

STUDENT INVESTMENT ACCOUNT

A REPORT ON PROGRESS AND IMPLEMENTATION

March 2021



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DEPARTMENT OF
EDUCATION

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EXECUTIVE SUMMARY

During the 2019 legislative session, Oregon's leaders made a significant commitment to our children, our educators, our schools and our state with the passage of the [Student Success Act \(SSA\) ORS 327.175](#). The SSA was anticipated to bolster K-12 and early learning funding by \$1 billion each year. Of those funds, \$200 million was placed into the State School Fund and the remaining was planned for distribution into three accounts: the Early Learning Account, the Student Investment Account and the Statewide Education Initiatives Account.

Economic Impact due to the COVID-19 Pandemic

The SIA was to receive at least 50% - a projected total of \$472,740,000 - of the funds collected and deposited in the Fund for Student Success. However, as a direct result of the economic impacts the COVID-19 pandemic has had on the established Corporate Activity Tax, the main revenue generator for the Student Success Act, the amount deposited into the Student Investment Account was significantly reduced to a total of \$150 million.

To best support SIA applicants amid the COVID-19 health crisis, the Oregon Department of Education (ODE) shifted its approach.

ODE Actions to Support Applicants:

- Allowing applicants to submit a partial (or incomplete) application by April 15, 2020.
- Canceling the Quality Assurance and Learning Panels (QALP) for the 2020 year. The QALP were originally designed to be composed of community members, students, families, advocates, ESD staff, retired and current educators, and business leaders as described in the [December 2019 SIA Guidance](#).
- Redirecting energy to providing tools, guidance and support for school districts to hold effective virtual school board meetings that meaningfully allow for public comment and engagement in approving SIA applications and plans, meeting the requirements in the law.

There was a significant administrative pause placed on the hiring of SIA staff at the Oregon Department of Education while the Legislature and Governor determined how to respond to the economic impacts of COVID-19. As a result, of the 29 new positions originally budgeted for ODE to implement the Student Investment Account, was reduced to 21 new positions. Overall, 14 staff have been hired as of February 2021.

Legislative Actions to Support Applicants:

- **Release of Longitudinal Performance Growth Targets (LPGTs):** In the August 2020 special session, the Legislature created increased flexibility for the administration of the SIA in [Section 70 of HB 4304](#), which released all SIA applicants from needing to develop or track LPGTs for one year only due to limitations on data collections as a result of COVID-19. The bill named that ODE could develop other applicable performance growth targets and indicators of performance.
- **Amended Grant Application and Agreement Process:** The Legislature provided ODE with the flexibility to determine the process for plan and grant agreement amendments. The State Board of Education adopted [2020-21 SIA Amended Grant Application and Grant Agreement](#) temporary rules (581-014-0006) on 10/01/2020. These temporary rules are in effect through 03/28/2021.
- **Prioritization of Mental and Behavioral Health:** Additionally, the Legislature encouraged the prioritization of SIA funds to be used to address student mental and behavioral health needs, though the allowable use areas were not formally narrowed. Applicants needing ideas or support were encouraged to utilize the [Centering Mental and Behavioral Health resource](#) released in conjunction with the Oregon Health Authority in January 2020.

INSIGHTS FOR CONSIDERATION EARLY INTO IMPLEMENTATION

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

1. ***The promise of the law remains.*** There is a widespread sense that the two-years of listening done by the Joint Committee for Student Success was important and led to legislation that holds real promise of educational change in Oregon. The law embeds key principles of authentic community engagement, attention to focal students along with families and staff, and it puts the application of an equity lens in relationship to strategic planning focused on student well-being and solving long-standing academic disparities.
2. ***Trust is earned and the promise of the law offers the potential for broken promises.*** A school district operating in good faith engages hundreds of students, families, and staff in new ways but hasn't fully digested its changed financial situation. Add a pause and the complexity of COVID-19 and just as the community had named and seen priorities elevated they feel lost and confused as funding is changed and directed, all in ways that are allowable by category and within the scope of the plan.
3. ***Accountability in relationships and follow-through.*** The law changes what districts and schools can and should focus on and creates new ways to relate to community, ESDs, and ODE. There are positive early signs of these changes coming to life.
4. ***Goals of increased "knowledge mobilization" and "networked learning" are important and are mostly in front of us with some early signs***

of positive capacity building through ESDs.

Written about in the prior legislative update and in the December 2019 SIA guidance, one of the hallmarks of generative educational systems change is increasing the culture and rate of professional sharing and learning so that key innovations in one context are digested (not simplistically replicated) in another. The majority of the technical assistance and field building work designed into the SIA is about to begin and this is a key area of opportunity. One of the areas of significant opportunity is in offering new theories and practices for monitoring and evaluating impact and progress towards educational outcomes at multiple levels in the educational system.

5. ***Consolidation and coherence across state and federal funding streams and programs is essential to support quality implementation.*** In the same way the Joint Committee on Student Success toured Oregon, it may be a good time for an implementation tour to get into the details that come from understanding the barriers and challenges presented by there being more than 88 distinct state programs in addition to federal programs in addition to COVID-19 impacts and priorities. One of the best ways to build support and deep implementation is to take fragmentation and the administrative burden districts experience out of the equation. ODE staff have done work to map these challenges and begin to make changes in internal operations. There is significant room for improvement without additional legislation. That said, before any new programs are designed, it would be ideal to consider what else can be done in statute to support this goal while keeping districts focused on the important work enshrined in the SIA and other Student Success Act programs and priorities.

OVERVIEW OF THE STUDENT INVESTMENT ACCOUNT (SIA)

STUDENT INVESTMENT ACCOUNT

The SIA is a non-competitive grant available to all Oregon school districts and eligible charter schools, established for two purposes: (1) meeting students' mental or behavioral health needs and (2) improving academic outcomes and reducing academic disparities for students of color, students who are tribal citizens, students with disabilities, emerging bilingual students, and students navigating poverty, homelessness, and foster care.

The Student Investments Account grants give districts and eligible charter schools wide latitude in determining through the engagement process how best to use the allocated funds to improve outcomes for students as long as the use falls within one of the described allowable use categories.

The SIA allowable use categories are noted below with examples of how applicants may use the funds:

1. **Increased Instructional Time**
 - Increase hours or days of instructional time;
 - Add summer programs and/or before and after school programs.
2. **Improving Student Health and Safety**
 - Invest in social-emotional learning and development, student mental and behavioral health;
 - Improvements to teaching and learning practices or organizational structures that lead to better interpersonal relationships at school;
 - Student health and wellness, trauma informed practices, school health professionals, or facility improvements that improve student health or safety.

3. Reducing Class Size

- Increase the use of instructional assistants, educators, and counselors;
- Use evidence-based criteria to ensure appropriate student-teacher ratios or staff caseloads.

4. Well Rounded Education

- Include developmentally appropriate and culturally responsive programs;
- Broaden curricular options at all grade levels (including access to art, music, PE, science, etc.);
- Increase access to educators with a library media endorsement.

Grant recipients are also allowed to spend a small portion of funding on ongoing community engagement activities and administrative costs.

At the heart of the SSA is a commitment to improving access and opportunities for students who have been historically underserved in the education system.

To receive funding, applicants needed to comply with application requirements set forth in the [Student Success Act](#) and informed by the [Guidance for Eligible Applicants](#) provided by ODE in December 2019, which included focused community and student engagement, use of an equity lens, alignment to the district continuous improvement plan, consideration of relevant data, and consideration of the recommendations of the state's [Quality Education Model Report](#).

Monitoring & Evaluation Framework

Public approval and accountability processes are a core component built into the SIA statute. A singular set of progress markers have been developed for the 2020-21 school year, integrating the kinds of changes ODE believes could advance each of the common metrics in the SIA long-term. The progress markers are a mechanism to support a developmental approach to evaluation with a focus on learning about the kinds of changes that happen from distinct investments.

Required for all Applicants

Beginning in January 2021 and continuing approximately each quarter thereafter, SIA grant recipients are required to submit programmatic and financial progress reports to ODE. In the programmatic progress report, recipients will detail their progress on SIA plan activities and the kinds of changes that are unfolding. Within the financial progress report, grantees will share their progress on spending SIA funds and account for any adjustments they've made to the original plan in light of the reduction in funding.

SIA grant recipients are also required to review their progress on an annual basis through a cumulative progress report and a municipal audit. The annual progress review will ask grantees to review their implementation efforts, progress with any local metrics that were established in the grant development process, review how their strategies worked (or didn't), and work with ODE to substantiate changes within progress markers. Under Section 15 of the Act, SIA grant recipients are required annually to conduct a financial audit of the use of grant moneys in accordance with the Municipal Audit Law. Both the annual progress report and annual municipal audit must be made available in the main office and posted on the grantee's website; presented to the governing body of the grantee at an open meeting with the opportunity for public comment; and submitted to ODE.

SIA plan development community engagement at Forest Grove School District.



SIA PROGRESS REPORT

Submission of SIA Applications

ODE received a total of 208 SIA applications, out of a total possible number of 210, from districts and eligible charter schools across the state by the April 15, 2020 deadline.

As part of their application, districts and eligible charter schools were required to submit a detailed budget outlining their budgeted activities for year 1 and denoting the relevant allowable use category. Based on a review of the submitted budgets before the August 2020 reduction in funding¹, applicants planned to allocate:

- 36.1% of funds to Improving Student Health and Safety,
- 27.1% to Reducing Class Size,
- 25.7% to Well Rounded Education, and
- Less than 5% each to the other allowable use categories (increasing instructional time, ongoing community engagement, administrative costs).

Eligible applicants were given the opportunity to adjust or amend their original SIA plan in light of the reduction in funding. When SIA applicants needed to make major changes to their planned strategies and/or outcomes then they were required to submit three items to ODE:

- an updated SIA plan,
- updated budget, and
- board meeting minutes, showing the opportunity for public comment and approval of the amended plan.

Community Engagement and Equity Lens

The Student Investment Account is centered on a commitment to equity and community engagement. Applicants were required as part of the application process to utilize an equity lens to guide both their community engagement as well as their planning and decision-making. Overall, over 40% of applicants used the [Oregon Equity Lens](#) adopted by the ODE. Other districts used a variety of Equity Lens tools such as ESD developed tools or lenses they developed independently. Applicants were also required to engage in authentic and meaningful community engagement with focal student groups and their families as well as the larger community as part of creating their SIA Plan.

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

¹ The majority of SIA grantees adjusted their planned activities and expenditures due to the reduction in funding. Grant recipients were asked to report these adjustments to ODE in the first progress report due by January 31, 2021. As a result, the percentages below are based on the original budgets submitted and do not reflect adjustments. ODE will have a better sense of the actual percentages by allowable use area after reviewing the first progress report.



SIA plan development community engagement at Warrenton-Hammond School District.

In addition to surveying all students about how SIA funds should be utilized, a district dedicated time to conducting empathy interviews with students from the identified focal groups. Students were paired with staff they already had a relationship with at their school, so they would feel comfortable sharing their ideas and honest feedback about their school experience.

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

SIA Plan Updates for the 2021-23 Biennium

SIA grant recipients will need to update ODE on how they will make adjustments or amendments in executing their existing three-year plans and applications for the 2021-23 funding cycle. This updated submission process will allow grant recipients to provide ODE with a streamlined set of essential information including the new budget, narrative information on the use of an equity lens analysis as well as information on current community engagement processes. Grant recipients must submit an updated SIA plan adjustment or amendment during the window of May 1 - June 30, 2021. A preview of the SIA plan adjustment/amendment submission requirements is included within the [supplemental guidance](#).



SIA plan development community engagement at Bethel School District.

WORK COMPLETED BY ODE STAFF

Comprehensive Application Review

The review process involved 48 staff members from across the Oregon Department of Education who, after receiving training, worked in pairs to review each application. Attention was given to teaming ODE reviewers who bring a diversity of lived and professional experience. In addition to the reviewers, each application was assigned an ODE designated application manager to steward the application through both the review process and grant agreement process.

ODE staff conducted a comprehensive evaluation of the application to ensure

1. application completion;
2. legal sufficiency; and
3. clearly defined use of funds that meet the intent of the law.

The initial step for application review was completed by ODE staff reviewers, who were trained to review and evaluate plans according to the evaluation criteria and overall SIA guidance.

ODE Reviewers made an assessment using the evaluation criteria.

1. **Meet Requirements** – The application was determined to meet all requirements and was ready to move forward to the grant agreement Process with no additional information.
2. **Meet Requirements with Small Changes** – The application mostly met requirements, but needed some additional information or materials to fully meet requirements. Examples of small changes included re-submitting the budget using the required budget template or minimal addition of narrative to support the application. Once the additional information was submitted and approved, the applicant then moved into the grant

agreement process.

3. **Needs Additional Review** – The application was recommended to be sent to the Additional Review Team for another review. The Additional Review Team would review the application as well as the ODE reviewer's joint assessment before making a final assessment - meets requirements, meets requirements with small changes, or does not meet requirements and needs major changes. Next steps and follow-up was dependent on the final assessment.
4. **Does Not Meet Requirements, Needs Major Changes** – The application did not meet the requirements and required substantial changes to be made prior to moving forward in the process. Applicants falling into this category were invited to have a call with ODE to discuss the changes and additional information that would need to be submitted in order to meet application requirements. Examples of major changes included submitting missing documents such as community engagement artifacts or substantial additions to narrative portions of the application. Once the additional information was submitted and approved, the applicant then moved into the grant agreement process.

TECHNICAL ASSISTANCE AND COACHING PROGRAMS

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

Intervention and Strengthening Program (ISP)

The *Intervention and Strengthening Program (ISP)* is the general coaching program outlined for grant recipients who do not meet LPGTs, which ODE is expected to monitor annually. If a grant recipient does not meet LPGTs the grant recipient may submit an explanation for the reasons why the LPGTs were not met. After taking into consideration the explanation submitted by the grant recipient, ODE may require the grant recipient to enter into the ISP. If required, participation in the coaching program must be for at least one year, unless the department allows for a shorter period of time.

Under the program, the department shall advise and counsel grant recipients on how to meet LPGTs and shall assist grant recipients with ongoing professional development and peer collaboration. The act does provide ODE the ability to direct the expenditure of SIA funds as the strongest form of intervention within this program. The earliest engagement with grant recipients under this program is anticipated for Summer and Fall of 2022, given the release of the LPGTs for the 2020-21 school year. The ISP program is for districts, charter schools they sponsor in the SIA application, and charter schools that have applied and are receiving SIA funds independently. For the 2020-21 school year, the funding for general technical assistance and coaching was reduced from \$4,531,000 to just over \$811,000.

Intensive Coaching Program (ICP)

An *Intensive Coaching Program (ICP)* is established for school districts with the highest need for coaching, support, and intervention. This intensive program is invitational and only school districts are eligible. The ICP requires at least four years of participation. Districts that agree to participate are eligible for additional funding from the Statewide Education Initiatives Account (SEIA). A total of \$12 million is included in the Grant-in-Aid section of the SEIA for the additional funding for these districts; however, this was reduced to \$4 million in the August 2020 special session. ODE will initiate conversations with the first districts invited to participate, with the formal coaching program planned to start in Fall 2021.

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

The ICP will utilize Student Success Teams (SST) as outlined in the Act. Each SST will include individuals internal and external to the district - the superintendent, a board member, a teacher, an ODE point person, and three stewards who will support the district in leadership, teaching and learning, and community outreach and advocacy. SST provide advice and counsel on how to work collaboratively with the community, sovereign nations, and other stakeholders to improve performance outcomes and develop recommendations for meeting LPGTs. As part of the SST, teams will have expertise in school and school district improvement strategies and will primarily be contracted staff, some with local perspectives regarding the district they are assisting.

Impact of Education Service Districts (ESDs) Liaisons

Section 25 of the [Student Success Act](#) describes and HB 5047 authorized ODE to disburse up to \$24 million for use by ESDs to provide technical assistance to school districts in their region to support SIA application development and early implementation as well as supporting coordination between districts and ODE. During the August 2020 special session, the funding for ESD Technical Assistance was reduced to \$20 million.

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

“The SIA work continues to drive our mission of equity to be at the forefront of all decision-making.”

“The biggest impact has been in the way we engage with - and listen to - the families we serve. We have conducted more empathy interviews than ever before and are directly integrating the insights and learnings from these interactions into our Strategic Plan.”



SIA plan development community engagement at Crook County School District.



SIA plan development community engagement at Forest Grove School District.

REFERENCES

Oregon Administrative Rules

At present, the State Board of Education has adopted the following permanent rules

- [Definitions for Student Investment Account](#) (581-014-0001) adopted 03/20/20
- [Fund Administration for Student Investment Account](#) (581-014-0004) adopted 03/20/20
- [Charter School Eligibility for Student Investment Account](#) (581-014-0007) adopted 03/20/20
- [Definitions for Student Investment Account: Third Grade Reading Proficiency](#) (581-014-9999) adopted 12/16/19
- [Intensive Program & Student Success Teams: Definitions](#) (581-017-0729) adopted 1/28/21
- [Intensive Program & Student Success Teams: Purpose](#) (581-017-0732) adopted 1/28/21
- [Intensive Program & Student Success Teams: Eligibility](#) (581-017-0735) adopted 1/28/21
- [Intensive Program & Student Success Teams: Criteria, Agreement, and Establishing Improvement](#) (581-017-0738) adopted 1/28/21
- [Intensive Program & Student Success Teams: Funding](#) (581-017-0741) adopted 1/28/21
- [Intensive Program & Student Success Teams: Reporting](#) (581-017-0744) adopted 1/28/21

In June 2021, the State Board of Education is scheduled to adopt permanent rules for:

- Performance and Financial Audit for Student Investment Account



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