



U.S. Department of Education
Office of Inspector General

The Oregon Department of Education's Implementation of Selected Components of Oregon's Statewide Accountability System

September 26, 2024
ED-OIG/A23IL0142

NOTICE

Statements that managerial practices need improvements, as well as other conclusions and recommendations in this report, represent the opinions of the Office of Inspector General. The appropriate Department of Education officials will determine what corrective actions should be taken.

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UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF INSPECTOR GENERAL

Audit Services

September 26, 2024

Dr. Charlene Williams
Director
Oregon Department of Education
255 Capitol Street NE
Salem, OR 97310

Dear Dr. Williams:

Enclosed is our final audit report, "The Oregon Department of Education's Implementation of Selected Components of Oregon's Statewide Accountability System," Control Number ED-OIG/A23IL0142. This report incorporates the comments you provided in response to the draft report. The U.S. Department of Education's policy is to expedite audit resolution by timely acting on findings and recommendations. Therefore, if you have any additional comments or information that you believe may have a bearing on the resolution of this audit, you should send them directly to the following U.S. Department of Education official, who will consider them before taking final Departmental action on this audit:

Adam Schott
Deputy Assistant Secretary for Policy and Programs
Delegated the Authority to Perform the Functions and Duties
of the Assistant Secretary for Elementary and Secondary Education
U.S. Department of Education
400 Maryland Avenue SW
Washington, D.C. 20202

We appreciate your cooperation during this audit. If you have any questions, please contact Jon Enslen, Assistant Regional Inspector General for Audit, at (312) 730-1620 or Jonathan.Enslen@ed.gov or me at (312) 730-1620 or Gary.Whitman@ed.gov.

Sincerely,

/s/

Gary D. Whitman
Regional Inspector General for Audit
Chicago/Kansas City Audit Region

Results in Brief

The Oregon Department of Education's Implementation of Selected Components of Oregon's Statewide Accountability System



Why the OIG Performed this Audit

The U.S. Department of Education allocates funds to States through statutory formulas based primarily on census poverty estimates and the cost of education in each State. To receive funding, a State must submit a State plan to the Department for review and approval. The State plan is intended to hold a State accountable for student academic achievement and school success and is required to include a description of its statewide accountability system.

For the 2021–2022 Federal funding period, the Oregon Department of Education (ODE) was awarded about \$146 million in Title I, Part A funds. Section 1003 of the Elementary and Secondary Education Act of 1965, as amended (ESEA), requires States to reserve at least 7 percent of their Title I funds or the sum of the amount reserved for fiscal year 2016, whichever is greater, to provide technical assistance and support for local educational agencies (LEA) with schools whose students are most in need of the additional support to improve their academic performance. Therefore, it is essential that the funds reach those students.

The objective of our audit was to determine whether ODE implemented selected components of its statewide accountability system in the fall of 2022 based on data for school year 2021–2022.

What did the OIG Find?

We found that ODE implemented the indicators used to measure student academic achievement and school success, applied a system of annual meaningful differentiation, and identified public schools as needing additional support and improvement in the fall of 2022 in accordance with Oregon's approved State plan and amendment and ODE's policies and procedures. We also found that ODE allocated additional funding to LEAs with schools identified in the fall of 2022 as needing additional support based on data for school year 2021–2022 (see [Finding 1](#)).

While ODE implemented the selected components of the statewide accountability system in accordance with Oregon's State plan, it did not identify one school that should have been identified for additional support and improvement (see [Finding 2](#)). Additionally, ODE did not provide additional funding to one LEA with three schools that it identified as needing additional support. Finally, ODE did not keep records showing how it calculated the amount of Title I funds reserved under section 1003 of the ESEA that each LEA should receive or records showing that it provided additional support services, such as ongoing professional learning and networking, technical assistance, and coaching, to LEAs with schools that it identified as needing improvement (see [Finding 3](#)).

What Is the Impact?

Stakeholders have reasonable assurance that ODE is implementing critical Title I-related components of Oregon's statewide accountability system in accordance with the approved State plan and amendment and ODE's policies and procedures. However, the LEAs and schools that were eligible for additional funding or support services but were not provided them did not have all the resources to which they were entitled and that were necessary to elevate their students' academic performance. Additionally, stakeholders do not have sufficient assurances that ODE is providing LEAs and schools with all the ongoing professional learning and networking, technical assistance, and coaching they need to improve their students' academic performance.

What Are the Next Steps?

We recommend that the Assistant Secretary for Elementary and Secondary Education verify that ODE provided additional funding, support services, or both, to the LEAs that should have received them; designed and implemented policies and procedures for calculating the amount of reserved Title I funds to allocate to LEAs with schools identified as needing additional support; and is keeping records showing how it is calculating the amount of funds provided to each LEA and showing that it is delivering the additional support services that it promised the LEAs and schools.

ODE agreed with each of our recommendations. We summarized ODE's comments and provided our responses at the end of each finding. We also provided the full text of ODE's comments at the end of the report (see [ODE Comments](#)).

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Introduction

Background

The Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act of 2015 (ESEA), authorizes the U.S. Department of Education (Department) to provide grants to States and local educational agencies (LEA) to improve the quality of elementary and secondary education. The ESEA consists of nine formula grant programs, including Title I (Improving the Academic Achievement of the Disadvantaged). The purpose of Title I is to provide all children significant opportunity to receive a fair, equitable, and high-quality education and to close educational achievement gaps. Title I, Part A provides financial assistance to LEAs and schools with high numbers or high percentages of children from low-income families to help ensure that all children meet challenging State academic standards. The Office of School Support and Accountability within the Department's Office of Elementary and Secondary Education is responsible for administering and overseeing the Title I, Part A program.

The Department allocates Title I, Part A funds to States through four statutory formulas that are based primarily on census poverty estimates and the cost of education in each State. Section 1003 of the ESEA requires each State to reserve at least 7 percent of its Title I allocation or the sum of the amount the State reserved and received for fiscal year 2016, whichever is greater, to carry out a statewide system of technical assistance and support for LEAs. For Federal fiscal years 2020 through 2023, Congress authorized about \$68.8 billion for grants to States and LEAs for activities allowed under Title I, Part A.

To receive funding under the ESEA, a State must submit a State plan to the Department for review and approval. The State plan is intended to hold States accountable for student academic achievement and school success and is required to include a description of the statewide accountability system. That accountability system should be based on challenging academic standards to improve student academic achievement and school success. The State should design its accountability system to measure progress toward achieving established long-term goals for reading or language arts and math proficiency, graduation rates, and English language proficiency for all students and separately for each student subgroup. The accountability system should include the following components: (1) long-term goals, (2) indicators used to measure student academic achievement and school success, (3) annual meaningful differentiation of

schools,¹ (4) identification of low-performing schools and schools with low-performing student subgroups, and (5) annual measurement of student academic achievement.

According to section 1111(a)(6), a State's approved plan remains in effect for the duration of the State's participation in ESEA programs. If at any time a State wants to make significant changes to its plan, it must submit a request to the Department in the form of revisions or amendments to the State plan.

The Oregon State Board of Education sets educational policies and standards for Oregon's public LEAs, education service districts, and community college districts. It also oversees the Oregon Department of Education (ODE). ODE focuses on helping LEAs achieve both local and statewide goals and priorities. It is responsible for developing policies and standards, providing accurate and timely data to inform instruction, and effectively administering numerous State and Federal programs. ODE's Office of Education Innovation and Improvement is responsible for providing resources and support services to and overseeing the lowest performing public schools in Oregon. For the Federal funding period from July 1, 2021, through September 30, 2022, the Department awarded ODE \$146,243,353 in Title I, Part A funds.

Oregon's State Plan, Statewide Accountability System, Waivers, and Amendment

ODE submitted Oregon's State plan to the Department on August 18, 2017.² The Department approved the plan on August 30, 2017. Oregon's State plan established the procedures that ODE should follow to identify schools for additional support in two school improvement categories: comprehensive support and improvement (CSI) and targeted support and improvement (TSI) because of consistently underperforming groups. Schools identified for CSI are generally the lowest-performing 5 percent of all schools in Oregon that received Title I, Part A funds and public high schools with a graduation rate of 67 percent or less. Schools identified for TSI are generally those with one or more consistently underperforming student groups. Oregon's procedures ensure that all schools identified for TSI are also identified for additional targeted support and improvement (ATSI). Oregon's State plan also established the factors that ODE should

¹ A system that a State designs to annually make accountability determinations based on multiple indicators for each school and each school's student subgroups to differentiate its overall performance and quality from other schools.

² All approved State plans and amendments can be found at: <https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/essa-consolidated-state-plans/>.

use to identify and classify schools for additional support: (1) proficiency on statewide assessment in English language arts and mathematics, (2) change in average test scores for elementary and middle schools, (3) graduation rate, (4) progress in achieving English language proficiency, (5) regular attenders, (6) ninth grade students on track to graduation, and (7) five-year high school completion rate. The State plan's examples of the types of additional support to be provided included ongoing professional learning and networking, technical assistance, and coaching.

On March 27, 2020, the Department provided ODE with a waiver from the statewide assessment, accountability, and reporting requirements for school year 2019–2020 because of disruptions that the Coronavirus Disease 2019 (COVID-19) pandemic caused. On April 21, 2021, the Department provided ODE with another waiver, this time from the school identification and reporting requirements for school year 2020–2021. As a condition of the waiver, ODE agreed to identify public schools for CSI, TSI, and ATSI in the fall of 2022 to ensure that the identification of schools needing additional support resumed quickly.

To account for [short-term changes](#) to the statewide accountability system for school year 2021–2022, ODE submitted an amendment to Oregon's State plan on June 10, 2022. This amendment reflected changes ODE made to selected components of the accountability system. The Department approved ODE's amendment on June 30, 2022.

ODE's statewide accountability system focuses on measuring the success of a school and LEA beyond students' test scores. It covers 11 student groups: (1) all students, (2) economically disadvantaged students, (3) English language learners, (4) students with disabilities, (5) American Indian or Alaska Native students, (6) Asian students, (7) Black and African American students, (8) Hispanic and Latino students, (9) Hawaiian and Pacific Islander students, (10) white students, and (11) multiracial students. It also covers a combined underserved race or ethnicity student group, consisting of American Indian and Alaska Native, Black and African American, Hispanic and Latino, and Hawaiian and Pacific Islander. The combined student group allows inclusion of the performance of these students in the accountability system. Student groups are assigned level ratings for each indicator used to measure student academic achievement and school success.

ODE's "Accountability Details Policy and Technical Manual" (accountability technical manual) describes the procedures for calculating the indicators used to measure student academic achievement and school success, assigning level ratings to each school and each student group, and identifying schools that need additional support.

The COVID-19 Pandemic's Impact on ODE's Accountability System

Oregon requested an amendment to account for short-term changes to its statewide accountability system for school year 2021–2022 because of the disruptions that the COVID-19 pandemic caused. The Department approved the short-term changes to the accountability system, allowing ODE to

- measure the change in average test scores from school year 2018–2019 to school year 2021–2022 for grades 3 through 8 in lieu of student growth to calculate its “Other Academic” indicator;
- use data from school years 2018–2019 and 2021–2022 to calculate the following indicators: academic achievement, progress in achieving English language proficiency, regular attenders, and 9th grade on-track;
- identify schools for CSI, TSI, and ATSI because of consistently underperforming student groups when more than half of the school or student groups’ indicators are assigned a level rating of 1 (that is, in the lowest 10 percent of schools for that indicator); and
- require all LEAs with schools currently identified as needing additional support to submit a progress update describing the needs that the LEAs addressed and how they served students in addition to all other exit criteria.

Audit Results

ODE implemented the three selected components of its statewide accountability system in accordance with Oregon's approved State plan and amendment and ODE's policies and procedures. However, we noted two instances in which ODE either did not identify a school for additional support or did not provide additional support to schools it identified for additional support in the fall of 2022.

1. **Indicators used to measure student academic achievement and school success.** ODE implemented the indicators used to measure student academic achievement and school success in accordance with Oregon's approved State plan and ODE's policies and procedures ([Finding 1](#)).
2. **Annual meaningful differentiation.** ODE applied a system of annual meaningful differentiation to identify differences in school performance in accordance with Oregon's approved State plan and amendment and ODE's policies and procedures ([Finding 1](#)).
3. **Identification of low-performing schools and schools with low-performing student groups.** In all but one instance, ODE identified low-performing public schools and schools with low-performing student groups in accordance with Oregon's approved State plan and ODE's policies and procedures ([Finding 1](#)) ([Finding 2](#)).
4. **Additional funding and support services provided to LEAs with schools identified as needing CSI and TSI.** ODE provided additional funding to LEAs with schools identified as needing additional support in accordance with Oregon's approved State plan and ODE's policies and procedures. However, it did not provide additional funding to one LEA with three schools identified as needing TSI that were eligible for additional funding based on ODE's funding methodology. Additionally, ODE did not keep records showing how it calculated the amount of reserved Title I funds provided to each LEA with schools identified for CSI or TSI or keep records showing that it provided additional support services to LEAs with schools identified as needing additional support ([Finding 3](#)).

Finding 1. ODE Implemented Selected Components of the Statewide Accountability System in Accordance with Oregon's Approved State Plan and Amendment and ODE's Policies and Procedures

ODE implemented the indicators used to measure student academic achievement and school success and applied a system of annual meaningful differentiation in accordance with Oregon's approved State plan and amendment and ODE's accountability technical manual. ODE also identified public schools as needing additional support and improvement in the fall of 2022 in accordance with Oregon's approved State plan and its accountability technical manual.

Implementation of the Indicators Used to Measure Student Academic Achievement and School Success

ODE implemented the indicators used to measure student academic achievement and school success in accordance with Oregon's approved State plan and amendment and its accountability technical manual. We compared the indicators in ODE's accountability technical manual to the indicators established in Oregon's approved State plan and amendment. The indicators in the manual matched the indicators required by Oregon's approved State plan and amendment. Specifically, ODE measured student academic achievement and school success for elementary and middle schools using the six indicators identified in Oregon's approved State plan and amendment: (1) regular attenders, (2) English language arts (ELA) achievement, (3) mathematics achievement, (4) ELA average gap score change, (5) mathematics average gap score change, and (6) on-track to English language proficiency. ODE measured student academic achievement and school success for high schools using the seven indicators identified in Oregon's approved State plan and amendment: (1) regular attenders, (2) ELA achievement, (3) mathematics achievement, (4) on-track to English language proficiency, (5) 9th grade on-track, (6) four-year graduation, and (7) five-year completers (see [Table](#)).

Application of a System of Annual Meaningful Differentiation

ODE applied a system of annual meaningful differentiation to identify differences in school performance in accordance with Oregon's State plan and amendment and its accountability technical manual. To apply annual meaningful differentiation, ODE first calculated the indicators for each school's student groups. It then assigned each student academic achievement and school success indicator for each student group a level rating using a scale of 1 through 5. ODE determined the level rating by using the higher

of (1) the most recent years' data or (2) the average of two or three years of data being used to calculate the indicators. According to its accountability technical manual, ODE assigned level ratings as follows:

- Level 1: Below the 10th percentile of statewide scores for the indicator.
- Level 2: 10th percentile of statewide scores for the indicator.
- Level 3: School year 2016–2017 statewide average for the indicator (the baseline for measuring interim progress).
- Level 4: Halfway from the statewide average for the indicator to the long-term goal. For the average gap score change indicators, this level represented the 75th percentile for schools.
- Level 5: Long-term goal for the indicator (if applicable) or the 90th percentile for schools.

ODE established cutoff scores for each indicator of student academic achievement and school success in its accountability technical manual. It used the cutoff scores for each indicator to assign a level rating from 1 through 5 to each student group (see [Table](#)).³

Table. Cutoff Scores for Each Indicator and Corresponding Level Rating

Indicator	Grades	Level 5	Level 4	Level 3	Level 2	Level 1
Regular Attenders	Kindergarten through 5	93	89	85	65	<65
Regular Attenders	6 through 8	93	88	83	63	<63
Regular Attenders	9 and 10	93	86	78	48	<48
ELA Achievement	3 through 8 and 11	80	67	54	25	<25
Mathematics Achievement	3 through 8 and 11	80	62	43	13	<13
ELA Average Gap Score Change	3 through 8	5	-7	-19	-42	<-42

³ ODE assigned a level rating to every student group that had at least 20 students.

Indicator	Grades	Level 5	Level 4	Level 3	Level 2	Level 1
Mathematics Average Gap Score Change	3 through 8	4	-11	-24	-49	<-49
On-Track to English Language Proficiency	Kindergarten through 12	80	68	56	26	<26
9th Grade On-Track	9	95	90	84	66	<66
Four-year Graduation	9 through 12	90	82	74	67 ⁴	<67
Five-year Completers	9 through 12	97	90	82	74	<74

We selected a nonstatistical random sample of 64 schools from the population of 1,274 Oregon public schools that were operating during school year 2021–2022 to assess whether ODE correctly applied the system of annual meaningful differentiation. Following the procedures described in ODE’s accountability technical manual, we calculated level ratings for each indicator and student group for which ODE calculated level ratings in the fall of 2022. We compared the level ratings that we calculated to the level ratings that ODE assigned. We found that ODE correctly calculated level ratings for each indicator and student group. Therefore, we concluded that it applied the system of annual meaningful differentiation for all 64 schools included in our sample in accordance with Oregon’s State plan and amendment and the procedures described in its accountability technical manual.

Identification of Low-Performing Schools and Schools with Low-Performing Student Groups

ODE identified public schools in the fall of 2022 as needing CSI or TSI in accordance with Oregon’s approved State plan and its accountability technical manual. ODE based its

⁴ Level 2 was set under the ESEA requirement of identifying public high schools with a graduation rate of 67 percent.

identification of schools needing CSI on the level ratings assigned to the “All Students” group for school year 2021–2022. It made its CSI determinations as follows:

- If ODE rated the “All Students” group on fewer than five indicators, then it did not make a determination.
- If ODE rated a school on at least five indicators, and the school was a combined school (more than only grades 9 through 12) or high school, then it evaluated the indicators for four-year graduation and five-year completers.
 - If a school was a regular or charter school, and ODE rated the “All Students” group four-year graduation indicator as level 1, then it identified the school as needing CSI.
 - If a school was an alternative school, and ODE rated the “All Students” group five-year completers indicator as level 1, then it identified the school as needing CSI.
- If a school received Title I funds, ODE rated the “All Students” group on at least five indicators, and it rated 50 percent or more of the indicators as level 1, then ODE identified the school as needing CSI.

ODE based its identifications of schools needing TSI on the level ratings assigned to the student groups other than the “All Students” group for school year 2021–2022. If ODE identified at least one of a school’s student groups as needing TSI, and it did not identify the school as needing CSI for school year 2021–2022, then ODE made its TSI determinations as follows:

- If ODE rated a student group on fewer than five indicators, then it did not make a determination.
- If ODE rated a student group on at least five indicators, and it rated 50 percent or more of the indicators as level 1, then ODE identified the student group as needing TSI.
- If ODE rated a student group on at least five indicators, and it rated fewer than 50 percent of the indicators as level 1, then ODE did not identify the student group as needing TSI.

To determine whether ODE identified Oregon’s public schools for additional support and improvement in accordance with Oregon’s approved State plan and its accountability technical manual, we identified the Oregon public schools that ODE should have identified in the fall of 2022 as needing CSI and TSI following the procedures in

ODE's accountability technical manual. Then, we compared the names of the schools included on our list to the names of the schools that ODE identified as needing CSI and TSI. Except for one school (see [Finding 2](#)), ODE identified all public schools that were eligible for additional support and improvement.

Because we found that ODE implemented the indicators used to measure student academic achievement and school success, applied a system of annual meaningful differentiation, and identified public schools as needing additional support and improvement in the fall of 2022 in accordance with Oregon's approved State plan and ODE's accountability technical manual, we are not making any recommendations.

Finding 2. ODE Identified All but One of the Public Schools That It Should Have Identified as Needing CSI or TSI in the Fall of 2022

Based on their assigned level ratings for school year 2021–2022, ODE identified 183 public schools in the fall of 2022 as needing CSI or TSI in accordance with Oregon’s approved State plan and its accountability technical manual. However, it should have identified one additional public school as needing CSI.

According to Oregon’s approved State plan, ODE should be including youth correction education programs in its accountability system and assigning level ratings to schools with such programs based on the five-year completer indicator for the “All Students” group. ODE rated the regular, combined school with a youth correction education program on five indicators—regular attenders, English language arts achievement, math achievement, four-year graduation, and five-year completers. It rated the school’s “All Students” group five-year completers indicator as level 1. Therefore, ODE should have identified the school as needing CSI.

Because ODE did not identify the one school as needing CSI in the fall of 2022, the school did not receive the additional support services to which it and its students were entitled and that were needed to improve the students’ academic performance.

Recommendation

We recommend that the Assistant Secretary for Elementary and Secondary Education verify that ODE—

- 2.1 Provided additional support services to the regular, combined school with a youth correction education program that should have been identified for CSI in the fall of 2022 based on its assigned level rating for school year 2021–2022.

ODE Comments

ODE agreed that it did not identify one school as needing CSI in the fall of 2022. Therefore, it identified the school for CSI and updated its accountability system; going forward, schools with youth correction education programs will be included in CSI and TSI identification cycles. ODE stated that its program personnel are in coordination with school personnel in support of improvement planning.

OIG Response

ODE did not provide any records supporting that it has already taken corrective actions. However, if implemented as described, the actions would be responsive to the draft report recommendation.

We did not verify whether ODE took the corrective actions it described because ODE will be implementing them after the end of our audit work. Therefore, we revised the recommendation to have the Department verify that ODE implemented the corrective actions as described.

Finding 3. ODE Provided Additional Funding to All but One Eligible LEA with Schools Identified as Needing Additional Support but Did Not Always Keep Sufficient Records

ODE provided additional funding to 35 LEAs with 133 public schools identified in the fall of 2022 as needing additional support based on their assigned level ratings for school year 2021–2022. However, it did not provide additional funding to one LEA with three schools identified as needing TSI and eligible for the additional funding based on ODE’s funding methodology. Additionally, ODE did not keep records showing how it calculated the amount of additional funding it allocated to each of the 35 LEAs or records showing that it provided additional support services to LEAs with schools identified as needing improvement.

ODE Provided Additional Funds to LEAs with Schools That Were Eligible for Funding Based on Their CSI or TSI Designations

In accordance with section 1003 of Title I of the ESEA, ODE’s Office of Education Innovation and Improvement provided additional funding to LEAs with schools identified as needing CSI and TSI in the fall of 2022 using the part of its Title I allocation that it reserved for section 1111(d) school improvement activities. Of the 1,274 Oregon public schools that were operating during school year 2021–2022, ODE identified 75 LEAs with 183 schools as needing additional support based on their assigned level ratings. According to ODE’s director of district and school improvement and “FAQ: Aligning for Student Success Integrated Guidance for Six ODE Initiatives,” ODE prioritized funding LEAs serving three or more schools identified as needing CSI or TSI and LEAs with 50 percent or more of their schools identified as needing CSI or TSI.

We reviewed reports on the additional funding that ODE provided to LEAs with schools identified in the fall of 2022 as needing additional support. Based on their assigned level ratings for school year 2021–2022 and applying ODE’s stated funding methodology, we concluded that ODE provided additional funds to 35 LEAs with 133 schools identified as needing CSI or TSI. However, contrary to its stated funding methodology, ODE did not provide additional funds to one LEA with three schools identified as needing TSI.

Because ODE did not provide additional funding to the LEA, the three schools identified as needing TSI did not receive the funding to which they were entitled and that was necessary to improve the academic performance of their students.

ODE Did Not Keep Records Showing How It Calculated the Amount of Additional Funding Allocated to Each LEA or That It Provided Additional Support Services to LEAs with Schools Identified as Needing CSI or TSI

In the fall of 2022, ODE identified 183 schools in 75 LEAs as needing CSI or TSI based on assigned level ratings for school year 2021–2022. Using the part of its Title I allocation that it reserved for section 1111(d) school improvement activities, ODE allocated \$9.9 million in additional funding to 35 LEAs with 133 schools identified as needing additional support. However, it did not keep records showing how it calculated the amounts of the Title I set-aside funds that it provided to each LEA.

We asked ODE for the policies and procedures that it followed when allocating Title I set-aside funds to LEAs with schools identified for CSI and TSI. We learned that ODE did not design policies and procedures for calculating the amount of Title I set-aside funds that each LEA should receive. As a result, we were unable to determine whether ODE allocated the Title I set-aside funds in accordance with its policy.

Oregon’s approved State plan identifies resources and support for LEAs with schools in need of improvement. This support should consist of ongoing professional learning and networking, technical assistance, and coaching from ODE. To determine whether ODE’s Office of Education Innovation and Improvement provided ongoing professional learning and networking, technical assistance, and coaching to LEAs with schools identified as needing additional support, we selected a nonstatistical stratified random sample of 10 schools from the population of 183 schools that ODE identified in the fall of 2022 as needing CSI or TSI. We asked for records showing that the 10 schools received the additional support that they should have received. ODE provided us with a list of technical assistance workshops that it scheduled at each of Oregon’s regional education service districts. However, ODE did not provide us with records for any of the 10 schools showing that (1) LEA and school personnel attended the scheduled workshops, (2) it provided technical assistance and coaching to the LEAs and schools, and (3) it had discussions with LEA and school officials about their needs at site visits.

According to Title 34 Code of Federal Regulations section 76.730, a State must keep records that show how it uses Federal grant funds and other records to facilitate an audit. In addition, Title 2 Code of Federal Regulations section 200.303(a) states that a non-Federal entity must establish and maintain a system of internal control that provides reasonable assurance that it is managing Federal grant funds in compliance with applicable statutes, regulations, and terms and conditions of the Federal award. The non-Federal entity’s system of internal control should follow guidance in “Internal Control Integrated Framework” issued by the Committee of Sponsoring Organizations of

the Treadway Commission or “Standards for Internal Control in the Federal Government” issued by the Comptroller General of the United States. Section 3.10 of “Standards for Internal Control in the Federal Government” states that documentation assists management by establishing and communicating the who, what, when, where, and why of internal control to personnel. Documentation also provides management with a means to retain organizational knowledge, mitigate the risk of having organizational knowledge limited to a few personnel, and communicate organizational knowledge to external parties, such as external auditors.

By not keeping sufficient records, ODE cannot show that it is providing LEAs and schools with the additional support services to which they are entitled and that they need to improve their students’ academic performance.

Recommendations

We recommend that the Assistant Secretary for Elementary and Secondary Education verify that ODE—

- 3.1 Provided additional funding and support services to the one LEA with three eligible schools identified as needing TSI that did not receive additional funding.
- 3.2 Designed and implemented policies and procedures for calculating the amount of Title I set-aside funds to allocate to each eligible LEA with schools identified as needing CSI or TSI.
- 3.3 Has records showing how it is calculating the amount of Title I set-aside funds to allocate to each eligible LEA with schools identified as needing CSI or TSI.
- 3.4 Has records showing that it is providing ongoing professional learning and networking, technical assistance, and coaching to LEAs with schools that it identifies as needing CSI or TSI.

ODE Comments

ODE agreed that it did not provide additional funding and support services to one LEA with three eligible schools identified as needing TSI and stated that the LEA will receive additional funding in the fall of 2024. ODE also stated that it will work with the LEA to develop plans for the implementation of school improvement activities, beginning no later than the start of school year 2025–2026.

ODE agreed that it did not design and implement policies and procedures for calculating the amount of Title I set-aside funds to allocate to each eligible LEA with schools identified as needing CSI or TSI. It also agreed that it did not keep records showing how

it calculated the amount of Title I set-aside funds that it allocated to eligible LEAs. ODE stated that policies and procedures are now documented and will be made available upon request.

ODE agreed that it did not keep records showing that it provided ongoing professional learning and networking, technical assistance, and coaching to LEAs with schools identified as needing CSI or TSI. ODE stated that it will start keeping such records and will make them available upon request. The records will include the names of the LEAs and schools, attendance records, and summaries of the support services provided.

OIG Response

ODE did not provide any records supporting that it has already taken corrective actions. However, if implemented as described, the actions would be responsive to the draft report recommendations.

We did not verify whether ODE took the corrective actions it described because ODE implemented or will be implementing these actions after the end of our audit work. Therefore, we revised the recommendations to have the Department verify that ODE implemented the corrective actions as described.

Appendix A. Scope and Methodology

Our audit covered ODE's procedures for implementing selected components of Oregon's statewide accountability system based on level ratings that ODE assigned to schools for school year 2021–2022. The three selected components were (1) indicators used to measure student academic achievement and school success, (2) annual meaningful differentiation, and (3) identification of schools needing additional support. Our audit also covered the additional funding and support services that ODE provided to LEAs with schools identified in the fall of 2022 as needing CSI and TSI.

To achieve our objective, we first gained an understanding of Title I (including Part A) of the ESEA; Office of Elementary and Secondary Education letters waiving accountability requirements for school years 2019–2020 and 2020–2021 (March 27, 2020, and April 21, 2021); and "Standards for Internal Control in the Federal Government" (GAO-14-704G, September 2014).

To determine whether ODE implemented the three selected components of Oregon's statewide accountability system and provided additional funding and support services to schools identified for CSI and TSI, we reviewed

- Oregon's approved State plan and amendment;
- ODE's accountability technical manual;
- ODE's calculations of the indicators used to measure student academic achievement and school success and its assignment of level ratings in the fall of 2022;
- a list of Oregon public schools that ODE identified in the fall of 2022 as needing additional support based on their assigned level ratings for school year 2021–2022;
- records of professional learning, technical assistance, and coaching; and
- reports on the Title I set-aside funds that ODE provided to eligible LEAs with schools identified in the fall of 2022 as needing CSI and TSI.

Sampling Methodology

ODE provided us with a list of 1,274 Oregon public schools that were operating during school year 2021–2022. We selected a nonstatistical random sample of 64 (5 percent) of

those 1,274 schools to determine whether ODE applied a system of annual meaningful differentiation in accordance with Oregon’s approved State plan and amendment.

Additionally, ODE provided us with a list of 183 Oregon public schools that it identified for CSI and TSI in the fall of 2022 based on level ratings that it assigned for school year 2021–2022. We selected a nonstatistical stratified random sample of 10 (6 percent)⁵ of those 183 schools to determine whether ODE used funds reserved under section 1003 of the ESEA to provide additional support services to Oregon public schools identified as needing additional support.

We designed our sampling plan and chose our sample sizes specifically to accomplish our audit objective. Because our samples were not large enough to project the results with the precision required by our policy, the results of our samples cannot be projected to the entire population of Oregon public schools that ODE identified for additional support.

Analysis Techniques

We interviewed ODE employees to gain an understanding of the procedures used to implement Oregon’s statewide accountability system. We also compared the procedures outlined in ODE’s accountability technical manual to the statewide accountability system described in Oregon’s approved State plan and amendment. We discussed any differences with ODE officials. Additionally, we analyzed ODE’s records relevant to implementing three of the five components of the statewide accountability system (indicators of academic achievement and school success, annual meaningful differentiation, and identification of low-performing schools and schools with low-performing student groups) to ensure that ODE implemented the components as described.

Indicators Used to Measure Student Academic Achievement and School Success

We compared the indicators in ODE’s accountability technical manual to Oregon’s approved State plan to ensure that the indicators in the manual matched the indicators in the plan. We also compared the indicators that ODE used to assign level ratings to the indicators in the plan. We concluded that ODE implemented the indicators used to

⁵ Five (9 percent) of the 59 schools identified for CSI and 5 (4 percent) of the 124 schools identified for TSI.

measure student academic achievement and school success in accordance with the plan if the indicators that ODE used to assign level ratings matched those in the plan.

System of Annual Meaningful Differentiation

We assigned level ratings for each indicator and student group for the 64 Oregon public schools included in our sample following the procedures described in ODE's accountability technical manual. We compared the level ratings that we assigned to the level ratings that ODE assigned. We concluded that ODE assigned level ratings for each school in accordance with the accountability technical manual if our assigned level rating matched ODE's assigned level ratings.

Identification of Low-Performing Public Schools and Schools with Low-Performing Student Groups

We created a list of Oregon public schools that ODE should have identified for CSI and TSI following the procedures for assigning level ratings and identifying schools as needing additional support described in Oregon's accountability technical manual. We then compared our list to the list of schools that ODE identified as needing CSI and TSI in the fall of 2022. We concluded that ODE identified schools for CSI and TSI in accordance with the accountability technical manual if the schools on our list matched the schools on ODE's list.

Procedures for Ensuring the Reliability of Data

We reviewed the procedures that ODE designed to provide reasonable assurance that the data it used to implement Oregon's statewide accountability system were accurate and complete. Additionally, we reviewed the manuals, guidance, and training that ODE provided to LEAs to use in collecting and validating data entered in the statewide accountability system. We did not complete our own procedures to assess the reliability of all the data that ODE used.

Use of Computer-Processed Data

We relied, in part, on a list of Title I schools that ODE provided to us and ODE's "Accountability Details" file, which included a list of all public schools in Oregon and their student groups to which ODE assigned level ratings. We used the list and other data to determine whether ODE implemented its procedures for identifying low-performing public schools and applying annual meaningful differentiation in accordance with Oregon's approved State plan and amendment. We used the indicators of student academic achievement and school success to recalculate level ratings following the

calculation described in Oregon’s approved State plan and ODE’s accountability technical manual.

To assess the reliability of ODE’s list, we compared the public schools on the list to the public schools listed in the National Center for Education Statistics’ data file for Oregon. We identified seven schools on ODE’s list that were not listed in the National Center for Education Statistics data file. We found that the schools on ODE’s list were Title I-designated schools for school year 2021–2022 but the National Center for Education Statistics data file included Title I-designated schools for school year 2022–2023. The seven schools were closed at the end of school year 2021–2022 and therefore were not included in the National Center for Education Statistics data file. Because we were able to reconcile the differences, we concluded that ODE’s list of Title I schools was sufficiently reliable for the purposes of our audit. We also concluded that ODE’s “Accountability Details” file was sufficiently reliable for the purposes of our audit.

Compliance with Auditing Standards

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

We conducted our audit at ODE’s office in Salem, Oregon, and our offices from July 2023 through May 2024. We discussed the results of our work with ODE officials on June 14, 2024, and provided them with the draft of this report on July 24, 2024.

Appendix B. Acronyms and Abbreviations

accountability technical manual	Oregon Department of Education “Accountability Details Policy and Technical Manual”
ATSI	additional targeted support and improvement
COVID-19	Coronavirus Disease 2019
CSI	comprehensive support and improvement
Department	U.S. Department of Education
ELA	English language arts
ESEA	Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act of 2015
LEA	local education agency
ODE	Oregon Department of Education
TSI	targeted support and improvement

ODE Comments



Oregon

Tina Kotek, Governor



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Dr. Charlene Williams

Director of the Department of Education

August 26, 2024

U.S. Department of Education-Office of Inspector General
Chicago/Kansas City Audit Region
500 W. Madison Street, Suite 1414
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% Jon Enslen, Assistant Regional Inspector General for Audit

Re: The Oregon Department of Education's Implementation of Selected Components of Oregon's Statewide Accountability System (Control Number ED-OIG/A23IL0142)

Thank you for sharing a draft report regarding the Oregon Department of Education's implementation of the Every Student Succeeds Act and our state accountability plan on July 24, 2024. ODE staff have reviewed this draft report and are providing our written comments on the findings and recommendations with this formal letter. This letter is being made available in both PDF and Word versions, as requested.

I appreciate the acknowledgement that ODE staff implemented the indicators used to measure student achievement and school success, applied a system of annual meaningful differentiation, and identified public schools as needing additional support in accordance with our approved State plan and amendments, as well as with relevant ODE policies and procedures, in 2022. ODE also agrees with the findings and recommendations included in the report. The following descriptions outline the actions we have taken to resolve the specific challenges identified in some of the findings:

- **Finding #2:** ODE did not identify one school that should have been identified for comprehensive school improvement.
 - *Response to Finding 2.1: ODE has identified the Youth Corrections school for comprehensive support, and has updated its system of meaningful differentiation to include Youth Corrections schools in current and future CSI and TSI identification cycles. Program staff are in coordination with staff at the identified school in support of improvement planning.*
- **Finding #3:** ODE did not provide additional funding to one LEA with three schools identified as needing additional support.

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U.S. Department of Education
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ED-OIG/A23IL0142



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Dr. Charlene Williams

Director of the Department of Education

- *Response to Finding 3.1: South Umpqua School District will receive \$172,145.94 in 1003a funds this fall. ODE will work closely with the school district to develop school-level plans for the funds earmarked for each school, with implementation of school improvement activities to begin no later than the start of the 2025-26 school year.*
- **Finding #3:** ODE did not keep records showing how it calculated the amount of funds set aside under section 1003 of the ESDE that each LEA should receive or record showing that it provided additional support services, such as ongoing professional learning, technical assistance, and coaching, to LEAs with schools identified as needing improvement.
 - *Response to Finding 3.2 and 3.3: Policies and procedures for calculating Title I set-aside (1003a) funds to allocate to each eligible LEA are now formally documented. Records will be kept and available upon request moving forward.*
 - *Response to Finding 3.4: Records reflecting ongoing professional learning and support, including networking, technical assistance, coaching and more rigorous interventions will be kept and available upon request. These will reflect more robust information, including the school district and school name, attendance records and summaries for the topic and content of each offering.*

We appreciate this opportunity to engage with the findings and respond, as well as the partnership in reviewing our state accountability system over the past year.

With gratitude,



Dr. Charlene Williams, Director
Oregon Department of Education