

To: Board of Directors
From: Kristina Howard, Senior Chief
Date: October 7th, 2025
Subject: Division 22 Assurances Report for 2024-25

BACKGROUND

Annually, superintendents are required by Oregon Administrative Rules (OAR) 581-022-2305: District Assurances of Compliance with Public School Standards to report the district's status with respect to the Standards for Public Elementary and Secondary Schools. The Standards are adopted by the State Board of Education and set out in OAR Chapter 581, Division 22. By November 1, 2025, the district must share the report to the school board in a public meeting and post the report to the school district's web page. The district must then submit the report to the Oregon Department of Education by November 15, 2025. District staff have compiled the Annual Report on Compliance with Oregon Standards.

Division 22 represents a set of standards established by the Oregon Department of Education to ensure that school districts are providing quality education and maintaining compliance with the law. The standards cover everything from curriculum, instructional materials, and graduation requirements, to health and safety regulations.

In Portland Public Schools, we oversee numerous programs that fall under the scope of Division 22. We are proud to report that our district is currently in compliance with the vast majority of the standards. This reflects the dedication of our staff in ensuring high-quality education for all our students.

The Division 22 Rule Categories include:

1. High-quality learning experiences
2. Aligned & focused educational systems
3. Engaged partners & communities
4. Safe & inclusive schools
5. Committed & supportive staff

Within these four categories, there are 8 areas where we are still in the process of achieving full compliance. We will share with you the specific areas where we are either in partial compliance



or working towards full compliance, and we will outline the corrective action plans we've implemented.

Diploma Requirements (OAR 581-022-2000) - Out of Compliance
Modified Diploma, Extended Diploma, and Certificate of Attendance

- Districts must annually provide parents information about diploma availability and requirements, and disclosure about certificates of attendance. On-site access to all courses is required for a diploma at all high schools.
- We are developing a common language that will appear on each high school's website and in their course guides that share the other paths to graduation. This work will be in place for the 25-26 school year. Counselors and special education case managers will engage in professional learning to also share this information with families as needed. We have an engagement plan outlined.

Physical Education Requirements (OAR 581-022-2263) - In Corrective Action

- 6-8 requirement: 150 minutes/week, averaged over the course of the entire school year (4 day week =120 minutes average). Must be taught by a licensed PE teacher. During the 2024-25 school year we identified and corrected for out of license teaching at three schools.
- We requested an extension from the ODE that was approved on January 6, 2025 for named reasons of licensure and facilities needs. We have been carefully planning for and supporting scheduling and facilities needs at: Cesar Chavez K-8, daVinci Middle School, George Middle School, Ockley Green Middle School, Metropolitan Learning Center and Winterhaven K-8. While facilities improvements are still needed to better support PE instruction, at this time all schools are meeting the expectations of both licensure and PE minutes.

Instructional Materials Adoption and Postponement (OAR 581-022-2355 and OAR 581-022-2360) - In Compliance

- Postponement of instructional materials adoption, based on the state adoption cycle, requires an application to the State.
- Districts must follow the adoption cycle established by the State Board of Education and provide free and appropriate instructional materials that meet the NIMAS guidelines.
- Our district received a two-year postponement waiver from ODE for the adoption of Science (9-12th grades specifically) instructional materials. We completed the adoption Spring of 2024 and are implementing the newly adopted materials this year.
- We are extending the 2024-25 K-12 Health adoption timeline in order to provide more time for field testing and also for community engagement.
- We also are scheduled to complete the Social Studies adoption for 6-12th this year and ask for Board approval to postpone K-5th to Social Studies adoption by one year to



adopt Spring 2027 and implement Fall of 2027.

Note: Separating Social Studies into two years requires approval for a planned postponement for the K-5th portion.

Programs and Services for TAG Students (OAR 581-022-2500) - In Corrective Action

- A written plan required. Must include identification process, services, district philosophy and goals, description of nature of services to meet goals, and evaluation plan. Districts must post the plan on their district website using the template provided by ODE. Student plans must address level and rate of learning. District TAG contact information must be reported to ODE annually. Other rule requirements defined.
- We are currently implementing “corrective action” for previously being out of compliance.

District Curriculum (OAR 581-022-2030) - Out of Compliance

- Outlines all required components of a district's planned instructional program. *New requirements for 2024-25: a planned K-12 instructional program for Social and Emotional Learning; a planned 9-12 instructional program which includes the Personal Financial Education and Higher Education and Career Path Skills content standards.
- Regarding Social Emotional Learning, we continued to pilot programming at grades 9-12 during the 2024-25 school year. Seven comprehensive high schools have selected and implemented a curriculum. The remaining high schools need additional time to fully implement during the 2026-27 school year.

Identification of Academically Talented and Intellectually Gifted Students (OAR 581-022-2325) - In Corrective Action

- Use of local norms and percentile thresholds are determined at the district-level. The person who is responsible for identification must be trained in accordance with the identification requirements.
- We are currently implementing “corrective action” for previously being out of compliance.

Rights of Parents of TAG Student (OAR 581-022-2330) - In Corrective Action

- Parent right to notification at time of identification regarding services and programs offered, opportunity to provide input on their child’s plan. Parents may opt their student out at any time.
- We are currently implementing “corrective action” for previously being out of compliance.

Menstrual Dignity for Students (OAR 581-022-2515) - Out of Compliance

- Requires free and accessible menstrual products (tampons and pads) in every school bathroom K-12, instructions on use of menstrual products within bathrooms, and Menstrual Health education in the classroom as part of the health and sexuality



education program.

- We are in partial compliance with this standard. While we have made progress by ensuring free and accessible menstrual products in multi-stall and most student-accessible bathrooms, we are working to ensure that every bathroom in our K-12 schools is equipped with the appropriate products consistently.
- Our action plan includes purchasing additional supplies, installing new dispensers, and creating systems to ensure maintenance. We expect full compliance during the 2025-26 school year.

Required Instructional Time (OAR 581-022-2320 Required Instructional Time) - Out of Compliance

- Each school shall ensure that at least 92% of all students in the district and at least 80% of all students at each school operated by the district are scheduled to receive annually the following minimum hours of instructional time:
  (A) K-12: Grade 12 — 966 hours;
  (B) Grades 9–11 — 990 hours;
  (C) Grades K–8 — 900 hours.
- For the 2024-25 school year one comprehensive high school narrowly missed the 80% rule, which requires each student schedule to receive the minimum instructional hours.

Please see Required Instructional Minutes staff report for more information regarding why we are out of compliance for the 2024-25 school year and immediate planning for corrective action.

ADDITIONAL INFORMATION

It is also important to note the Division 22 Assurances allow for a combined accountability model. Districts report annually on compliance with each of the standards and include an explanation and corrective action plan for any rule with which the district is out of compliance. For local accountability, districts must report to their local school board by November 1st annually and make a report available on the district website by November 1st. For state accountability, districts must submit assurances to the Oregon Department of Education by November 15th. The Oregon Department of Education reviews all submissions and follows up with districts that have self-reported as being out of compliance.

If a school district is found to be out of compliance with state regulations, the Oregon Department of Education (ODE) will review its proposed corrective action plan and either approve or reject it. If the initial plan is rejected, the ODE will provide the district with technical assistance and support to help them revise it. Once an approved plan is in place, the ODE may continue to offer support as needed. The district must complete all corrective actions by the beginning of the next school year. Should the district fail to come back into compliance even



after this opportunity, the ODE has the authority to withhold a portion of its State School Fund monies.

Additionally moving forward, SB141 calls for a reimagined accountability system that emphasizes partnership, shared accountability, student outcomes, equity, transparency, and streamlined state oversight, which will have long-term implications on the Division 22 Standards. SB141 requires ODE to contract with a public or private entity to review the OAR requirements that must be met for a school district to be considered standard. The entity shall identify standards that best support student outcomes and that should be prioritized and which could potentially be removed from the Division. ODE will submit a report (which may include recommendations for legislation) to Senate/House Education Committees by December 15, 2026.

Attachments:

- 2024-25 Compliance Report - Oregon Public Schools Standards
- Division 22 Assurances 2024-25 Presentation
- 2025 Division 22 Standards School Board FAQs
- Required Instructional Minutes 2024-25 Memo