Discipline incident rates disaggregated by student group
- Restorative practice implementation and outcomes (days of instruction restored, restorative conferences held)

Mental Health & Well-Being

- Implementation of Oregon's Integrated Model of Mental Health
- Counselor-to-student ratios
- Student access to mental health supports and services
- Student well-being survey data

Attendance & Engagement

- Chronic absenteeism rates disaggregated by student group
- Academic persistence indicators
- Engagement survey data

Priority 5. Committed and Supported Staff

Core Components

- Staff feel supported and valued beginning with recruitment
- Consistent job-embedded professional learning and coaching
- Shared leadership and collegial decision-making
- Leaders set measurable goals and provide pathways to reach them
- State and regional partnerships creating inclusive working conditions

Measurable Indicators

Staff Support & Well-Being

- Staff survey: satisfaction, support, and sense of value
- Recruitment process satisfaction surveys
- Retention rates post-first year
- Organizational health measures: trust, communication, and engagement

Professional Learning & Coaching

- Professional development hours and participation rates
- Job-embedded PLC participation and collaborative planning time
- Coaching frequency and quality
- Alignment of PD to school improvement goals and evidence of classroom implementation



Leadership & Shared Decision-Making

- Leadership goal documentation and progress monitoring
- Professional growth plan existence and quality
- Teacher involvement in leadership teams and committee participation
- Staff survey: perceived clarity of goals and pathways to reach them

Retention & Stability

- Year-over-year teacher retention rates
- Staff turnover rates by role
- Years of experience distribution
- Mentorship program participation

Partnerships

- State and regional partnership agreements
- Collaborative initiatives between Pre-K–12, higher education, and workforce

Part Two. Example School Quality Rubric

The example rubric below serves two purposes: it provides local school boards with a consistent instrument for reviewing annual school quality reports submitted by districts, and it serves as a self-assessment tool for districts' continuous improvement efforts. Organized around Oregon's five priorities for student success, each indicator is scored on a four-level scale—from Beginning to Exemplary—creating a common language for discussing school quality statewide.

Performance Levels:

- 4 – Exemplary (Systemic, consistent, high impact) 2 – Developing (Inconsistent, emerging)
3 – Proficient (Consistent, effective) 1 – Beginning (Limited or absent)

Priority 1. High-Quality Learning Experiences for All Students

Indicator	1 – Beginning	2 – Developing	3 – Proficient	4 – Exemplary
Instructional Quality	Ineffective or inconsistent instruction	Basic instructional practices evident	Strong, standards-aligned instruction	Highly effective, differentiated, innovative instruction
Student Achievement & Growth	Limited or negative growth	Inconsistent growth across groups	Consistent growth for most students	Accelerated growth for all, including historically underserved groups
Attendance & On-Track Status	High absenteeism; most students off-track	Moderate absenteeism; mixed on-track rates	Most students attend regularly and are on track	High attendance; students on track across all groups



Indicator	1 – Beginning	2 – Developing	3 – Proficient	4 – Exemplary
Use of Data to Inform Instruction	Data rarely used	Data used occasionally	Data informs instruction and interventions	Continuous data cycles drive real-time adjustments
College & Career Readiness	Little evidence of readiness preparation	Some CTE or readiness programming	Most students engaged in readiness pathways	All students have individualized pathways; strong outcomes
Student Voice & Agency	Students have no role in learning	Limited opportunities for student input	Students regularly contribute to learning	Students co-design learning; strong sense of agency

Priority 2. Aligned and Focused Educational Systems

Indicator	1 – Beginning	2 – Developing	3 – Proficient	4 – Exemplary
Curriculum Alignment	No clear alignment to state standards	Partial alignment; inconsistent implementation	Curriculum aligned and consistently implemented	Fully aligned; regularly audited and updated
Data-Driven Decision-Making	Data rarely informs decisions	Some data used; not systematic	Multiple data sources regularly inform decisions	Comprehensive data systems drive all levels of decision-making
Improvement Planning	No formal improvement plan	Plan exists but not consistently implemented	Evidence-based plan implemented with fidelity	Adaptive improvement system with measurable outcomes
Pre-K–Postsecondary Alignment	No articulation across levels	Limited coordination	Transition protocols in place	Seamless alignment across all levels with strong outcomes
Tribal Partnership Collaboration	No consultation or collaboration	Occasional engagement	Regular, meaningful collaboration	Deep, ongoing partnership integrated into systems and practices



Priority 3. Engaged Partners and Communities

Indicator	1 – Beginning	2 – Developing	3 – Proficient	4 – Exemplary
Family Participation	Low turnout; one-way communication	Occasional events; limited participation	Regular participation; improving attendance	High participation; families are active partners
Family Voice & Partnership	Families not involved in decisions	Limited input opportunities	Families provide input through surveys and committees	Families co-lead, co-design, and influence decisions
Communication Quality	Infrequent, one-way communication	Basic communication, not consistent	Regular two-way communication systems	Responsive, personalized, culturally responsive communication
Student Success Plan Use	Plans not completed or used	Plans exist but rarely consulted	Plans completed and regularly consulted	Plans drive individualized learning; students feel centered
Community Engagement	No community engagement strategy	Occasional community involvement	Intentional community engagement processes	Community co-leads initiatives; strong reciprocal partnerships

Priority 4. Safe and Inclusive Schools

Indicator	1 – Beginning	2 – Developing	3 – Proficient	4 – Exemplary
School Climate (Safety & Trust)	Negative or unsafe climate; low trust	Mixed perceptions; pockets of positive climate	Generally positive; most feel safe and respected	Strong, inclusive climate; high trust across all groups
Sense of Belonging	Few students feel they belong	Some students feel connected	Most students report sense of belonging	All students feel valued; belonging embedded in culture
Mental Health Support	No coordinated mental health support	Limited services; not integrated	Mental health supports aligned to Oregon's Integrated Model	Comprehensive, proactive mental health system with strong outcomes



Indicator	1 – Beginning	2 – Developing	3 – Proficient	4 – Exemplary
Discipline Equity	High rates; significant disparities by group	Moderate rates; some disparities	Low rates; limited disparities	Restorative practices; equitable outcomes across all groups
Cultural Responsiveness	Little evidence of culturally responsive practice	Emerging efforts; inconsistent	Culturally responsive practices evident school-wide	Culture of equity; student identities affirmed throughout

Priority 5. Committed and Supported Staff

Indicator	1 – Beginning	2 – Developing	3 – Proficient	4 – Exemplary
Staff Support & Well-Being	Low morale; staff feel unsupported	Mixed morale; inconsistent support	Generally positive morale; staff feel supported	High trust; staff feel deeply valued from recruitment onward
Professional Learning & Coaching	PD unstructured or minimal	Some PD provided; not consistently applied	Aligned PD with evidence of classroom implementation	Embedded, job-embedded learning culture; staff lead and innovate
Shared Leadership & Voice	Leadership centralized; no staff input	Limited delegation or input opportunities	Distributed leadership structures in place	Collective leadership; staff and families share responsibility
Leadership Goal-Setting & Support	No clear goals or growth pathways	Goals exist but not consistently communicated	Clear goals with defined support pathways	Measurable goals; individualized pathways; strong follow-through
Teacher Retention & Stability	High turnover; unstable workforce	Moderate turnover; some stability	Stable staff with manageable turnover	High retention; strong pipeline; experienced, committed workforce
State & Regional Partnerships	No external partnerships	Limited or inactive partnerships	Active partnerships with higher education and workforce	Deep, integrated partnerships creating inclusive conditions for all staff



Appendix G. Oregon Association of Education Service Districts Division 24 Review



An Analysis of Division 24: Standards for Education Service Districts

Prepared by Gary Peterson, past director, Oregon Association of Education Service Districts, February 2023.

Table G1. Oregon Association of Education Service Districts Division 24 analysis summary

Rule	OAESD recommendation to keep, change, or remove	OAESD analysis comments
<u>581-024-0190:</u> Legal Name, Common Name and Annexation	Remove	This standard is the enabling language for the implementation of Senate Bill 262 (1993), the ESD Reorganization Act. With January 10, 1996, being the date for completion of the decisions to be made by the ESD boards within the various regions for the formation of the “new” ESD, this standard is no longer applicable or necessary.
<u>581-024-0191:</u> ESD Merger, General Requirements	Keep	This standard continues to be applicable and was utilized in 2003 when Yamhill ESD voluntarily merged with Willamette ESD and in 2011 when Union-Baker ESD merged with Intermountain ESD.
<u>581-024-0192:</u> Establishment of Zones for New ESD	Change	Although the standard directly related to new ESDs, section 2 is applicable to all current ESDs as ORS 334.032 (1) states that <i>(1) The board of directors of an education service district shall divide the education service district into not more than 11 zones as nearly equal in census population as may be practicable, measured along common school district boundary lines except that zones may be established using voting precinct boundaries in order to achieve greater equality of population. If possible, the board shall establish the zones so that each county within the education service district, the majority of the land area of which lies within the boundaries of the education service district, has at least one member on the board.</i> The standard for current ESDs, then, is to adjust the census population of board zones for their respective board following the U.S. Census every 10 years.
<u>581-024-0193:</u> Election of Board of New ESD	Keep	This standard remains applicable in the event two ESDs should merge but is otherwise not applicable on a regular basis.
<u>581-024-0205:</u> Definitions	Change	This current list of definitions remains applicable. Additional definitions could include the Student Initiatives Account from which ESDs now receive funds and a definition of “conditionally” standard.



Rule	OAESD recommendation to keep, change, or remove	OAESD analysis comments
<u>581-024-0206:</u> Powers and Duties	Remove	(3)(b) The requirement for the ESD to maintain completed audits for 20 years appears to be out of date. (3)(c) The requirement that ESDs serve as the boundary board for school districts was removed by House Bill 3298 in 2011 and subsequently removed from statutes by HB 2148 in 2013.
<u>581-024-0208:</u> Mission, Roles and Goals	Remove	(2)(e) Senate Bill 250 (2011) changed the annual reporting requirements as follows: No later than October 1 of each year, the board of directors of an education service district shall produce an annual report related to the performance and the finances of the education service district for the previous school year. The purpose of the report is to provide information to parents, component school districts and the Department of Education and to improve education service districts through greater involvement of persons who are interested in the success of education service districts. (2) The annual report that is produced as required by this section must include: (a) The size and demographics of the education service district; (b) The number of students served by the education service district, identified by school district; (c) Services provided by the education service district, and how those services align with the goals described in ORS 334.175 and the local service plan developed for the education service district; (d) The number of hours of services provided by the education service district, identified by category; (e) The staff of the education service district, identified by category; (f) The use of distance learning; and (g) The education service district's revenue and expenditures, including employee salary information. (3) The board of directors of the education service district must: (a) Submit the report produced as required by this section to: (A) The component school districts of the education service district; and (B) The Department of Education.



Rule	OAESD recommendation to keep, change, or remove	OAESD analysis comments
<u>581-024-0210:</u> Administration of the Standardization Requirements	Remove	(3)-(6) A “review of the Local Service Plan/Annual Report” and “on-site” evaluations was replaced by the annual reporting requirements stipulated in Senate Bill 250 (2011).
<u>581-024-0215:</u> Assignment of Standardization Classification	Remove	The current standards are, in many cases, significantly out of date and, therefore, do not readily lend themselves to classification for standardization purposes. In addition, the standards in their current form do not readily describe the characteristics for designations of “standard”, “nonstandard” or, “conditionally standard.”
<u>581-024-0226:</u> Assessment and Evaluation of Services	Remove	The annual reporting requirements were replaced by new requirements stipulated in SB 250 (2011). Unfortunately, the data contained in these revised annual reports does not readily lend itself to determine the level of compliance with state standards. The “procedures used in assessing the performance of services provide by the district...” have been replaced by the descriptive data outlined in the statute.
<u>581-024-0228:</u> Review School District Operations	Remove	This standard has not been an expectation of ESDs since the State Board action of 2008, designating the potential scope of the review of district operations for 2008-09. The State Board could renew such designation as noted in (3)(b). The current annual reporting requirements do not provide a format or template for summarizing the review of school district operations by an ESD should one take place.
<u>581-024-0231:</u> Curriculum Improvement	Change	This standard could be updated to include reference to assessment of student progress and technical assistance to school districts in the development of plans associated with the Student Success Act and the Student Initiatives Account, including the role of the ESD in supporting regional and individual district student performance growth targets.
<u>581-024-0235:</u> Special Education Services	Change	As many ESDs provide early childhood special education and early intervention services, these could be added to section (1). Another section could be added to indicate a description of the scope of services for special education, service for at-risk students, and schoolwide behavior and mental health services which are included in the district’s Local Service Plan.



Rule	OAESD recommendation to keep, change, or remove	OAESD analysis comments
<u>581-024-0240:</u> Administration	Change	This standard should include reference to ORS 334.225 which stipulates that a “superintendent (of an ESD) must hold an administrative license as a superintendent” and “the education service district board shall designate the superintendent as the district clerk.
<u>581-024-0245:</u> Staff	Change	The number of staff by category, licensure, certification, and program area could be added to this section .
<u>581-024-0250:</u> District Boundary Board	Remove	The requirement that ESDs serve as the boundary board for school districts was removed by House Bill 3298 in 2011 and subsequently removed from statutes by HB 2148 in 2013.
<u>581-024-0252:</u> Boundary Changes	Remove	The requirement that ESDs serve as the boundary board for school districts was removed by House Bill 3298 in 2011 and subsequently removed from statutes by HB 2148 in 2013.
<u>581-024-0255:</u> Attendance Supervision	Keep	This standard remains a responsibility of ESDs as required by ORS 339.040.
<u>581-024-0257:</u> Children Instructed by Parent or Private Teacher	Change	This standard relates to the ESD responsibility for examination of the academic progress of students taught by parents, guardians, or private teachers. It likely should include language from ORS 339.035 pertaining to the registration of home school students with the ESD in which they reside and the ESD responsibility to perform such service.
<u>581-024-0260:</u> Budgets	Remove	What is the statutory basis for the requirement in this standard that the ESD maintain a file of component school district budgets?
<u>581-024-0262:</u> Budget Committee		No analysis provided.
<u>581-024-0265:</u> Audits	Change	An additional requirement for ESD audits should include the provision that 90 percent of the local and state school funds designated for supporting the provisions for service in the local service plan are being met. The role of the ESD in the annual audits conducted by component school districts should be clarified.



Rule	OAESD recommendation to keep, change, or remove	OAESD analysis comments
<u>581-024-0270:</u> State Board Assistance	Remove	(4) For practical, cost and efficiency reasons, the Department no longer conducts onsite “standardization visits”.
<u>581-024-0275:</u> Facilities, Safety and Emergency Planning	Keep	This standard is reasonably up to date as it was revised in 2016 following approval of House Bill 2789 (2013) and House Bill 2661 (2015). Further Legislative action, House Bill 2574A (2017) and House Bill 3427 (2019), which established the Statewide School Safety and Prevention System, could provide the basis for additional changes.
<u>581-024-0280:</u> Auxiliary Services		No analysis provided.
<u>581-024-0285:</u> Local Service Plans	Change	The language in this standard parallels the language in ORS 334.175. As a standard it would be much more relevant and usable if the content were in checklist format with rubric descriptions for standard, conditionally standard on nonstandard.
<u>581-024-0290:</u> Advisors to the Board		No analysis provided.
<u>581-024-0300:</u> Advisory Committees		No analysis provided.
<u>581-024-0310:</u> Gifts and Bequests		No analysis provided.



Appendix H. Education Service District Reporting Structure

Example ESD Reporting by Accountability Domain

Service Delivery & Student Impact

What ESDs would submit:

- Service catalog (what was delivered, to whom)
- Participation rates by district and student groups
- Outcome metrics such as:
- Student learning indicators (where available)
- Educator practice improvements (professional development impact)
- Access/equity indicators
- Evidence of alignment to state priorities (e.g., literacy, special education)

Example indicators:

- Percentage of districts implementing supported instructional practices
- Growth in targeted student outcomes (where feasible)

District Partnership & Responsiveness

What ESDs would submit:

- Documentation of local service plan (LSP) approval (vote counts, average daily membership representation)
- Summary of district priorities that shaped the plan
- Results of district satisfaction/performance measures
- Evidence of service differentiation or customization

Example indicators:

- Percentage of districts reporting services met priority needs
- Satisfaction scores by service area
- Changes made in response to district feedback

Financial Stewardship & Resource Alignment

What ESDs would submit:

- Expenditure breakdown by service category
- Evidence that:
- ≥90 percent of funds supported approved services
- 100 percent of School Improvement Funds tied to LSP services
- Cost efficiency metrics (e.g., shared services savings)



- Audit results and financial compliance status

Example indicators:

- Cost per service delivered across districts
- Documented cost savings achieved through regionalization
- Percentage of funds directly tied to district-approved services

Accountability, Evaluation & Continuous Improvement

What ESDs would submit:

- Service evaluation methods and results
- Self-appraisal (what worked, what didn't)
- Improvement actions taken or planned
- Progress on prior-year goals
- Evidence used in ODE standardization review

Example indicators:

- Percentage of services evaluated annually
- Improvements made based on evaluation findings
- Status relative to "standard/conditionally standard" designation

System Leadership & Regional Coordination

What ESDs would submit:

- Regional initiatives and partnerships
- Shared service models implemented
- Cross-district coordination efforts
- Support provided to ODE/state initiatives

Example indicators:

- Number of multi-district initiatives launched
- Participation rates in shared services
- Evidence of improved regional coherence

Governance, Compliance & Operational Integrity

What ESDs would submit:

- Governance compliance evidence (policies, procedures)
- Audit and reporting compliance
- Staffing and licensure compliance



- Safety and facility compliance documentation

Example indicators:

- Timeliness of required reporting
- Audit findings (if any)
- Compliance status across required domains

Innovation/Entrepreneurial Services (if applicable)

What ESDs would submit:

- List of entrepreneurial services
- Business case:
- Costs vs revenue
- Benefit to component districts

Example indicators:

- Net benefit returned to districts
- Increased service capacity enabled

Overview of the Two-Year Cycle Model

Phase	Timing	Purpose
Planning and Approval	January–June (Year 1)	Develop and approve two-year LSP
Implementation Year 1	July–June (Year 1–2)	Deliver services
Midpoint Review	Winter (Year 2)	Adjust based on data
Implementation Year 2	July–June (Year 2–3)	Continue/refine services
Biennial Report	June (Year 3)	Full performance and compliance report

