

Audit Committee recommendations on Secretary of State Audit follow-up

Background Information:

- SoS report issued January 2019:

Link to report:

<https://www.pps.net/cms/lib/OR01913224/Centricity/Domain/219/SOS%20Audit%20Report%20January%202019.pdf>

- SoS requested the status of the implementation of the recommendations in December 2020

Link to District response:

<https://meetings.boardbook.org/Documents/FileViewerOrPublic/915?file=c26a09e0-98e6-49bb-bc1e-bdd16baaa00f&isFromMeeting=True>

Link to Board Recommendation 26 response:

<https://meetings.boardbook.org/Documents/FileViewerOrPublic/915?file=f458bf7d-e4a6-40f9-b91d-34ac76b6e3c5&isFromMeeting=True>

- SoS auditors have reviewed the information the District provided related to the status of the implementation of the recommendations and have provided the District will follow up questions

Link to District Response:

<https://meetings.boardbook.org/Documents/FileViewerOrPublic/915?file=aebc3feb-1608-4d92-a9a4-ee0db88a79b0&isFromMeeting=True>

- Board Recommendation 26 a-f question from SoS Auditor are listed below

Color key: Black is SoS Auditor initial recommendation and follow up questions

Red is Audit Committee Chair Initial Comment

Green is Staff Response to Initial AC Chair Comment

Purple is AC Chair concluding comment and recommendation to Audit Committee

SoS Recommendation: 26a (Board) Building an effective common core curriculum based on state standards and ensuring adequate school support and accountability for performance.

Follow up questions from SoS Auditor and the PPS Response:

1. What is status of GVC? i.e. what has been implemented, what is under development, and what is set for future development?

Portions of the GVC have been presented to the Board; see below. Not all subjects and all grade level curriculum have been presented to the Board.

2. Have GVCs for Language Arts, Math, Health, and Science been completed? No recent report from staff.

3. At this point, the evidence suggests that the board discussed or was briefed on climate justice, dyslexia, and Ethnic/Native Studies. Has the board or a subcommittee discussed feedback and further development of GVC after the initial scope and sequence for Language Arts, Math, Health, and Science? Has the board received reports with data and feedback of implementation in classrooms? Is the district tracking the feedback?

The PPS GVC includes comprehensive standards-based scope and sequences, recommended instructional units with high-leverage instructional practices, differentiated teaching strategies (e.g. TAG, ESL, AVID) and rigorous tasks for students with diverse learning needs and aligned physical & digital instructional materials across all content areas PK-12 (including core content like Language Arts, Math, Science and SEL). Presentations or memos with updates on development and implementation include:

- 1/7/20: [District 22 Report](#) (Update on TAG, Materials Adoption, Media Specialists/Library)
- 2/21/20: [Climate Change Social Justice Update](#)
- 5/26/20 Superintendent's Strategic Plan Priorities: [Shift D](#)
- 6/11/21: [MTSS Presentation](#)
- 7/14/20: Educational & Facility Improvement Summary: [Curriculum](#)
- 8/22/20: [Climate Change/Justice Curriculum](#)
- 10/20/20: [Dyslexia & Foundational Literacy Skills](#)
- 11/17/20: [Ethnic Studies & Tribal History](#)
- 12/15/20: [Health Education](#)
- 3/1/21: [Social Emotional Learning Curriculum](#)
- 4/27/21: [Middle School Science Curriculum Adoption](#)

No evidence has been presented to the board on district tracking of feedback.

Recommendation from ACC to AC: Staff provide the Board with a comprehensive written report outlining the status of all subjects/all grades in terms of development and implementation AND any data and feedback on the implementation of the GVC in the classroom.

Any additional information on the status of implementation of or feedback received for a particular content area or grade level can be provided upon request. **Recommendation from ACC to AC:** ACC requests staff provide the Board the status of implementation of or feedback in all content areas or grade levels, per the request above. .

4. Has the district implemented the comprehensive assessment system referred to in PPS's response to the initial audit, or what is the schedule for it if not? Has the board and/or a subcommittee been briefed on the status and/or received data reports from the new system? Please send links if so. **Staff: please explain what is being referenced in terms of a comprehensive assessment that is measuring growth and proficiency? Please indicate when this was shared with the Board other than the most recent MAPs presentation at the April 2021 board meeting.** A comprehensive assessment system is a system of assessment tools, varying in purpose, that are used to measure, monitor, and verify student learning. The Oregon Statewide Assessment System is the annual summative assessment. MAP Growth is the interim assessment tool to measure growth over time in English Language Arts and

Math. Diagnostic assessments vary across content area and grade level, but are often curriculum-embedded and can be found within units in the GVC. Finally, teacher teams may modify assessments in the GVC or create their own formative assessments to verify student learning on specific learning objectives. As shared in the July 28, 2020 [Board Goals presentation](#), state and local assessments for the 19/20 school year were effectively canceled and therefore, no new data were available to share until the most recent assessment window (which was shared at the April 2021 board meeting). **Recommendation from ACC to AC:** In the original district audit on p. 24 of 32, third paragraph, it states "a comprehensive assessment system that measures student growth and progress over time is being implemented." Staff should provide the Board with this assessment tool. Board should also request a dashboard of 2019-20; 2020-21 of the Board goals related to growth and with the added proficiency data at the designated 3rd, 5th, 8th, and 12th grade. When SBAC is cancelled, note that in the dashboard or, if relevant, provide interim MAPs data. The 2019-20 high school data is not SBAC or MAPS and should be available and presented to the Board; 2020-2021 high school data to be provided to the Board when available.

SoS Recommendation: 26b (Board) Developing a strategic plan that focuses on long-term investment and measurement of results. The plan should also address the district's organizational culture, including improving the district's feedback loops and trust between central administrators, principals and teachers.

Follow up questions from SoS Auditor and the PPS Response:

1. Has the strategic plan been presented to board yet? Per response, strategic plan was scheduled to have been presented to board in February 2021, but appears it was not. **Portions of an emergent strategic plan have been shared, but a completed strategic plan with strategies, action items, and metrics has not been presented to the board.** The Strategic Plan was postponed due to the reopening of schools into Hybrid. The board will be invited for small group introduction and opportunity for input in late May 2021 and the final version will be shared in with the Board at the June 15, 2021 Board Meeting.
2. Response also links to monthly PAT meetings and school climate survey, though not to board presentations on these subjects. Have the board and/or board subcommittees discussed development of stronger feedback loops? If so, please provide links to the pertinent meetings and briefing documents. **No, the board has not scheduled a discussion of this. There is not a subcommittee that would have this within this jurisdiction; this is a content area that would require the Board as a whole discussion.** Board members were provided access to and invited for small group introduction to the use of the Panorama Dashboard in June 2019 and May 2021. The board was provided a [memo](#) and [update](#) in June 2020. **ACC to AC: Recommendation:** Access is only available after the training and all the training has not yet been completed for Board members. Provide the Board with visibility to the feedback loops from principals on building and district climate and central office supports for schools. Staff explain how the broader community will have access to the Panorama Dashboard and information on school and district climate as the small group

introduction is not a public meeting. Staff describe what information is collected and provided on overall district climate and school feedback on central office support for school. Provide the Board with a written report on presentation at a Board meeting.

SoS Recommendation: 26c (Board) Addressing inequities at high-poverty schools, such as high turnover, low teacher experience, and initiative overload.

Follow up questions from SoS Auditor and the PPS Response:

1. Has the board discussed turnover, low teacher experience, and initiative overload at high-poverty schools or received data on these subjects?. If yes, please link to the board and/or subcommittee meetings and briefing documents. **No, this has not been on the Board's or any subcommittee meeting agenda. And, no report has been provided to the Board with data and evidence that shows the results of actions taken by the district to address turnover, low teacher experience, and initiative overload at high poverty schools. No further response. ACC recommendation to AC:** Staff provide a matrix with years in position/school for each school leader (principal, AP, VP) for all TSI, CSI, and Title 1 schools. Sample of charter below.

	2019-20 Principal (# of years in position; # of years as a principal)	2019-20 AP (# of years in position, # of years as a AP)	2020-21 Principal (# of years in position, # of years as a principal)	2020-21 Principal (# of years in position, # of years as an AP)	2020-21 Average teacher experience
Vernon					
Rigler					

Provide a report on initiatives that have been reduced or eliminated to address initiative overload by school or school level or explain district rationale for current state.

2. Did the updates described in the original PPS response to the audit, copied below, occur? If yes, please link to documents. - The Board supports these efforts to stabilize the teaching corps, improve the climate in struggling schools, and benefit students, and will be receiving regular reports from District staff on progress being made or remaining challenges. **Staff: please provide links to the regular reports and accompanying evidence that were made to the board on these topics.** In the Board Executive Session on May 11, 2021 and then in a public PAT bargaining session streamed on YouTube on May 12, 2021, the concept of Zone/Acceleration Schools was introduced. **ACC to AC recommendation:** Seek clarification from staff that no regular reports occurred before May 11, 2021. Staff post the briefing memo that describes how a Zone/Acceleration School would address efforts to stabilize the

teaching corps, improve the climate in struggling schools, and benefit students in all TSI, CSI, or Title schools. Staff needs to describe how the timing and sequence would work for all designated schools to participate in this initiative (A bargaining session video is not a substitute for a public facing briefing document.)

https://docs.google.com/presentation/d/1uIR2_67FmM5i9k1QifcQ756JGMivSTTcBcFTf9mpcTw/edit#slide=id.gae4dc3182b_0_63

3. Was the board briefed on the Audit Action Plan, as described in original response below? If yes, please link to meetings and documents: - District's Audit Action Plan will include a schedule for staff reporting to the Board on these initiatives, critical milestones, and a student-centered scorecard. The Board Audit Committee, in consultation with staff, will define its role related to oversight, accountability, budget support and policy development in these initiatives. **The Board Audit Committee has received regular reports on district activities related to the implementation of the recommendations and a scorecard has been developed in conjunction with staff and the Audit Committee.** [Scorecard - https://www.pps.net/cms/lib/OR01913224/Centricity/Domain/219/SoS%20Response%20tracking%20with%20Date%20of%20Presentation%20for%20website%20.pdf](#) **The Audit Committee co-created the scorecard to track the status of the recommendations. However, oversight accountability for curriculum/student/school performance and other non-audit related activities, and budget support for those activities and initiatives are the responsibility of the Board as a whole and to date, there has not been an extensive Board discussion on these topics. Policy development is the responsibility of the Board Policy Committee. The Policy Committee has developed the following policies specifically in response to the SoS recommendations: (staff to add) 2.10.015-P Anti-Racist & Anti-Oppression Learning Communities** <https://www.pps.net/cms/lib/OR01913224/Centricity/Domain/4814/2.10.015-P.pdf> **Draft Student Conduct & Discipline Policy (4.30.010-P) Staff Report** https://www.pps.net/cms/lib/OR01913224/Centricity/Domain/219/Student%20conduct%20and%20discipline%20policy_Staff%20report%20and%20engagement%2020_03_09.pdf **Draft Student Conduct & Discipline Policy (4.30.010-P)** https://www.pps.net/cms/lib/OR01913224/Centricity/Domain/219/Student%20Conduct%20and%20Discipline%20policy%20draft_all%20pages_with%20comments.pdf **The Draft Student Conduct & Discipline Policy has been presented to the Board Policy Committee and a request to bargain was received from PAT - an MOU was discussed in open bargaining session on May 12, 2021 to establish a work group to create a proposal for bargaining to address the Student Conduct and Discipline Policy concerns. Both the District and PAT are committed to completing this bargaining session in this school year. This topic was discussed in Board Executive Session on May 11, 2021.**

SoS Recommendation: 26d (Board) Improving the transparency and impact of the district's budget, including objective peer comparisons, analysis of results, and analysis of potential savings areas.

Follow up questions from SoS Auditor and the PPS Response:

1. Has the board or a subcommittee seen or acted on information provided by PPS regarding analysis of performance and analysis of potential savings areas? If so please provide links or documents. **The Board has not received an analysis of performance relating to objective peer comparisons of our budget and board budget presentation materials have been made available to the community and Board members the day of the Budget meeting. No analysis of potential savings areas (ask staff for any evidence of this).** The board received a budget benchmarking report on November 17, 2020.
https://drive.google.com/file/d/1VBijaHX_AgQYJuqjy_qJ7_1V_mJqkpsb/view The board and CBRC received and discussed the SIA investments aligned to the strategic plan and the first analysis of the progress made with the funding in March 2021. Meeting materials are here: <https://meetings.boardbook.org/Public/Agenda/915?meeting=459416> There are monthly Community Budget Review Committee meetings with board representation live streamed on YouTube for public viewing. <https://www.youtube.com/user/ppskomms/featured> CBRC delivered their budget review report to the board on May 11, 2021 and can be found here: <https://meetings.boardbook.org/Public/Agenda/915?meeting=467948>.

ACC to AC recommendation: Request staff provide the Board with the written analysis for potential savings areas in the 2021-22 budget. Benchmarking reports should be presented to the Board with the budget as a tool to make comparisons across districts and there should be an analysis of potential savings or budget categories where PPS is an outlier.
Note: presentations to CBRC are not a substitute for Board presentations.

SoS Recommendation: 26e (Board) Tracking and addressing teacher and principal issues with student discipline practices and priorities.

Follow up questions from SoS Auditor and the PPS Response:

1. The response notes that evidence of tracking is found on p. 30 of a document presented to the board in June 2019 (see text below), but we can't find that document. Can you provide it and specify the date it was presented to the board? **(Staff provide the date it was presented and the link.)**
2. Evidence to demonstrate that the school district administration has prioritized key steps to track and address teacher and principal issues with student discipline practices. Evidence that the board received the staff report "on the implementation and impact of the new Behavior Collaboration Team no later than June 2019 (p. 30) **(Staff provide the date it was shared or presented to the Board and the links to the evidence.)** The Board Policy Committee spent a significant amount of time updating the Student Conduct and Discipline Policy, which the Portland Association of Teachers have demanded to bargain. Bargaining on a new contract began May 5, 2021. **(Staff provide update on PPS bargaining position.)**

Draft Student Conduct & Discipline Policy (4.30.010-P) Staff Report

https://www.pps.net/cms/lib/OR01913224/Centricity/Domain/219/Student%20conduct%20and%20discipline%20policy_Staff%20report%20and%20engagment%2020_03_09.pdf.

Draft Student Conduct & Discipline Policy (4.30.010-P)

https://www.pps.net/cms/lib/OR01913224/Centricity/Domain/219/Student%20Conduct%20and%20Discipline%20policy%20draft_all%20pages_with%20comments.pdf

The Draft Student Conduct & Discipline Policy has been presented to the Board Policy Committee and a request to bargain was received from PAT - an MOU was discussed in open bargaining session on May 12, 2021 to establish a work group to create a proposal for bargaining to address the Student Conduct and Discipline Policy concerns. Both the District and PAT are committed to completing this bargaining session in this school year. This topic was discussed in Board Executive Session on May 11, 2021. **Staff provide evidence that the board received the staff report "on the implementation and impact of the new Behavior Collaboration Team. ACC to AC recommendation: Staff response needed to this question and describe what happened to the Behavior Collaboration Team. Share whether it met and when, what was learned, as well as what has replaced it.**

3. Is the district monitoring progress on student conduct, including annual reporting to the district in a manner that is transparent and accessible to administrators, teachers, and the general public as specified in the conduct policy? If so, please provide evidence that the annual reporting is occurring. **Staff provide the link.**
District Discipline Data can be found here: <https://www.pps.net/Page/2075>
4. The 2020-21 budget does not appear to include data and suspensions and expulsions by race/ethnicity over time, though it was included in prior budgets. Is this data being collected and reported elsewhere? If yes, please provide documentation. **Staff provide link to data that was made available to the board and the public.**
District Discipline Data can be found here: <https://www.pps.net/Page/2075>
5. Is the district tracking teacher and principal issues with student discipline practices and priorities? If so, please provide evidence that this is occurring. Also, has the board and/or a board committee discussed and/or been briefed on teacher and principal issues with discipline practices and priorities? **Staff please answer the first question. There is not a Board committee with this as its jurisdiction, and the Board as a whole has not been briefed or had a discussion.** In current teacher negotiations as was discussed in executive session with the Board on May 11, 2021, teacher representatives and district representatives will work to update the PAT agreement and provide feedback to the draft Board Policy. School leaders and teachers were part of the committee that drafted the draft Board policy for Student Conduct & Discipline. There was also a community engagement process for the draft policy including staff and families.

ACC to AC recommendation: Staff to provide the Board with tracking information and analysis of teacher and principal issues with student discipline practices.

6. Has the board and/or a board committee discussed and/or been briefed on student discipline data - expulsions and suspensions - and discussed it? **There is not a board committee with this as its jurisdiction, and the Board as a whole has not been briefed or had a discussion.**

ACC to AC recommendation: The Board should schedule a discussion once the staff has provided the Board with the tracking information and analysis.

7. Has the district established a clear referral process for students and staff. If yes, please provide documentation. **Staff provide documentation please.**

Here is the Discipline Due Process Flowchart -

<https://www.pps.net/cms/lib/OR01913224/Centricity/Domain/44/PPS%20Displine%20Due%20Process%20Flowchart.pdf>

Here is the Discipline Process Checklist -

<https://docs.google.com/document/d/1FMYtyOyhGSblJfrmXhSd0Q5OE4Yq-9Wy3CGGbytY7Pc/edit>

Discipline Referral Forms can be found here - <https://www.pps.net/Page/13544>

ACC to AC recommendation: No additional action needed.

SoS Recommendation: 26f (Board) Improving control of purchasing card transactions, contract performance management, and the oversight of key contracts.

Follow up questions from SoS Auditor and the PPS Response:

For board contract oversight:

1. Is this note in the board recommendation template accurate?: In 2020-21 contracts, annual review and approval of multi-year contracts was eliminated. If yes, why were these eliminated? How is the board reviewing performance of these contracts? **Yes, for the multi-year student and school support contracts as of last fall. It's unclear why staff made this change. I recommend that in July and August, the board receive the year end reports along with staff analysis as to whether the contractor met the performance goals in the contract.** (EC: It has always been our practice that when we seek approval for a renewable contract per an RFP (that is explicitly renewable for x number of years), we get up front Board approval for the entire initial period plus all renewal periods and the entire potential spend through all renewals. Because the equity/partnership contracts are no longer directly negotiated on an annual basis, but instead subject to a rigorous RFP process with clearly delineated goals and reporting, and bound/constrained by the scope specified in the RFP, they are now treated like all other formally solicited contracts for Board approval purposes. To specifically treat these formally solicited contracts differently - requiring annual Board

review - would arguably be an unfair burden solely applicable to contracts with our culturally specific providers. On the other hand, to require every annual renewal of every formally solicited contract - across all categories - to be presented to the Board for approval would create a significant burden on staff who prepare the Board contracts agenda and on the Board. It could also hold up work mid-contract. Staff believes that this burden is not warranted for contracts subject to a rigorous formal solicitation process.)

ACC to AC recommendation: Staff should annually make available -- upon request -- program outcomes and reports on contracts in which services are provided to students. This is not Board approval rather it is making available contract outcomes. (For the record, contracts were brought to the board that were incomplete in terms of performance goals; provide evidence that the Board received them after they were set.

2. A related question: For large contracts involving instruction or student/family support, when is the board reviewing contractor performance? **See answer above.** (EC: Note that when a contract is subject to an RFP, the review of the contractor performance process will happen when a new RFP is issued and the same contractor proposes. This is incorporated in the evaluation process. Also note that any large instructional or student/family support contracts not subject to renewable RFP will still come to the Board each year as usual.)

ACC to AC recommendation: Staff explain what happened to the annual performance evaluation that was required on these contracts if the review only occurs when they are renewed multiple years later.

3. Is the board reviewing performance annually? At the end of this school year, will be the first year of the multi-year contracts without an annual renewal vote by the board. Is it reviewing it upon renewal? **The district did not provide a response to a board member request for the final performance goals that were missing in contracts when they came before the Board.** [Dani?]

ACC to AC recommendation: Based on EC answer to #2, no one will be reviewing the performance annually. Confirm with staff. Ask the Secretary of State auditors for a recommendation on best practices given the staff response.

4. Is the board still reviewing contractor performance reports when student-centered multi-year contracts that are not competitively bid are up for extension/being renewed? **The Audit Committee recommends that the board be provided a report on contract performance and student outcomes in August before the next contract year begins.** The District held an RFP competitive process and contracts now include specific metrics and outcomes. Contracts have been awarded through a competitive process.

ACC to AC recommendation: Ask staff to explain who is reviewing annually the specific metrics and outcomes? Specific metrics and outcomes for contracts should be available to the board and public. Ask the Secretary of State auditors for a recommendation on best practices given the response from staff.

5. Does the board review any non-competitive contracts under \$150,000? **No, staff told the Audit Committee that it was time intensive to create the report and that they no longer would be provided. Divided committee response to staff decision.** (EC: Note that in the PPS Public Contracting Rules authority to sign contracts \$150,000 and under is delegated to the Superintendent and/or his designees. It is not clear how after-the-fact Board review of these contracts is useful or what it would accomplish, given that the District is already bound when these were reported to the Board. If the audit committee simply wants a periodic (semi-annual or annual) list of directly negotiated contracts to get a sense of the scope, Board members can ask and we can pull these. The twice monthly process was indeed burdensome, however, and did not result in any changes to or cancellations of contracts.)

ACC to AC recommendation: Ask the Secretary of State auditors for a recommendation on best practices given the response from staff.

6. Is the board reviewing the performance of contractors operating alternative schools? i.e. how often, what is the board looking at, etc. Please send links to any performance reviews and board or subcommittee meetings discussing them. The Charter and Alternative Program Board Sub Committee meets multiple times each school year. Here are the meeting materials from 2020-21 showing a review of both Charter and Alternative programs: November 13, 2020 <https://meetings.boardbook.org/Public/Agenda/915?meeting=440798> February 2, 2021 <https://meetings.boardbook.org/Public/Agenda/915?meeting=453706> April 20, 2021 <https://meetings.boardbook.org/Public/Agenda/915?meeting=465532> With regard to the review of our Contracted Alternative School performance review, similar to our RESJ contracts, performance review is a staff responsibility. However, the Charter School and Alternative Programs committee will also review contracts and data annually and is scheduled to do so at the next meeting which is currently being scheduled for the first week of June. Data included in the annual contractor review process includes operations, fiscal, and student growth and outcomes metrics. Related templates include: [Alternative Accountability Framework Calendar](#), [2020-21 Annual Alternative Accountability Goals](#), [Annual Deliverables](#), and [CBO School Annual Site Review Template](#).

ACC to AC recommendation: No further action needed.