Secretary of State
Oregon Audits Division

Oregon Department of Education

High School Success Planning Is Robust, but ODE Can Enhance Benefits of Measure 98 by Improving Monitoring and Analysis

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Executive Summary

Oregon Department of Education

High School Success Planning Is Robust, but ODE Can Enhance Benefits of Measure 98 by Improving Monitoring and Analysis

Why This Audit is Important

» Oregon Ballot Measure 98 was approved by voters in 2016 to address Oregon's low high school graduation rate and expand career-technical course offerings.

» To carry out the intent of Measure 98, the High School Success program in the Oregon Department of Education (ODE) serves 230 school districts and charter schools, funding new or expanded career-technical education programs, college-level opportunities, and dropout prevention strategies.

» For the 2016-17 school year, when Measure 98 passed, 76.7% of students graduated within four years. By the end of the 2017-18 school year, Oregon's rate had improved to 78.7% for all students, but disparities in educational achievement persist for some populations.

» The High School Success team applies ODE's equity lens to recipients' self-assessments, plan development, and application processes.

What We Found

1. In implementing Measure 98, ODE held a robust and effective planning process, resulting in 230 recipients with approved plans. The majority of High School Success program recipients were satisfied with the planning process. (pg. 9)

2. High School Success program staff are deliberate about involving staff from other ODE programs, increasing collaboration within the agency and reducing the burden on recipients. (pg. 10)

3. Recipients can make changes to their plans throughout the year. ODE staff reviewed requested changes for statutory compliance, but did not evaluate the impact of changes on expected outcomes. (pg. 11)

4. ODE staff access student-level demographic and outcome data, but some information held by recipients is only reviewed during site visits. ODE staff are not able to easily aggregate it for higher level analyses across program participants. Additional analyses would help the High School Success program better align with ODE's larger equity initiatives. (pg. 13)

What We Recommend

We made five recommendations to ODE intended to improve the High School Success team's monitoring and data analysis processes.

ODE agreed with all of our recommendations. Their response can be found at the end of the report.

Introduction

Oregon Ballot Measure 98 was approved by voters on November 8, 2016, and established the High School Graduation and College and Career Readiness Fund. The measure's intent was to address Oregon's low high school graduation rate and expand career-technical course offerings. The Oregon Department of Education (ODE) created the High School Success program to oversee activities supported by this fund. This program is housed in ODE's Office of Education Innovation and Improvements.

ODE's mission is to foster equity and excellence for every learner through collaboration with educators, partners, and communities. Oregon, however, has struggled to graduate all its high school students. This audit, which is required by statute,[1] reviewed the High School Success program's processes to support districts and charter schools through planning, adjust approved plans, and determine whether program recipients, including school districts and charter schools, are operating according to ODE's equity lens.[2]
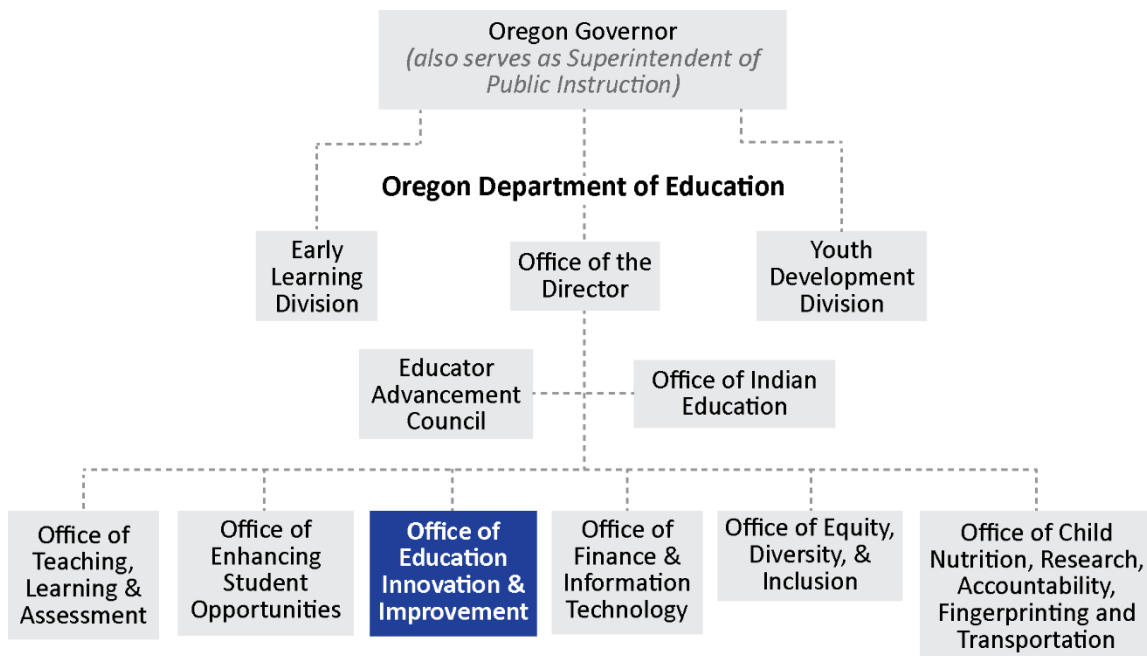
Many in the state share responsibility for the success of high school education

Improving high school outcomes requires the coordination of state government, local education agencies, and their partners. ODE supports the State Board of Education in carrying out its responsibilities for the general governance of public schools. Education Service Districts provide services to school districts on a regional basis, and both Education Service Districts and school districts work with Career and Technical Education (CTE) providers, community colleges, and businesses to deliver programs to high school students.

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[1] Oregon Laws 2017 Chapter 1, which established the High School Graduation and College and Career Readiness Fund, requires the Secretary of State to conduct financial and program audits every two years. House Bill 2246, which amended the Measure 98 Act, retained this requirement. The first financial audit of the fund (report 2020-20) was released in May 2020.
[2] https://www.oregon.gov/ode/students-and-family/equity/equityinitiatives/Documents/OregonEquityLens.

Oregon state government sets policies and oversees local education agencies

The responsibility to ensure that Oregon students graduate from high school is shared among state-level legislators, ODE, and the agency's regional and local educational partners. **State legislators** allocated money from the state's General Fund to support Measure 98 and, over the years, have passed legislation and approved grants that seek to enhance high school-related outcomes.

ODE administers and monitors these grants, provides technical assistance to local education authorities, and plays an important role in carrying out the **State Board of Education's** policies and standards. The seven members of this board are appointed by the **Governor**, who serves as Oregon's Superintendent of Public Instruction. ODE's director is the Deputy Superintendent of Public Instruction.

> We need to make sure that every single one of our students is Future Ready. That means each one of them graduates from high school with a plan for their future and the skills to compete in a global economy.
> *- Governor Kate Brown, 2019 Inaugural Address*

ODE collects, evaluates, and reports high school student performance information and works to address disparities in educational opportunity and attainment for students of color. The agency is charged with ensuring that school districts comply with laws and rules, including the federal Every Student Succeeds Act of 2015, which replaced the No Child Left Behind Act of 2001. The purpose of the Every Student Succeeds Act is to provide all children with significant opportunities to receive a fair, equitable, and high-quality education, and to close achievement gaps. ODE staffing consists of 639 positions with a 2019-21 legislatively adopted budget of $4.05 billion.

Oregon's 197 **school districts** and their elected boards are responsible for governing their schools consistent with the policies and standards set by the State Board of Education, while the state's 19 **Education Service Districts** assist local school districts in their designated regions by providing equitable, cost-effective, and locally responsive education services. School districts and Education Service Districts, in turn, work in conjunction with local businesses and community colleges to implement CTE courses.

CTE provides students with the academic content and relevant technical knowledge and skills needed to prepare for further education and careers in current or emerging professions. CTE programs of study may lead to industry-recognized credentials, certificates, or an associate degree. Examples of CTE courses currently offered in Oregon high schools include medical office procedures, digital arts, culinary arts, accounting, agriculture management, aquaponics, and fisheries technology.

ODE's Secondary/Post-Secondary Transitions team oversees the federal funds that come to the state out of the Strengthening Career and Technical Education for the 21st Century Act. This act is also called Perkins V, named for the sponsor of the original CTE Act of 1984 and because it is the fifth reauthorization of the legislation.

Perkins V requires states to develop four-year plans that present a strategic vision and goals for preparing an educated and skilled workforce and meeting the needs of employers. This includes ensuring equal access to CTE programs of study and activities. Perkins V activities are related to those of the High School Success program, given that program's support of CTE in districts and charter schools.

Oregon has struggled to graduate all its high school students

Key indicators show that Oregon's education system has challenges ensuring that all children succeed in high school. The system struggles to support students in the ninth grade while research is clear that students experiencing more challenges in ninth grade are more likely to drop out as sophomores and efforts to support them need to begin before they enter high school. Keeping children engaged in school through participation in coursework like CTE programs increases the likelihood that they will graduate.

Regular attendance, ninth grade on-track, dropout, and high school graduation rates are not yet hitting state benchmarks

In Oregon, students are considered regular attenders if they are present for more than 90% of their enrolled school days; this rate worsens as students advance in high school. For the 2018-19 school year, 79% of ninth graders, but only 60.7% of 12th graders, were regular attenders. The state's long-term goal is for 93% of students across all grade levels to attend regularly.

Students who have been enrolled in a single district for at least half of the school year are considered on-track to graduate when they have obtained at least 25% of the credits required for high school graduation in the ninth grade. For the 2018-19 school year, 85% of Oregon ninth graders were on-track; this rate has improved across student groups, although it is not yet at the state's long-term goal of 95%.

Oregon's high school dropout rate, measured for grades nine through 12, has also improved over the past five years, from a high of 4.3% of students in the 2014-15 school year to 3.6% in the 2017-18 school year. The United States has seen a similar decline, from 5.2% in 2014 to 4.7% in 2017, among students enrolled in grades 10 through 12.

Figure 1: Historically and traditionally marginalized students had the lowest four-year cohort graduation rates for 2017-18 [3]
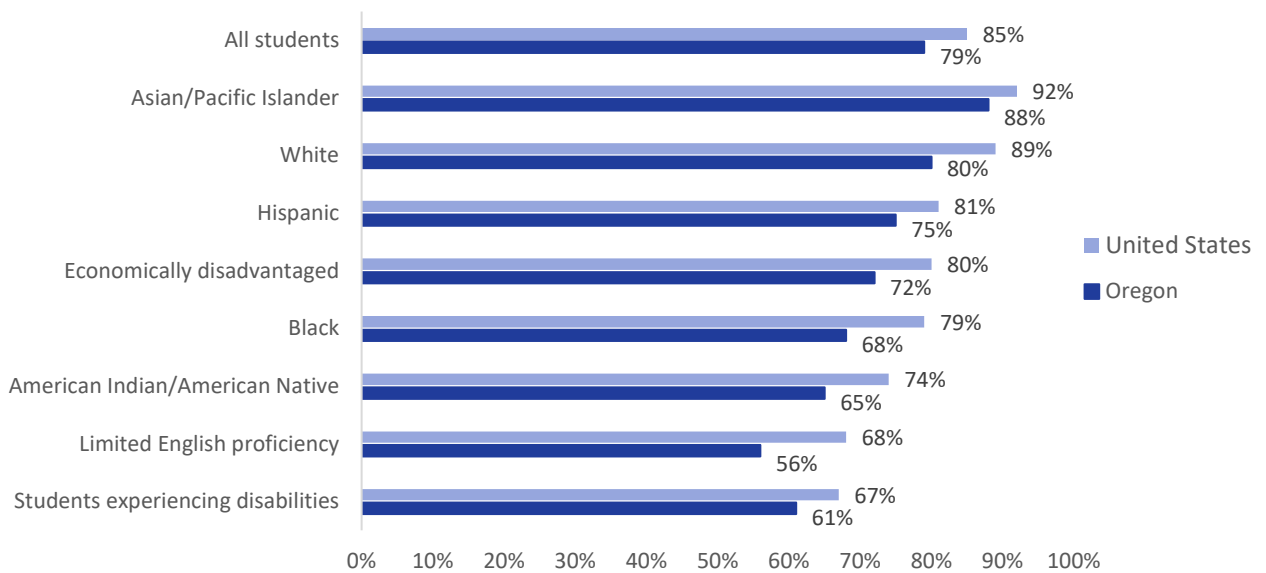
Source: Created using data from the National Center for Education Statistics. Oregon's homeless enrolled students had a four-year cohort graduation rate of 54%. That figure for the United States was not available.

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[3] In Oregon's 2017 Consolidated State Plan under the Every Student Succeeds Act, the term *historically and traditionally marginalized students* refers to English Learners, Black and African American students, American Indian and Alaskan Native students, Latino and Hispanic students, Asian and Pacific Islander students, Multi-racial students, students experiencing poverty, students with disabilities, and students who are LGBTQ.

ODE looks at the percentage of students who earn a regular or modified diploma within four years of entering ninth grade to determine the state's four-year cohort graduation rate. The long-term goal for this rate is 90%. For the 2016-17 school year, when Measure 98 passed, 76.7% of students graduated within four years. The national rate, at that time, was 84.6%. By the end of the 2017-18 school year, Oregon's rate improved to 79% for all students — but disparities in educational achievement persist for some populations, as shown in Figure 1.

Participation in CTE programs has a positive influence on high school graduation rates. CTE concentrators[4] are more likely to graduate high school than their peers at rates above the state average; this difference holds true across racial and ethnic groups, as shown in Figure 2.

Research has also shown that strategies aimed at improving middle school attendance could have as much, or more, of a payoff for high school and college graduation as efforts aimed at improving test scores.

Figure 2: CTE concentrators graduate high school at higher rates than their peers who don't participate in CTE
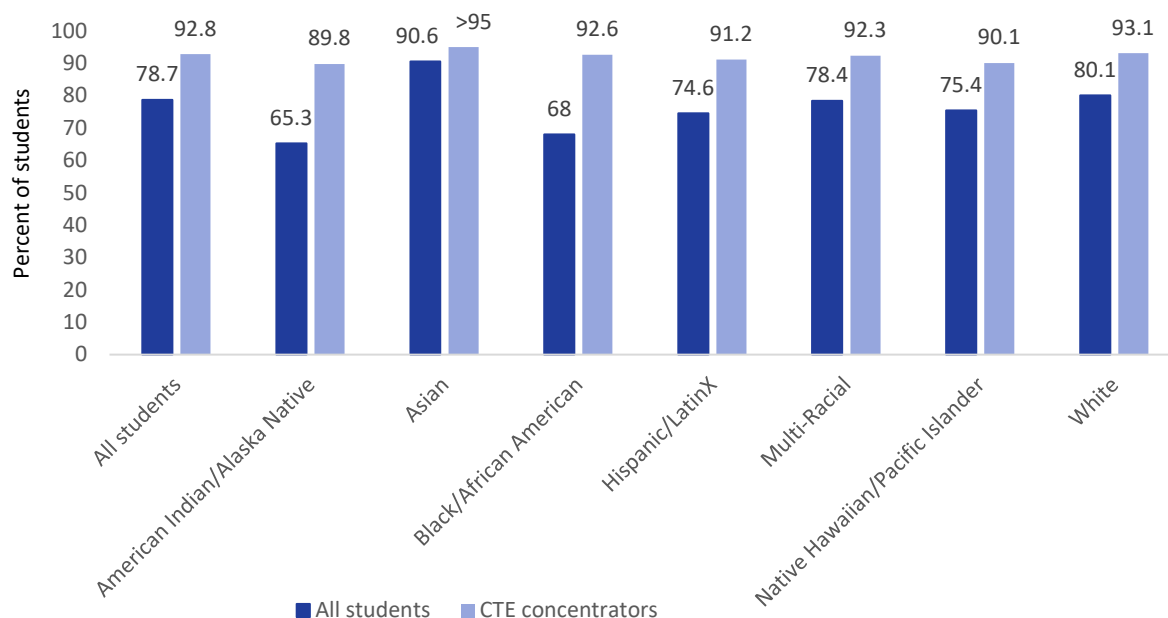
Source: ODE, *Oregon's CTE State Plan*, 2020-2024.

In addition to the High School Success program, ODE has implemented several interventions to address the multiple barriers students face to graduating high school. The intent behind these efforts is to identify early indicators of risk (e.g., grades or course failure, behavior) and students at risk, select and implement interventions, and continuously evaluate the effectiveness of those interventions. ODE's initiatives around this effort include the Early Indicator and Intervention System, the Statewide Chronic Absenteeism Plan, and the Trauma-Informed Pilot Project.

Measure 98 emphasized career-technical education, college-level opportunities, and dropout prevention strategies

The purpose of the High School Success program, created as a result of the passage of Measure 98, is to improve students' progress toward graduation, increase graduation rates, and advance high school students' college and career readiness. Districts and charter schools can apply for

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[4] A CTE concentrator is defined as, "[a]ny secondary student who has earned one or more credits in technical skill-based courses as part of an Oregon state-approved CTE program, of which at least one-half credit must be designated as a required course."

the funds and are required to meet specific eligibility criteria to receive their allocation. The funds are to be used to create new programs, not to maintain existing ones.

House Bill 2246 expanded Measure 98's eligibility and refined activities based on funding level

Oregon Ballot Measure 98 (2016) established a fund for school districts and charter schools to establish or expand opportunities and strategies in the following three areas:

- **Career-technical education**. CTE programs of study cut across multiple employment sectors including agriculture, food and natural resource systems, arts, information and communications, business and management, human resources, health sciences, and industrial and engineering systems.
- **College-level education**. These opportunities include advanced and dual-credit programs in conjunction with accredited institutions of higher learning such community colleges or public universities that offer the opportunity to earn college credit while a student is still enrolled in high school.
- **Dropout prevention strategies**. These include activities to reduce chronic absenteeism such as identifying students at risk of dropping out and giving them academic and social support and providing them with early exposure to employment opportunities and options for post-secondary education.

The measure required the Legislature to make available $800 per high school student, per school year out of the General Fund for these activities. The funds are apportioned to each school district based on the extended weighted average daily membership of high school students. The apportioned funds cannot be used to maintain programs established before the measure's effective date, except to replace the loss or expiration of funds from time-limited grants. The Legislature initially found $170 million for the fund for the 2017-19 biennium. The Student Success Act, passed in 2019, filled the remaining gap by adding an additional $133 million to the fund.

To qualify for an apportionment, districts and charter schools were required to conduct a self-assessment and have a biennial plan approved by ODE that met the following eligibility criteria:

- Setting aside time for teachers to meet and review data to identify students at risk of not graduating and to develop plans for those students;
- Implementation of evidence-based practices for reducing chronic absenteeism;
- Assignment of high school students to advanced and dual-credit courses based on academic qualifications to avoid bias in course assignments;
- Implementation of systems to ensure that high school students are taking courses required for on-time graduation; and
- Showing that the district or charter schools have created community partnerships.

In 2017, the Oregon Legislature amended the program through House Bill 2246 to include, as fund recipients, the Oregon School for the Deaf, the Youth Corrections Education Program, and the Juvenile Detention Education Program. House Bill 2246 also allows fund recipients to use up to 15% of their apportionments on students in the eighth grade.

The legislation also created a tiered system for the three areas established in the original ballot measure based on funding level. If, in the first year of the program, the recipient receives:

- Less than $100,000, they may choose to address any or all three programmatic areas as is appropriate to local need;

- More than $100,000 but less than $350,000, they must address CTE and one of the other two programmatic areas, but may address all three; or
- More than $350,000, they must address all three programmatic areas.

ODE's High School Success team consists of five education specialists, one research analyst, a program analyst, and an administrative specialist who all supported the 230 districts and charter schools that were awarded High School Success funds during the period reviewed during this audit. This team has been overseen by four superintendents and five directors since the program's inception.

The COVID-19 pandemic emerged during this audit and has short- and long-term consequences for Oregon's education system

The COVID-19 pandemic has significantly impacted Oregon's education system. On March 12, 2020, Oregon's Governor ordered the closure of K-12 schools beginning March 16, consistent with mitigation strategies recommended by the Oregon Health Authority and the U.S. Centers for Disease Control and Prevention. This audit was in progress at the time of the school closures. As a result, the audit team decided to focus the audit's objective on work performed by ODE for the High School Success program prior to the school closures.

We acknowledge that the pandemic will likely continue to bring about changes to Oregon's education system. The full economic impact of COVID-19 is unknown and may result in reductions to the state's education budget for the 2019-21 biennium and beyond. We recognize that these changes may influence ODE's ability to respond to the report's findings and recommendations.

Audit Results

Staff in ODE's High School Success program worked deliberately to implement Measure 98. They developed robust guidance, held planning and approval workshops around the state, and engaged ODE staff from other departments. Ultimately, 230 recipients developed plans to meet state and local goals in compliance with statute and ODE's equity focus. High School Success program staff also conducted monitoring visits and reviewed and approved changes to plans requested by districts and charter schools throughout the year.

Although the plan development and approval process was robust, the process to approve mid-year change requests focused on statutory compliance and did not include a review of how requested changes may affect expected local outcomes. In addition, the evaluation plan for the High School Success program does not include goals, targets, timelines, and performance measures against which to review local plan changes and differentiate the effect of Measure 98 from other initiatives to improve high school graduation rates. Additional equity analyses for the program overall could help ODE staff demonstrate the program's contributions to statewide equity efforts.

The High School Success team facilitated an effective plan development process

The High School Success team supported districts and charter schools effectively through the plan development, application, and change process. The team developed tools and processes to guide their internal work, communicate that work to others, and assist districts and charter schools. The team also involved staff from other ODE programs to increase cross-office coordination and ease programmatic burdens on recipients.

The team laid a solid foundation for the program's implementation

ODE staff used an effective approach when they implemented the High School Success program. They developed a project charter and identified relevant metrics. They created a monitoring plan, a draft internal performance plan, steps for auditing expenditures, and additional tools to guide and standardize their work. Education specialists were assigned, by region, to support program recipients, and the team set up an online tool through which districts and charter schools applied for the funds.

The High School Success team also developed tools and guidance to help applicants meet planning and eligibility requirements. These tools included a self-assessment rubric, a plan template, and plan change instructions. The self-assessment was completed by districts and charter schools prior to writing their plans to examine the health of their education systems. Applicants looked at many aspects of their operations, including whether they had set aside time for teacher collaboration to review students' progress, if they were monitoring equitable assignment to courses, and their work developing community partnerships.

ODE offered workshops around the state for plan development and approval

Districts and charter schools could develop their High School Success plans on their own or during the optional first day of the two-day regional workshops that the High School Success team held. Sixteen workshops were held around the state, including as far south as Medford, to the east in Malheur County, at the coast in Coos Bay, in Redmond and The Dalles, and urban centers of Portland and Salem.

Prior to writing their plans, districts and charter schools were given baseline data sheets that showed how they were performing on key performance measures, such as the four-year

graduation rate, broken down by various student populations. The optional first day of the workshop gave recipients the time and space to write their plans. The template for these plans required recipients to specify goals and activities for their selected areas of focus and to state how they were going to address equity.

Attendance on the second day of the regional workshops was required of all recipients, who broke into small groups with local peers from similar-sized districts and presented their plans to each other for feedback. Also on the second day, High School Success staff met with recipients one-on-one to review the plans and either offer approval or point out changes that were needed. The High School Success team staff reviewed the proposed plans for statutory compliance and evidence of intentional attention to equity. The High School Success team has made deliberate efforts to involve staff from other ODE programs to increase collaboration and reduce programmatic burdens on recipients.

The High School Success team deserves credit for involving staff from other ODE programs to improve cross-office collaboration and create efficiencies for districts and charter schools. The team is modeling how to break down silos and improve communication within the agency, which ODE has been asked to address in past audit reports.[5]

Staff from other ODE programs participated in the early stages of the High School Success program in several ways. Initially, the High School Success team invited personnel from 15 different ODE teams or groups to an early internal meeting at which the team presented their plan and scheduled visits with districts and charter schools.

Interested staff from the following nine ODE teams or units attended regional planning meetings and monitoring visits:

- District and School Effectiveness;
- Secondary/Post-Secondary Transitions;
- Alternative Education;
- Every Day Matters;
- Youth Corrections Education Program;
- Juvenile Detention Education Program;
- Programs & Practices;
- College and Career Readiness; and
- Indian Education.

One High School Success team member also serves as a liaison to the Higher Education Coordinating Commission and the Regional Promise program.

The High School Success team and other ODE program staff benefited from the cross-office collaboration. The High School Success education specialists told us that staff from other teams brought useful perspectives and existing local relationships to their work. They also provided the team with information and conducted analyses for them on specific topics. In turn, participation in the workshops and monitoring visits gave staff from other teams the opportunity to interact with, and ask questions of, local recipients.

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[5] Oregon Audits Division, *Oregon Department of Education Should Take Further Steps to Help Districts and High Schools Increase Oregon's Graduation Rate*, December 2017, Report 2017-29.
Oregon Audits Division, *Stronger Accountability, Oversight, and Support Would Improve Results for Academically At-Risk Students in Alternative and Online Education*, December 2017, Report 2017-30.
Oregon Audits Division, *Department of Education and Portland Public Schools: Must Do More to Monitor Spending and Address Systemic Obstacles to Student Performance, Particularly at Struggling Schools,* January 2019, Report 2019-01.
Oregon Audits Division, *ODE Can Better Support Students Experiencing Disabilities Through Improved Coordination and Monitoring of Services,* June 2020, Report 2020-24.

For example, ODE's Alternative Education coordinator had the opportunity to visit alternative education programs in the state and to speak with other ODE staff who work with them. Additionally, the High School Success team is working with the team overseeing the Perkins V grant to align CTE objectives and reduce the work recipients are required to do to support both programs. Staff outside the High School Success program praised the team for their continuous improvement orientation and said they would like to see the process replicated within other parts of the agency.

Feedback from a recipient satisfaction survey can improve future plan development cycles

The High School Success team asked recipients to evaluate the workshops using a satisfaction survey, which garnered 105 responses. We analyzed the survey's results and comments and found a very high level of satisfaction with the workshops. Over 90% of the participants agreed or strongly agreed that the plan approval session, and the support they received from ODE staff, was helpful. Over 90% also appreciated the regional approach and would like to see the same process repeated in the future.

With such a high level of satisfaction, the High School Success team may not need to change their approach to the two-day workshops. We did, however, examine themes across responses to the question asking recipients for suggestions to improve the process.

Most commonly, recipients asked the team to clarify, in advance, the workshop's expectations and process, and they suggested new tools to help them understand those expectations, the self-assessment, budget, and planning process. The suggested tools included a one-page document describing the work of other recipients, a tutorial for the self-assessment, and a webinar in advance of the workshop's planning day.

> **Participant comments about the regional planning workshops**
>
> "This was wonderful, and we learned a lot. This would be great to do with other teams and grants."
>
> "I thought it was so great. I would like something similar each year to develop new ideas and assess what we are doing."
>
> "Overall, I loved it, and I have done this work for many years."

Reducing constraints on staff time can improve the review process for requested plan changes, recipient monitoring, and program evaluation

After the planning process concluded and High School Success plans were approved, recipients were able to request changes to their plans as their spending needs changed. The High School Success team reviewed the changes for statutory compliance, but the review did not include an evaluation of how changes were expected to affect local outcomes. The High School Success team is small and they spend time providing technical assistance to recipients who are sometimes unable to access the systems to request changes. Without their own performance measures, the team also has difficulty demonstrating how their work to implement Measure 98 contributes to statewide successes in improving graduation rates.

ODE staff reviewed change requests for statutory compliance but did not evaluate the impact of changes on expected local outcomes

After High School Success plans were developed and approved, recipients could request changes throughout the year. The High School Success team has procedures for reviewing and approving changes that ensure the recipient is still in compliance with statute, but for the time period reviewed during this audit, these procedures did not include a step to look at how the changes were expected to affect the recipient's planned outcomes. Below are examples of changes that have occurred and could warrant a review of how the requested changes could impact a recipient's original goals.

- One school district planned on, and spent, award money in the dropout prevention category, but the activities presented in the original plan were only tied to CTE.

- A second district overspent on middle school activities by approximately $24,000 when only $1,000 had been budgeted, which likely required spending shifts from other categories.

- A note was made by High School Success staff about a third district for which the expenditure report did not match up with the plan in almost every area.

As part of plan development and approval, High School Success staff and recipients discussed baseline levels for indicators such as dropout and four-year graduation rates. This helped recipients direct their award money toward goals and activities that will improve these indicators. In their plans, recipients set targets and timelines for the outcomes they hoped to accomplish during the award period. They also submitted their anticipated expenditures in allowable spending categories.

> CTE concentrators are **more likely to graduate high school** than their peers at rates above the state average.

Recipients should work to achieve the outcomes approved during the initial planning process. Adding a step to evaluate the impact of changes on expected outcomes would close the loop in the process that began with a review between High School Success staff and local recipients about indicators needing improvement.

The High School Success team experiences constraints in several areas

Within the High School Success team, five education specialists cover 230 recipients. Their work is supplemented by a research analyst, a program analyst, and an administrative specialist. Because of the large number of recipients, the team's research analyst, who has 18 years of data analysis experience, is assisting with recipient support work. As a result, the team is missing opportunities to perform larger program analyses, such as calculating educator equity gaps or reviewing data on High School Success initiatives that affect alternative schools and programs, which experience some of the lowest graduation rates in the state.

Local recipients submit their expense claims electronically through ODE's E-Grant Management System, a centralized, uniform electronic grant system used to monitor recipients' spending. We heard that, while this system is adequate for what it needs to do, it is slow and archaic. The team lead runs most of the E-Grant Management System claims and fields issues about those claims from teammates, who are constantly going through expenditure reports.

The High School Success Team uses a second system, SurveyMonkey Apply, for recipients' grant applications, assessments, and expenditure reporting. ODE has a contract with SurveyMonkey Apply for its use. Recipients have had difficulties using SurveyMonkey Apply, including being unable to access the system, which requires High School Success staff to provide technical support and, in some cases, enter the requests themselves.

The difficulties created by each of these systems constrain staff time, reducing the amount of time they are able to spend on their primary goals. ODE is planning a replacement for the E-Grant Management System, but that replacement is not expected soon and may not fully meet the program's needs.

Although the High School Success program is planned well, the team may have difficulties measuring impact

The High School Success team's internal performance evaluation plan is currently in draft form and should be formalized. Without a formally documented plan, the team's direction and goals can shift with changing leadership. The High School Success program has experienced high leadership turnover since its inception, which makes it difficult to maintain a strong and consistent strategy that can be shared within the agency and across local recipients.

Students participate in an agriculture CTE program in Monument, Oregon. Source: ODE.

The draft plan focuses on process measures (e.g., documentation of site visits, approved plans, executed grant agreements) and does not include state-level goals, targets, timelines, and performance measures for evaluating interim outcomes. Without these, it will be difficult for the program to capture the work of local recipients and demonstrate its value to the public.

For example, stakeholders will likely want to know how many new CTE teachers were hired across the state with the funds and whether more historically marginalized students are taking advanced courses to earn college credit as a result of the program's efforts. State-level goals, targets, and timelines could serve as benchmarks against which the High School Success team could evaluate changes requested by recipients to their local plans.

In addition, without program-specific outcome measures, it will be difficult to differentiate the effect of Measure 98 and the High School Success program from that of other initiatives working to improve graduation rates. These initiatives include any that might be funded in the future by the Student Success Act, ODE's current work on chronic absenteeism and its Early Indicator and Intervention System, and the existing CTE and Science, Technology, Engineering, and Math hubs around the state. Graduation rates in the state have improved recently, but the team will not be able to point to the specific effect of its efforts on that success without its own measures. The analysis of robust data will be key to measuring the program's effect.

The High School Success team looks at detailed equity data at the recipient level, but is limited in its ability to conduct higher-level equity analyses

In Oregon and nationally, historically and traditionally marginalized students graduate at lower rates from high school than their peers. The Every Student Succeeds Act requires measures of student progress to be examined within each state, local education agency, and school. Oregon education agencies do so by examining key indicators, such as high school graduation and dropout rates by various student groups. Future ODE reports will evaluate whether historically marginalized students have equitable access to experienced, effective teachers. Until the agency does so, the High School Success team could further its equity work by asking local recipients to look at this issue. The team could also prioritize the work of its research analyst to advance programmatic and equity goals.

Data access barriers impose limits on the High School Success team's ability to identify equity barriers, schools needing support, and promising approaches among recipients

The High School Success team compiles data reports that are shared with districts and charter schools during monitoring site visits. These summaries present key outcome measures broken down by student groups for each district or school. Additional data held by the district or school is also reviewed during these visits, and both sets of information are used to discuss what is being done to ensure equity in the recipient's High School Success-funded activities.

The High School Success team, however, experiences barriers to data collection and analysis that hinder the examination of programmatic and equity goals. For instance, ODE annually receives student-level enrollment data, such as basic demographic information, from school districts and charter schools, but the agency cannot see how students have performed in their courses. Because some data is held by individual districts and schools, the team also cannot easily aggregate that information across participants. In addition, as was noted in a previous audit, basic information about alternative schools and programs continues to be limited.[6] Alternative and online schools accounted for about 10% of Oregon's public high school enrollment in the 2015-16 school year, but nearly half of the state's high school dropouts.

These limitations prevent the High School Success team from conducting analyses that might more precisely diagnose equity barriers for specific student populations. Additional equity analyses could also aid the identification of recipients needing targeted support, allowing the team's education specialists to more efficiently conduct monitoring visits. Without the necessary data, the team may also be missing opportunities to identify and share promising, evidence-based approaches among recipients.

The High School Success team is developing a plan to evaluate internal program performance, but this plan focuses on process, such as the number of visits made, and not interim or long-term outcomes like the change in dropout prevention activities conducted as a result of program funds. ODE's Office of Education Innovation and Improvement, in which the High School Success program sits, is working on a long-term vision for the office to help guide programmatic objectives and consistent monitoring and evaluation tools from an agency level. Until that vision is realized, expanding the internal plan to include outcome objectives, targets, timelines, and data measures could provide direction for the collection and analysis of data that will further programmatic and equity goals.

The High School Success team could better align with larger ODE equity initiatives

The High School Success team thoughtfully applied ODE's equity lens to recipients' self-assessments, plan development, and application processes. The team could further enhance their work by aligning their equity analyses with larger ODE initiatives.

For example, the state's 2015 Equitable Access to Educators plan identified recruitment and retention of educators, particularly educators of color, as Oregon's primary equity gap. The High School Success program's self-assessment rubric asks recipients whether CTE teachers in newly created or expanded programs are appropriately licensed or endorsed, but it does not ask them to look at the quality of educators teaching historically marginalized students. The state is also focusing on preparing teachers and administrators for success in racially and linguistically diverse classrooms, which the self-assessment tool does not address.

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[6] Oregon Audits Division, *Stronger Accountability, Oversight, and Support Would Improve Results for Academically At-Risk Students in Alternative and Online Education,* December 2017, Report 2017-30.

The Every Student Succeeds Act asks states to examine and publish educator equity gaps, which reflect whether low-income and minority children are served at disproportionate rates by inexperienced or ineffective educators or those teaching out of their field. ODE has not publicly reported updated analyses since 2017. ODE expects to update this information in their next Educator Equity report. Until the agency can provide the High School Success team with this information for each school district, the team might consider asking recipients to look at educator equity gaps independently.

ODE's continuous improvement process asks local education agencies to reflect on whether they are identifying and removing barriers to advancement, participation, and opportunity and replacing those barriers with inclusive and equitable practices. The High School Success team has an opportunity to conduct equity analyses to align with ODE's larger equity initiatives.

Recommendations

To foster improvements in monitoring and analysis, we recommend ODE and the High School Success team:

1. Include in the annual expenditure review process, and in future plan development and approval processes, a review of past planned and actual expenditures, and the impact of mid-year changes on expected outcomes.

2. Include in the change approval process and rubric a review of expected changes to local outcomes.

3. Document the most time-consuming technical difficulties for High School Success program staff and recipients and create a plan to minimize them.

4. Develop goals, targets, timelines, and data measures for the High School Success program in the final internal program evaluation plan.

5. Use data from ODE and from site visits in higher-level analyses to further program and equity goals and to align with larger ODE initiatives.

Objective, Scope, and Methodology

Objective

This audit was required by Measure 98, which called for financial and performance audits of the program every two years. The Oregon Audits Division released a financial audit of the program in May 2020.

The objective of this performance audit was to determine whether ODE has sufficient processes to ensure that:

- The agency can provide sufficient support for districts through their planning process.
- Adjustments to district plans after initial approval do not negatively affect expected district outcomes.
- The agency is able to determine whether districts are operating according to the equity lens.

Scope

This audit was a review of ODE's process used to approve districts High School Success plans for statutory compliance, including examining a sample of approved plans, and a review of ODE's system for monitoring the use of funds and analyzing district outcomes for overall effectiveness and equity. We excluded activities that occurred after the Governor issued a stay-at-home order on March 23, 2020. In deference to the increased burden in response to COVID-19, our audit does not rely on interviews with, or information requested from, schools or districts that ODE does not already collect.

Methodology

To address our objectives, we used a methodology that included, but was not limited to: conducting interviews, analyzing educational data, reviewing documentation and evaluating the effectiveness of internal controls.

Within ODE, we met with the Chief of Staff, an assistant superintendent, the Director of the High School Success team, education program specialists, and research and policy analysts. We also conducted interviews with state legislators. To learn about the views, opinions, and perspectives of stakeholders, we interviewed representatives from Stand for Children, the Oregon Education Association, the NAACP of Eugene and Springfield, and the Chalkboard Project.

We assessed internal controls significant to the audit objective surrounding implementation of the Measure 98 by reviewing federal laws, Oregon state laws, ODE's policies, procedures, and administrative rules, and previous audit reports. We reviewed types of equity data collected and used in other states. We also requested and analyzed education data, planning and monitoring documentation, and guidance documentation from ODE.

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

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

December 10, 2020

Kip Memmott, Director

Secretary of State, Audits Division

255 Capitol St. NE, Suite 500

Salem, OR 97310

Dear Mr. Memmott,

This letter provides a written response to the Audits Division's final draft audit report titled: High School Success Planning is Robust, but ODE Can Enhance Benefits of Measure 98 by Improving Monitoring and Analysis.

Thank you for highlighting the important work under way at the Oregon Department of Education (ODE) to improve graduation rates, increase 9th grade on-track rates, and improve college and career readiness across the state. The recommendations offered will aid in our continuous improvement efforts and increase our effectiveness as we partner with High School Success recipients to help more students on their path to graduation and beyond.

We appreciate that the Audits Division staff spent time on this topic, raised issues, and provided thoughtful recommendations to further our work. Many of the themes in the audit are consistent with what we have identified, and we look forward to acting on the recommendations to move our work forward.

Additionally, ODE has focused, and will continue to focus, on opportunity gaps evident in the data.

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

RECOMMENDATION 1

> Include in the annual expenditure review process, and in future plan development and approval processes, a review of past planned and actual expenditures, and the impact of mid-year changes on expected outcomes.

Agree or Disagree with Recommendation	Target date to complete implementation activities	Name and phone number of specific point of contact for implementation
Agree	December 31, 2021	Maggie Mashia maggie.mahshia@ode.state.or.us

Narrative for Recommendation 1

As part of our continuous improvement process, the High School Success team will refine annual expenditure reviews processes and plan development/approval processes to include a review of past planned vs. actual expenditures, as well as an analysis of the impact of mid-year changes on expected outcomes. In order to respond to this recommendation, we will add specific and intentional steps in both processes to ensure analysis of the impact on expected outcomes is done both internally as a whole, as well as externally with our recipients.

RECOMMENDATION 2		
Include in the change approval process and rubric a review of expected changes to local outcomes.		
Agree or Disagree with Recommendation	**Target date to complete implementation activities**	**Name and phone number of specific point of contact for implementation**
Agree	August 31, 2021	Maggie Mashia maggie.mahshia@ode.state.or.us

Narrative for Recommendation 2

Building on our current processes and an existing rubric, the High School Success team will add intentional steps and questions to review expected changes to local outcomes when recipients request to change their plan and budget.

RECOMMENDATION 3

> Document the most time-consuming technical difficulties for High School Success program staff and recipients and create a plan to minimize them.

Agree or Disagree with Recommendation	Target date to complete implementation activities	Name and phone number of specific point of contact for implementation
Agree	June 30, 2021	Maggie Mashia maggie.mahshia@ode.state.or.us

Narrative for Recommendation 3

The High School Success program staff will document technical issues experienced throughout the biennial cycle (planning, expenditure report reviews, grant management responsibilities, site visits, monitoring experiences, etc). Once documentation is complete, the program staff will analyze the data to determine which of these technical difficulties are the most time-consuming. Then, the program staff will explore options and will submit a plan of resolution to the Assistant Superintendent of the Office of Education Innovation and Improvement

RECOMMENDATION 4

> Develop goals, targets, timelines, and data measures for the High School Success program in the final internal program evaluation plan.

Agree or Disagree with Recommendation	Target date to complete implementation activities	Name and phone number of specific point of contact for implementation
Agree	December 31, 2020	Maggie Mashia maggie.mahshia@ode.state.or.us

Narrative for Recommendation 4

The High School Success program staff will document internal performance measures. Once finalized, we will share those measures with appropriate agency staff. In addition to internal performance measures, the HSS team has publicly released Eligibility Requirement Guidance and further outlined expectations for HSS grant recipients since the time of this audit.

RECOMMENDATION 5		
Use data from ODE and from site visits in higher-level analyses to further program and equity goals and to align with larger ODE initiatives.		
Agree or Disagree with Recommendation	**Target date to complete implementation activities**	**Name and phone number of specific point of contact for implementation**
Agree	August 31, 2021	Maggie Mashia maggie.mahshia@ode.state.or.us

Narrative for Recommendation 5

The High School Success team has begun work to align this program with other ODE initiatives. We plan to use data collected in the program to guide us in developing and implementing program and equity goals.

Please contact Scott Nine at (503) 947-0612 with any questions.

Sincerely,

Colt Gill
Deputy Superintendent of Public Instruction
Director of the Oregon Department of Education

About the Secretary of State Audits Division

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

This report is intended to promote the best possible management of public resources.
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sos.oregon.gov/audits