

## **Agenda**

1. 4:30 pm - Introduction
2. 4:35 pm - Office of Internal Auditors (OIPA) activity status update
3. 4:40 pm - Health & Safety Checks Audit status update
4. 4:50 pm - Audit Committee review and discussion of the Secretary of State (SoS) recommendation
5. 5:30 pm - Audit Committee review and discussion of the staff responses to Secretary of State (SoS) recommendation
6. 5:40 pm - Bond Performance Audit Results-Future Scheduling
7. 5:50 pm - Public Comment  
*To sign-up for public comment email [PublicComment@pps.net](mailto:PublicComment@pps.net) or call Kara Bradshaw at 503-916-3906.*
8. 6:00 pm - Adjourn



**Audit Committee Meeting Date: June 19, 2021**

**Audit Status Update**

**ACH Audit**

- The Finance Department has resumed processing new ACH payment applications as well as processing requests to make updates to current ACH payment information.
- We plan to complete the outstanding testing of these two processes in June 2021.

**PCard Audit**

- Fieldwork has been completed.
- Wrapping up on the audit was placed on hold to prioritize the Health & Safety Checks audit.
- We anticipate the Health & Safety Checks audit will be completed in mid-June at which time we will resume wrapping up on this audit.

**Health and Safety Checks Audit**

- See memo detailing the status of the audit

**Hardship Transfer Audit**

- Next audit – Planning to begin mid-July, 2021

**Student Body Activity Funds Audit**

- Will begin following the Hardship Transfer audit. Tentatively late September.

**Other OIPA Activity Update**

**2020-21 Performance Evaluations for OIPA auditors**

- OIPA will be working with Director DePass to get the initial draft of the performance evaluation completed. The draft will be circulated to Audit Committee members for feedback.

**Audit Plan for the 2021-22 School Year**

- OIPA will be reaching out to members of the PPS Board of Education and District leadership team to solicit input for the 2021-22 Audit Plan throughout the summer and will have a draft for the Audit Committee's consideration in the fall.

**PPS Audit Reports webpage**

- Status of the implementation of the recommendations of the SoS report



**PORTLAND PUBLIC SCHOOLS**  
**OFFICE OF INTERNAL PERFORMANCE AUDIT**

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**Date:** 05/14/2021  
**To:** PPS Board of Education - Audit Committee  
**From:** Janise Hansen, CIA, Senior Internal Performance Auditor  
Mary Catherine Moore, Internal Performance Auditor  
**Subject:** Health & Safety Checks Audit – Status Update

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**Background**

On October 20, 2020, the Portland Public Schools (PPS) Board of Education approved the Office of Internal Performance Audit's (OIPA) 2020-2021 Audit Plan via resolution 6198. The Audit Plan included the Health & Safety Checks Audit. The purpose of the Health & Safety Checks Audit is to determine whether school buildings (where students are participating in in-person instruction) are in compliance with the building safety plan put in place due to the coronavirus pandemic. The audit will not determine the adequacy of the building safety plans, it will only determine compliance with each school safety plan.

In late 2020/early 2021 PPS began to offer in-person instruction utilizing the limited in-person instruction (LIPI) at a limited number of schools; which was subsequently expanded to all schools. OIPA was able to complete 10 tours of schools to determine compliance with the school's LIPI safety plan before the transition to a hybrid model of in-person instruction in April of 2021. OIPA has completed an additional 13 tours of schools to determine compliance with the school's hybrid safety plan.

The purpose of this memo is to provide the Audit Committee a summary of the results of the Health & Safety Check Audit tours (both LIPI and Hybrid) completed as of May 7, 2021.

**Audit Process**

Selection of Schools for Tours:

- OIPA prioritized the selection of Title 1, TSI, and CSI schools for tours.

Communication:

- OIPA notified the school building administration via email that their schools had been selected for tours. Typically the email was sent out on Wednesday or Thursday stating the tour would take place the following week. The exact date and time of the tour was not provided.
- At the end of the tours, OIPA offered a verbal debriefing to school building administration to discuss all items of concern identified during the tour. This provided school building administration with timely feedback and the opportunity to address any concerns immediately.

- Written results of the tours were emailed to school building administration along with a central office administration team timely; typically within two business days.
- OIPA participated in weekly status update meeting with the central office administration team to discuss and address concerns identified in the tours. See more details on this below in the Follow up on Tour Results section below.
- At the request of the central office administration team, if the tour identifies any items of concern that would be considered significant, OIPI agreed to call the central office administration team to verbally discuss the items immediately following the tour.

Complete details of the audit process will be detailed in the final audit report.

### **Tour Results**

**As of May 7, 2021, the Health & Safety Checks Audit tours has not identified any noncompliance with building safety plans that would be considered significant.**

Below, we listed several examples of non-significant items that were identified in the tours:

- While air filtration units were present in each classrooms and symptom space area, we noted six instances where the air filtration unit was not turned on. At our request, the air filtration units were immediately turned on and building staff stated they would be sure to turn them on each day moving forward.
- We noted one instance where a nurse or school health assistant (SHA) was not onsite while students were participating in hybrid in-person instruction. We noted a SHA was scheduled to be onsite; however, they were sick and no backup was available to cover. The central administration team stated SHA's are employees of Multnomah Education Service District (MESD) and they have been in communication with MESD who is working to fill SHA positions to support PPS' needs.
- We noted two instances where the max capacity for the classroom space was not listed. In both instances we confirmed the max capacity for the classroom space was not exceeded.

We also noted guidance provided to building administrators is not clear as to whether or not a window in classrooms and symptom space areas is required to be opened to increase air circulation.

### **Recommendation:**

We recommend the school district clarify guidance as to whether or not a window in classrooms and symptom space areas is required to be opened to increase air circulation and ensure updated guidance is circulated to building administrators as soon as possible.

Attachment B is the Hybrid Tour Checklist Template that OIPA utilized for the tours.

OIPA would like to acknowledge all of the time and effort of building staff as well as the school district administration team who have worked tirelessly to development and implement guidance to ensure a safe transition to reopening schools for a hybrid model of in-person instruction. We believe the results of tours completed thus far resulting in no significant noncompliance demonstrate the school district's commitment to a safe reopening of schools.

## **Follow up on Tour Results**

OIPA participates in the weekly meetings with a central office administration team where items identified during the tours are discussed and addressed. At the request of the administration team, OIPA is also reviewing evidence that items identified in the tours have been addressed and resolved as the audit progresses. For example, if the building administrators take a picture of the max capacity sign that has been posted for the classroom spaces where they were missing, we consider that item to be resolved.

Due to the unique nature of this audit, we agree with the administration team that reviewing evidence that items identified in the tours have been resolved as the audit progresses is a better approach than waiting until all of the audit tours have been completed. Due to the collaborative approach taken by the administration team we anticipate all of the items identified in the tours will be resolved before the final audit report will be issued. Any items that have not been resolved will be detailed in a final report along with recommendations.

## **Tours Completed**

As of May 7, 2021, OIPA has completed the following tours of building providing in-person instruction:

- 10 buildings providing limited in-person instruction (LIPI)
- 13 buildings providing a hybrid model of in-person instruction

A list of buildings toured as of May 7, 2021 is included in Attachment A.

OIPA is planning to complete an additional 21 tours of buildings providing hybrid in-person instruction. The total number of LIPI and hybrid tours completed before the end of the 2020-21 school year will represent approximately 45 percent of PPS buildings where in-person instruction is being provided.

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## **ATTACHMENTS**

- A. List of School Buildings Toured: page 4
- B. Hybrid Tour Checklist Template: pages 5 - 16

# Attachment A: List of Buildings Toured

<b>LIPI School Tours</b>	<b>Hybrid School Tours</b>
<ol style="list-style-type: none"><li>1. Leodis V. McDaniel H.S. at Marshal Campus</li><li>2. Ida B. Wells-Barnett H.S.</li><li>3. Alliance H.S. at Meek Campus</li><li>4. Benson Polytechnic H.S.</li><li>5. Cleveland H.S.</li><li>6. DaVinci Arts M.S.</li><li>7. Hosford M.S.</li><li>8. Jefferson H.S.</li><li>9. Roosevelt H.S.</li><li>10. West Sylvan M.S.</li></ol>	<ol style="list-style-type: none"><li>1. Abernethy K-5</li><li>2. Dr. Martin Luther King, Jr., PK-5</li><li>3. Boise Eliot/Humboldt E.S.</li><li>4. Chief Joseph Elementary K-5</li><li>5. Grout E.S.</li><li>6. Irvington E.S.</li><li>7. James John E.S.</li><li>8. Kelly E.S.</li><li>9. Lee K-8</li><li>10. Rigler E.S.</li><li>11. Rosa Parks E.S.</li><li>12. Sabin E.S.</li><li>13. Scott E.S</li></ol>

# Attachment B: Hybrid Tour Checklist Template

## \_\_\_\_\_ School Reopening Plan - Hybrid Audit Tour Results

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**Tour Date/Time:**

Hybrid tour scheduled on: (day), (date), at (time) a.m. or p.m.

SCHOOL K-5 – address:

Administrator(s) On Site: \_\_\_\_\_, Principal, and \_\_\_\_\_, Assistant Principal, or \_\_\_\_\_, Vice Principal

**Auditor information:**

Janise Hansen, CIA

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OR

Mary Catherine Moore

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**Results:**

The results of each auditor procedure are listed below. Items where some level of concern are in red font to draw then to your attention. Auditor notes we would like to draw your attention to are in blue font.

**Auditor Concluding Thoughts:**

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**Staffing**

<p><b>Staffing Information</b> <i>HR is continuing to bargain with labor partners and finalizing leave options, We know this will impact your staffing needs and will communicate information as it is available.</i></p> <p><i>Please understand there are no guarantees additional staff will be available however, HR will do their best to support the request.</i></p>	<p><b>Auditor Procedures: - N/A</b></p>
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Identify Additional Staffing Needs	Based on the assumption that all your staff will return for in-person hybrid, with the exception of those already on approved leaves, list any additional staff needs you have in order to successfully begin hybrid:	<b>Auditor Procedures:</b> Confirm with building administration that the staffing needs identified have been resolved. Confirmed: (Yes/No/NA) <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul>
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**Building Logistics**

Focus Area	School Plan	
Building Entry: <a href="#">Bus/School Entry Screening SOP</a>	Per page 25 of the <a href="#">RSSI Guidance</a> :  Diligently screen all students and staff for symptoms on entry to bus/school/outside learning space every day. This can be done visually as well as asking students and staff about any new symptoms or close contact with someone with COVID-19. For students, confirmation from a parent/caregiver or guardian can also be appropriate. Staff members can self-screen and attest to their own health, but regular reminders of the importance of daily screening must be provided to staff.  <i>add any details pertinent to your building:</i>	<b>Auditor Procedures:</b>  Confirm school has identified points of entry to buildings to minimize logistical challenges and physical distancing issues prior to entering the school. Confirmed: (Yes/No/NA) <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> Confirm trained personnel is present at each school entry as students enter to conduct visual screening. Confirmed: (Yes/No/NA) <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> NOTE: Visual Screening symptoms could include: <ul style="list-style-type: none"> <li>• Unusual coloration (flushed, pale, or dusky)</li> <li>• Unusual behavior (behavior change, lethargy, unusual fatigue)</li> <li>• New or significant coughing</li> <li>• Respiratory symptoms not typical for student</li> <li>• Shortness of breath</li> <li>• Chills</li> <li>• Appearing ill</li> </ul>

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		<ul style="list-style-type: none"> <li>• Vomiting</li> </ul> Visually confirm screening personnel are wearing PPE as required in the PPS Covid-19 PPE SOP. Confirmed: (Yes/No/NA) <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> Confirm screening personnel briefly observe each individual for symptoms and ask questions if needed. Confirmed: (Yes/No/NA) <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> Confirm staff are aware of visual and student complaint symptoms associated with COVID-19 upon entry and throughout the day. Confirmed: (Yes/No/NA) <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> Confirm staff are aware when they observe students or staff with a chronic or baseline cough that has worsened or is not well-controlled with medication are aware that they should be excluded from school. (Do not exclude staff or students who have other symptoms that are chronic or baseline symptoms (e.g., asthma, allergies, etc.) from school). Confirmed: (Yes/No/NA) <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> Visually confirm masks, gloves, face coverings, soap or hand sanitizer, sanitizing stations, tissues, cleaning/disinfecting materials, and gowns are adequate (Two/three day supply - based on the number of student per day and how often the building is re-supplied). Confirmed: (Yes/No/NA) <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul>
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<p>Transportation (Bus entry and exit points, as well as adult who will meet the bus)</p> <p>Transportation is a long lead time to set up specific routing.</p> <p>Relevant SOPs: -<a href="#">Bus/School Entry Screening</a> -<a href="#">Loading/Unloading Bus and Vehicles</a></p>	<p>All K-3 Hybrid students will be provided bus tags.</p> <ul style="list-style-type: none"> <li>- Yellow tags for Kinders and other students who MUST be met at the bus stop.</li> <li>- White tags for info and for students who can be let off unattended.</li> <li>- Staff who meet buses:</li> </ul> <p><i>Add any other details pertinent to your school's transportation plan:</i></p>	<p><b>Auditor Procedures:</b></p> <p>Confirm drivers have been trained to conduct visual screening as students enter the bus. Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> <p>Confirm drivers know the protocol if a student is exhibiting obvious symptoms (the student will be given a disposable mask or face covering if needed, the driver will notify central radio to notify school or home, and the student will sit in one of the front seats, 6 feet away from the driver and other students). Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> <p>Confirm bus drivers and any parent or school staff assisting with the securement of student or safety equipment are wearing face shields/coverings. Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul>

		<p>Confirm students are wearing face coverings while at the bus stop and on the bus. Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> <p>Confirm driver loads the bus from back to front maintaining physical distancing to the greatest extent possible, and for return trip home, students board and sit in order of drops. Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> <p>Confirm only one student assigned per seat (unless students live in the same household, siblings should ride together). Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> <p>Confirm at school and at bus stops that students remain in their seats until called by the driver to unload one at a time. Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> <p>Confirm driver keeps track of student riders and attendance daily on the bus roster. Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> <p>Confirm driver is aware of disinfecting all high touch areas after each run, and again at the bus yard after completion of the route. Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul>
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		<p>Visually confirm buses have "Go Bags" that contain extra disposable face coverings, face shields, gloves, hand sanitizer, and essential cleaning/disinfecting supplies.  <b>Confirmed: (Yes/No/NA)</b></p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul>
<p>Symptom Space          (if a student feels sick during the day)  <a href="#">-Symptomatic Student Response</a>  <a href="#">-Symptom/Isolation Space Requirements</a></p>	<p><i>Symptom Space Room Number/Location:</i></p> <p>If an individual feels ill, we will immediately separate the ill student/staff from other members of the building. The student will go to the symptom space room and be fully assessed/screened by the school health assistant or trained designated staff. Staff who are experiencing symptoms or develop symptoms during the school day will be sent home. Staff are encouraged to contact their health care provider as needed. <a href="#">The Symptom Tracker Tool</a> will need to be filled out for any symptomatic individuals (staff or student). The school nurse will determine if the student needs to be sent home and provide further exclusion guidance depending on symptoms. If there is a COVID-19 related concern the <a href="#">COVID-</a></p>	<p><b>Auditor Procedures:</b></p> <p>Confirm anyone displaying or reporting symptoms of concern upon entry to bus/school or in the classroom receives further screening by the school nurse. This includes measuring for a temperature over 100.4 degrees F.  <b>Confirmed: (Yes/No/NA)</b></p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> <p>Confirm staff or students who have primary COVID-19 symptoms are aware that they must remain home in accordance with the ODE Exclusion Summary Guidance chart.  <b>Confirmed: (Yes/No/NA)</b></p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> <p>Visually confirm there is a sign-in/out log to track students/staff use of the symptom space. (Note: This could be a printed log on online log.)  <b>Confirmed: (Yes/No/NA)</b></p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> <p>Confirm building has the Symptom Tracking Tool Log that tracks symptoms for students and staff absent from school or work due to illness, as well as those individuals who develop symptoms of illness while attending school. The school nurse and nurse consultant then conduct additional surveillance which may require intervention and/or reporting to Multnomah County Health Department.</p>

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<p><a href="#">19 Case Protocol</a> will be activated.</p> <p>Staff and students who come to the Symptom Space and are exhibiting COVID19 related symptoms will be asked to take a COVID 19 rapid test. We will ask for consent and provide the test for self administration. Once the test has been completed and results have been provided, the staff or student will be sent home. For those who do not give consent, they will be referred to their health provider and sent home.</p> <p><i>Add any other details pertinent to your building:</i></p>		<p><b>Confirmed: (Yes/No/NA)</b></p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> <p>Confirm that staff managing the Symptom Space are trained to appropriately log students into a shared Symptom Tracking Log.  <b>Confirmed: (Yes/No/NA)</b></p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> <p>Visually confirm Symptom Space has extra disposable face coverings, masks, face shields, hand sanitizer (with 60% or greater alcohol content if soap and water is not accessible), gowns, gloves, and essential cleaning/disinfecting supplies.  <b>Confirmed: (Yes/No/NA)</b></p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> <p>Confirm Symptom Space adhere to the following:</p> <ul style="list-style-type: none"> <li>o Must be separate from routine health screening room</li> <li>o Must have appropriate ventilation (i.e. exterior windows, functional unit ventilators or building HVAC ventilation. Do not use fans if doors and windows are closed and fans are recirculating classroom air.)</li> <li>o Students must be supervised (ensure line of sight; keep ill student visible.)</li> <li>o Student must have appropriate PPE while in symptom space</li> <li>o Appropriate physical distancing and barriers will be in place (Maintain a distance of 6 feet or more between cots, chairs, or isolated individuals.)</li> <li>o Staff must have appropriate PPE while in the symptom/isolation space (medical grade mask, gloves, isolation gown, and should be properly removed and disposed or disinfected as appropriate prior to existing the symptomatic/isolation space.)</li> <li>o Have a plan for students who parents are unable to pick them up in a timely manner.  <b>Confirmed: (Yes/No/NA)</b></li> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> </ul>
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		<ul style="list-style-type: none"> <li>If No, detail observations:</li> </ul> <p>Confirm staff are aware of the Symptom Space cleaning and disinfecting guidelines, which are: plan disinfection after space has been empty 4 hours; or, disinfect while wearing full PPE (medical grade mask, gloves, isolation gown). After dismissal of ill student, close off areas used by a sick person and do not use these areas until after cleaning and disinfecting.</p> <p>Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>If no, do the observations appear to be a substantive difference from the plan:</li> <li>If No, detail observations:</li> </ul> <p>Confirm the custodian is made aware when the Symptom Space is used for cleaning purposes. How is the custodian informed?</p> <p>Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>If no, do the observations appear to be a substantive difference from the plan:</li> <li>If No, detail observations:</li> </ul> <p>Confirm designated personnel completed training on identification of COVID-19 symptoms.</p> <p>Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>If no, do the observations appear to be a substantive difference from the plan:</li> <li>If No, detail observations:</li> </ul>
<p>Schools must register with CRRU to enroll in the Testing Program: All testing will be performed under the umbrella of a Clinical Laboratory Improvement Amendments (CLIA) certificate of waiver and a standing physician order held by OHA. In order to test for COVID-19 under this waiver, schools must register by completing and returning the COVID-19 Testing K-12 Registration Form via email to <a href="mailto:Schooltesting.covid@dhsosha.state.or.us">Schooltesting.covid@dhsosha.state.or.us</a>.</p> <p>Schools must have School Testing Administrator trained: The Abbott</p>	<p>This testing must be managed at the school level. Schools must identify a school testing coordinator and a testing reporter, these can be the same person, but there will need to be a back up person for both roles (same person okay again).</p> <p>Daily reports must be submitted to the CRRU by the School Testing Reporter</p>	<p><b>Auditor Procedures:</b></p> <p>Confirm building has a SHA or Nurse on-site at all times students are.</p> <p>Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>If no, do the observations appear to be a substantive difference from the plan:</li> <li>If No, detail observations:</li> </ul> <p>Confirm building has registered with CRRU to enroll in the testing program and testing supplies are onsite.</p> <p>Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>If no, do the observations appear to be a substantive difference from the plan:</li> <li>If No, detail observations:</li> </ul>

<p>BinaxNOW training modules are <a href="#">available here</a>.</p>	<p>Identify a School Testing Administrator:</p> <p>Identify a School Testing Reporter:</p>	<p>Confirm the building plan has identified a school testing administrator and a school testing reporter, and a back-up for each.</p> <p>Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>If no, do the observations appear to be a substantive difference from the plan:</li> <li>If No, detail observations:</li> </ul> <p>Confirm school testing administrator and school testing reporter have completed the Abbott BinaxNOW training modules.</p> <p>Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>If no, do the observations appear to be a substantive difference from the plan:</li> <li>If No, detail observations:</li> </ul> <p>Confirm school testing administrator is aware there needs to be a consent signed within 24 hours prior to performing the test:</p> <p>Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>If no, do the observations appear to be a substantive difference from the plan:</li> <li>If No, detail observations:</li> </ul>
<p>Restrooms</p>	<p>Review <a href="#">Restroom Use Requirements</a> and add any details pertinent to your building:</p>	<p><b>Auditor Procedures:</b></p> <p>Visually confirm bathrooms are used by students according to building plan.</p> <p>Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>If no, do the observations appear to be a substantive difference from the plan:</li> <li>If No, detail observations:</li> </ul> <p>Confirm restroom flushers, faucets, and soap dispensers are functioning properly, and that there is enough soap.</p> <p>Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>If no, do the observations appear to be a substantive difference from the plan:</li> <li>If No, detail observations:</li> </ul>
<p>Hand Washing</p>	<p>Review <a href="#">Hand Hygiene and Respiratory Etiquette</a> and add</p>	<p><b>Auditor Procedures:</b></p> <p>Confirm washing stations have hand washing instructions and soap</p>

	<p><i>any details pertinent to your building:</i></p>	<p>dispensing are functioning properly and have enough soap for the number of students.  <b>Confirmed: (Yes/No/NA)</b></p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> <p>Confirm rooms that do not have sinks have hand sanitizer.  <b>Confirmed: (Yes/No/NA)</b></p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul>
<p>Nutrition  <a href="#">Table Washing &amp; Sanitation</a></p>	<p>Meals will be made available to students who participate in the hybrid model.</p> <p>Students in each cohort will be offered breakfast and lunch when they leave the school building. Meals cannot be eaten while on the bus.</p> <p>No food will be allowed to be eaten in the school unless a student requires an accommodation which is previously established. The school office may purchase individually wrapped snack foods to be provided in an emergency. Safety and sanitation protocols must be followed when students are eating and removing their masks; hand washing or hand sanitizer before and after eating, student is physically distanced from others and washing/sanitizing the table or</p>	<p><b>Auditor Procedures:</b></p> <p>Confirm no food items (other than water bottles)  <b>Confirmed: (Yes/No/NA)</b></p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> <p>If the building plan describes specific protocols related to nutrition, confirm compliance with the building plan.  <b>Confirmed: (Yes/No/NA)</b></p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul>

	<p>desk if necessary (<a href="#">see SOP</a>).</p> <p>Students may bring their own, filled water bottles but may not refill in the hallway.</p> <p><i>Add any other details pertinent to your building:</i></p>	
Drop Off & Pick-Up	<p><i>Add drop off &amp; pick-up details pertinent to your building:</i></p>	<p><b>Auditor Procedures:</b></p> <p>Confirm students' drop-off and pick-up agree with the building plan.  <b>Confirmed: (Yes/No/NA)</b></p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul>
Dismissal (leaving the building)	<p><i>Add dismissal details pertinent to your building:</i></p>	<p><b>Auditor Procedures:</b></p> <p>Confirm students' dismissal agrees with the building plan.  <b>Confirmed: (Yes/No/NA)</b></p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul>
Class Changes (movement between different rooms or classes)	<p><i>Add class changes details pertinent to your building:</i></p>	<p><b>Auditor Procedures:</b></p> <p>Confirm class changes, if applicable, agrees with the building plan.  <b>Confirmed: (Yes/No/NA)</b></p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul>
In Classroom Procedures (supplies, tech carts, power supplies, etc)	<p><i>Add classroom procedure details pertinent to your building:</i></p>	<p><b>Auditor Procedures:</b></p> <p>Confirm Students will be limited to seating alone at one table or desk.  <b>Confirmed: (Yes/No/NA)</b></p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive</li> </ul>

		<p>difference from the plan:</p> <ul style="list-style-type: none"> <li>• If No, detail observations:</li> </ul> <p>Confirm masks are worn. Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> <p>Confirm physical distancing requirements were enforced. Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> <p>Confirm materials are not shared. Or, if shared, confirm materials are sanitized at the start and end of each cohort. Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> <p>Confirm max capacity signage outside each room. Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> <p>Confirm max capacity for the room is not exceeded. Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> <p>Confirm classroom desks have been spaced at 6' distances. Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> <p>Confirm portable air filtration units are in each room and are turned on. Confirmed: (Yes/No/NA)</p>
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		<ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul>
Student Break Space (used if a student needs to be removed from class)	<p><i>Identify the student break space:</i></p> <p><i>Add any other details pertinent to your building:</i></p>	<p><b>Auditor Procedures:</b></p> <p>If the building plan describes specific procedures related to use of student break space (that are related to the mitigation of COVID-19 transmission), confirm compliance with identified procedures. Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul>
Use of Outdoor Space	<p><i>Do you intend to use outdoor space in any way that is different from your typical operations?</i></p> <p><i>If so, what areas do you intend to use and for what purpose (instructional, small group work, etc)?</i></p> <p><i>Please work with your Head Custodian and FOM to support the set-up and maintenance of that space</i></p>	<p><b>Auditor Procedures:</b></p> <p>If the building plan describes specific procedures related to use of outdoor space (that are related to the mitigation of COVID-19 transmission), confirm compliance with identified procedures. Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul> <p>If the building plan describes use of outdoor space, confirm the Head Custodian has been consulted for support with set-up and maintenance of that space. Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> <li>• If No, detail observations:</li> </ul>
Student Devices: Students who have checked out a PPS device will bring them for use in school buildings. We are ordering more student devices to support reopening.	<p><i>Indicate the estimated number of devices needed for students who have not checked out a PPS device =</i></p> <p><i>Add any other details pertinent to your building:</i></p>	<p><b>Auditor Procedures:</b></p> <p>If the building plan describes specific procedures related to student devices (that are related to the mitigation of COVID-19 transmission), confirm compliance with identified procedures. Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>• If no, do the observations appear to be a substantive difference from the plan:</li> </ul>

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		<ul style="list-style-type: none"> <li>If No, detail observations:</li> </ul>
Childcare or other program overlap	<i>How will this program overlap and interact with childcare, athletics or other programs?</i>	<b>Auditor Procedures:</b> If the building plan describes specific procedures related to childcare or other program overlap (that are related to the mitigation of COVID--19 transmission), confirm compliance with identified procedures. Confirmed: (Yes/No/NA) <ul style="list-style-type: none"> <li>If no, do the observations appear to be a substantive difference from the plan:</li> <li>If No, detail observations:</li> </ul>

**Schedules & Supports**

Schedule	<a href="#">Link your academic schedule here</a> <a href="#">Scott Q4 Master Schedule</a>	<b>Auditor Procedures:</b> - N/A
Student Intervention Team: <a href="#">Using SIT Data to Prepare for Returning Students</a>	<i>As we return to buildings, we will need to account for a wider spread sense of anxiety, unease, dysregulation.</i>  <i>Review current SIT tracking data and consider how interventions for students with the highest need will translate to in-person instruction.</i>  <i>Reach out to your MTSS TOSA for additional support.</i>	<b>Auditor Procedures:</b> If the building plan describes specific procedures related to student intervention team (that are related to the mitigation of COVID-19 transmission), confirm compliance with identified procedures. Confirmed: (Yes/No/NA) <ul style="list-style-type: none"> <li>If no, do the observations appear to be a substantive difference from the plan:</li> <li>If No, detail observations:</li> </ul>
Trauma Informed Practices & Healing Centered Engagement for all staff Planning for Synchronous and Asynchronous trainings	<i>Think about the general student population and how many students will need additional supports - how are you integrating trauma informed practices throughout Tier I programming?</i>	<b>Auditor Procedures:</b> If the building plan describes specific procedures related to trauma informed practices (that are related to the mitigation of COVID-19 transmission), confirm compliance with identified procedures. Confirmed: (Yes/No/NA)

		<ul style="list-style-type: none"> <li>If no, do the observations appear to be a substantive difference from the plan:</li> <li>If No, detail observations:</li> </ul>
School Counselor and Social Worker Support & Collaboration	<i>How will you collaborate with your school counselor(s) and if applicable, school social worker, to consider the needs students will have as they return to the building, and to create a plan for addressing those needs both proactively and reactively? How will school counselors and social workers have access to students (virtual or in-person, or a combination) for classroom lessons, small groups, interventions, and individual student support? Please consider cohort/interaction limitations while prioritizing these services.</i>	<b>Auditor Procedures:</b> If the building plan describes specific procedures related to school counselor and social worker support (that are related to the mitigation of COVID-19 transmission), confirm compliance with identified procedures. Confirmed: (Yes/No/NA) <ul style="list-style-type: none"> <li>If no, do the observations appear to be a substantive difference from the plan:</li> <li>If No, detail observations:</li> </ul>
SUN Partnership (there is more information on the Everything Hybrid site about SUN)		<b>Auditor Procedures:</b> If the building plan describes specific procedures related to SUN Partnership (that are related to the mitigation of COVID-19 transmission), confirm compliance with identified procedures. Confirmed: (Yes/No/NA) <ul style="list-style-type: none"> <li>If no, do the observations appear to be a substantive difference from the plan:</li> <li>If No, detail observations:</li> </ul>

**Special Education**

<a href="#">SpEd Hybrid Guidance</a>		
Focus Classroom	<i>Describe how focus classrooms will serve students assigned to that program:</i>	<b>Auditor Procedures:</b>

Collaborate with your <a href="#">SPED PA or AD</a> for the co-development of this plan		If the building plan describes specific procedures related to focus classrooms (that are related to the mitigation of COVID-19 transmission), confirm compliance with identified procedures. Confirmed: (Yes/No/NA) <ul style="list-style-type: none"> <li>If no, do the observations appear to be a substantive difference from the plan:</li> <li>If No, detail observations:</li> </ul>
SPED in General education classrooms:  Cohorting consideration for students with adult support Collaborate with your <a href="#">SPED PA or AD</a> for the co-development of this plan	<i>Describe how your special education services are integrated with your general education service:</i>	<b>Auditor Procedures:</b>  If the building plan describes specific procedures related to SPED in general education classrooms (that are related to the mitigation of COVID-19 transmission), confirm compliance with identified procedures. Confirmed: (Yes/No/NA) <ul style="list-style-type: none"> <li>If no, do the observations appear to be a substantive difference from the plan:</li> <li>If No, detail observations:</li> </ul>
School Psych / SLP:	<i>Describe the schedule/plan for School Psych, SLP, Learning Center to access the building:</i>	<b>Auditor Procedures:</b>  If the building plan describes specific procedures related to school psych/SPL (that are related to the mitigation of COVID-19 transmission), confirm compliance with identified procedures. Confirmed: (Yes/No/NA) <ul style="list-style-type: none"> <li>If no, do the observations appear to be a substantive difference from the plan:</li> <li>If No, detail observations:</li> </ul>
Learning Center / SLP:	<i>Have you checked in with the Learning Center and SLP on the adjustment that will be needed to their schedule?</i>	<b>Auditor Procedures:</b>  If the building plan describes specific procedures related to learning center/SLP (that are related to the mitigation of COVID-19 transmission), confirm compliance with identified procedures. Confirmed: (Yes/No/NA) <ul style="list-style-type: none"> <li>If no, do the observations appear to be a substantive difference from the plan:</li> <li>If No, detail observations:</li> </ul>

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Other plans or considerations you have taken for students with IEPs and SPED staff:		<b>Auditor Procedures:</b>  If the building plan describes specific procedures related to learning center/SLP (that are related to the mitigation of COVID-19 transmission), confirm compliance with identified procedures. Confirmed: (Yes/No/NA) <ul style="list-style-type: none"> <li>If no, do the observations appear to be a substantive difference from the plan:</li> <li>If No, detail observations:</li> </ul>
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**Emergency Planning**

Identify your COVID building team, and how you plan to regularly meet train them		<b>Auditor Procedures:</b>  Confirm School Level COVID-19 Response Team include: <ul style="list-style-type: none"> <li>Administrator</li> <li>School Nurse</li> <li>Custodian</li> <li>Staff Member(s) Screening, Isolation Space, Data Collection</li> <li>Staff Member(s) Monitor &amp; Promote Physician Distancing</li> </ul> Confirmed: (Yes/No/NA) <ul style="list-style-type: none"> <li>If no, do the observations appear to be a substantive difference from the plan:</li> <li>If No, detail observations:</li> </ul> Confirm COVID-19 Response Team meet weekly to address concerns with mitigation and prevention practices and to debrief confirm case responses (per the Emergency Response Framework and COVID-19 Response Team SOP it is recommended, not required). Confirmed: (Yes/No/NA) <ul style="list-style-type: none"> <li>If no, do the observations appear to be a substantive difference from the plan:</li> <li>If No, detail observations:</li> </ul>
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What changes to your emergency drills need to happen?	<i>Explain any health and safety changes and expectations and identify the evacuation process and staff roles:</i>	<b>Auditor Procedures:</b> If the building plan describes specific procedures related to emergency drills (that are related to the mitigation of COVID-19 transmission), confirm compliance with identified procedures. Confirmed: (Yes/No/NA) • If no, do the observations appear to be a substantive difference from the plan: • If No, detail observations:
How do you plan on training staff and students about emergency drills at your site?	Monthly fire drills are to be completed with each cohort and logged appropriately. Other hazard drills can be done both physically and through education/tabletop/scenarios.  <i>Please add more information about your school's emergency training plan:</i>	<b>Auditor Procedures:</b> Confirm staff and student training about emergency drills have been completed. Confirmed: (Yes/No/NA) • If no, do the observations appear to be a substantive difference from the plan: • If No, detail observations:
When will your drills occur?	<i>Please provide a detailed schedule of your drills and when they will occur and please provide what each cohort will receive:</i>	<b>Auditor Procedures:</b> Confirm emergency drills occurred as identified by the plan. Confirmed: (Yes/No/NA) • If no, do the observations appear to be a substantive difference from the plan: • If No, detail observations:

**Timeline**

Action	Details	Date(s)	
Communication with Families			<b>Auditor Procedures:</b> - N/A
Staff Training/Pre-service (dates are TBD, more			<b>Auditor Procedures:</b> - N/A

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<i>information to come soon)</i>			
Staff Walkthrough of Building	<i>This will be included as part of your Principal-driven staff training time.</i>		<b>Auditor Procedures:</b> Confirm Safety Committee's completion of the school site walk-through checklist. Confirmed: (Yes/No/NA) • If no, do the observations appear to be a substantive difference from the plan: • If No, detail observations:  <b>Auditor Documentation Request:</b> Obtain the completed school site walk-through checklist. Obtained: (Yes/No/NA) • If no, do the observations appear to be a substantive difference from the plan: • If No, detail observations:
First Day of Hybrid			<b>Auditor Procedures:</b> - N/A

**Custodial Plan (Facilities Operations Guidebook)**

Head Custodian and Principal/Facility Operations Manager aka FOM (FOM list found [HERE](#)) work on site specific plan using the Cleaning & Disinfecting SOP, found [here](#), as a baseline starting point. All staff will be asked to wipe down their primary work areas at the end of day, including desk, computer, phone etc.

Site specific questions to be answered:

When will bathrooms be cleaned?	<ul style="list-style-type: none"> <li>• Custodians will clean restrooms at the end of each day, following student dismissal.</li> <li>• Symptom Space rooms will be disinfected after use (will need 4 hour wait time for cleaning and disinfection), unless time is not available. <a href="#">Cleaning and Disinfecting Response Presumptive Covid 19 SOP</a></li> </ul> <p><i>Add any other details pertinent to your building:</i></p>	<b>Auditor Procedures:</b> Confirm bathrooms are cleaned, as described in the building plan. Confirmed: (Yes/No/NA) • If no, do the observations appear to be a substantive difference from the plan: • If No, detail observations:  Confirm the symptom space room is cleaned, as described in the building plan. Confirmed: (Yes/No/NA) • If no, do the observations appear to be a substantive difference from the plan:
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		<ul style="list-style-type: none"> <li>If No, detail observations:</li> </ul>
When will classrooms be swept and/or wet mopped?	<p>Each classroom will be swept at the end of the day. Rooms will be wet mopped, if time permits, between cohorts.</p> <p><i>Add any other details pertinent to your building:</i></p>	<p><b>Auditor Procedures:</b></p> <p>Confirm classrooms are swept and/or wet mopped, as described in the building plan.</p> <p>Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>If no, do the observations appear to be a substantive difference from the plan:</li> <li>If No, detail observations:</li> </ul>
What is the expectation and frequency of touchpoint cleaning throughout the day in other common spaces (door knobs, locker handles, counter tops, etc)?	<p><i>Add any other details pertinent to your building:</i></p>	<p><b>Auditor Procedures:</b></p> <p>Confirm touchpoint cleaning is done, as described in the building plan.</p> <p>Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>If no, do the observations appear to be a substantive difference from the plan:</li> <li>If No, detail observations:</li> </ul>
Ventilation (added from LIPI)	<p><b>Ventilation</b></p> <p>Building HVAC outside air dampers will be adjusted such that their minimum damper setting meets recommended outside air infiltration rates per ASHRAE Standard 62.1-2019 "Ventilation for Acceptable Indoor Air Quality." Introducing outside air will both dilute and displace airborne contaminants including airborne viruses inside the school buildings. HVAC programming will be adjusted to provide a minimum of two hours of purging before and after normal occupied hours using mechanical means. Additionally, HVAC systems will be operated continuously while the school buildings are occupied during these times; this may require temporary disabling of demand control ventilation (DCV) systems.</p> <p>Ventilation for each unique school will be optimized on a case-by-case basis. PPS will also utilize non-mechanical</p>	<p><b>Auditor Procedures:</b></p> <p>Confirm HVAC is run a minimum of two hours of purging before and after normal occupied hours using mechanical means and HVAC systems operated continuously while the school buildings are occupied during these times.</p> <p>Confirmed: (Yes/No/NA)</p> <ul style="list-style-type: none"> <li>If no, do the observations appear to be a substantive difference from the plan:</li> <li>If No, detail observations:</li> </ul>

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	<p>methods such as opening doors and windows where reasonable to increase air circulation. Do not prop open doors that can pose a safety or security risk to students and staff (e.g., exterior doors and fire doors that must remain closed).</p>	
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**Physical Set Up (Include any maps)**

Operations/FAM has completed the following work at all of the schools sites:

- Signage at all designated entrances, including exterior sidewalk spacing dots for 6' spaced queuing.
  - Auditor Procedures:**
  - Confirm signage at all designated entrances, including exterior sidewalk spacing dots for 6' spaced queuing.
  - Confirmed: (Yes/No/NA)
    - If no, do the observations appear to be a substantive difference from the plan:
    - If No, detail observations:
- Health screening station at all designated entrances (cart, signage, plexi-glass barrier for screener, hand sanitizer dispenser). Visual screening only, no temperature checking.
  - Auditor Procedures:**
  - Confirm health screening station at all designated entrances (cart, signage, plexi-glass barrier for screener, hand sanitizer dispenser).
  - Confirmed: (Yes/No/NA)
    - If no, do the observations appear to be a substantive difference from the plan:
    - If No, detail observations:
- Max. Capacity signage outside of each room.
  - Auditor Procedures:** See classroom procedures section above.
- Symptoms Space signage.
  - Auditor Procedures:**
  - Confirm symptoms space signage.
  - Confirmed: (Yes/No/NA)
    - If no, do the observations appear to be a substantive difference from the plan:
    - If No, detail observations:
- Hand-washing signage in bathrooms and each sink in classrooms.
  - Auditor Procedures:** See restroom and classroom procedures sections above.
- Floor signage designating one-way signage, and dots for spacing.
  - Auditor Procedures:**
  - Confirm floor signage designating one-way signage, and dots for spacing.
  - Confirmed: (Yes/No/NA)

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- If no, do the observations appear to be a substantive difference from the plan:
  - If No, detail observations:
- Plexi-glass barriers at the Main Offices, and other select designated shared office spaces.
  - Auditor Procedures:**
  - Confirm plexi-glass barriers at the main offices, and other selected designated shared office spaces.
  - Confirmed: (Yes/No/NA)
    - If no, do the observations appear to be a substantive difference from the plan:
    - If No, detail observations:
- Classroom desks have been spaced at 6' distances and desks removed to accomplish this.
  - Auditor Procedures:** See classroom procedures section above.
- Portable Air Filtration units have been designated for Symptom Spaces, and other critical areas such as the Nurses Stations, and Classrooms. Delivery of these units is expected to be completed by the first week of April or earlier.
  - Auditor Procedures:** Confirm portable air filtration units are in each room being used for instruction as well as the symptom space and nurses station
  - Confirmed: (Yes/No/NA)
    - If no, do the observations appear to be a substantive difference from the plan:
    - If No, detail observations:

## 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

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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

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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](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](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](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](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](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](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.

Recommendation No.	Recommendation	PPS Response	Auditor Follow-Up Questions	Evidence/Comments
3	Investigate and report on potential savings areas in depth, including the level of executive administration, use of substitute teachers and educational assistants due to educator absences, health benefits, bus services, legal services, and building utilization.	Executive Administration - Annual budgeting processes for the years following the SOS audit include a review of organizational structure and staffing at the executive level.  Employee Benefits - Annual budgeting processes for the years following the SOS audit include a review of benefit plans and costs. The Board sets parameters for a balanced compensation package when bargaining with each employee group.	<b>* If available, please provide evidence that the district reviewed executive staffing and health benefit plan costs during the budget process e.g. internal documents/documents shared with the board or board committees.</b>	The district eliminated one chief-level position from the Superintendent's cabinet from the 2021-22 fiscal year. The Health & Welfare Trust benefit annual rates review process is documented in Trust meeting minutes. <a href="#">Here is the most recent review.</a> Due to the COVID pandemic, the district worked to ensure continuing health coverage eligibility and access for employees in unusual or uncertain working conditions. For example, the district lowered the bar on health coverage eligibility requirements for our substitute workforce for the 2020-2021 plan year to ensure ongoing coverage for substitutes. (Substitute eligibility for health insurance is based on days worked in the prior school year. With the school closures beginning in March 2020 through the end of that school year, substitutes had dramatically reduced opportunities to work, which unexpectedly and negatively impacted their ability to get health coverage.) The district also increased options for leaves of absence to protect benefits, particularly for Nutrition Service employees and employees who were at increased risk of COVID. The district continues to use 5Site to compare data from finance, human resources and student achievement as provided through a statewide database from Oregon Department of Education. This tool is used live in budget development sessions and Senior Leadership Team meetings. A published benchmarking was sent to the board with the benchmarking report in November 2020. <a href="https://drive.google.com/file/d/1VBjiaHX_AgQYUqiy_qj7_1V_mJqkpsb/view?usp=sharing">https://drive.google.com/file/d/1VBjiaHX_AgQYUqiy_qj7_1V_mJqkpsb/view?usp=sharing</a> . The live internal budget development sessions drill down to detailed object and function review based on the area of the budget being discussed. For instance looking at class size and dollars spent on elementary teachers, and ratios for social workers and counselors. Portland compares itself with the 10K Group of 13 Oregon districts having over 10,000 students as well as doing comparisons for the three largest districts. If the Secretary of State Auditors would like a demonstration of how we do this, we are happy to share the process with you live.
4	Conduct regular and public peer benchmarking to identify potential savings areas and spending challenges. Identify peer districts using objective criteria, such as enrollment, level of poverty, and other demographic factors.		<b>1. Has the district done detailed peer analysis by more specific objects/functions)? Please provide if so. Was the more detailed analysis presented to the board or a board subcommittee? 2. Can you provide evidence that peer benchmarking was used to identify savings areas or otherwise inform the 2020-21 budget, e.g. an internal memo or a memo to the board or a board subcommittee? Will the 2021-22 budget include benchmarking details?</b>	Finance staff meet weekly with the 10K Group and benchmarking on revenue and expenditures is discussed on the agenda on a regular basis. Current year topics have been enrollment projections post-pandemic - impacting revenue - State School Fund, Student Investment Account and High School Success; impacting expenditures - staffing allocations to schools; Other discussions have included how ESSER funds are being spent, maintenance of effort tracking for special education expenses, issuing PERS bonds/PERS rates, budgeted funding levels forecasts from legislature - \$9.1 B, \$9.3B, \$9.6 B, Nutrition Services deficits, how State Summer Programs grant is being spent, COLA and Step expense comparisons, capital expenditures for ESSER funds, ongoing FEMA funds changes/submittals, childcare benefits, reopening schools, and legal counsel in-house vs. contracted.  Portland also participates in and uses the Council of Great City Schools KPI's published annually <a href="https://www.cgcs.org/cms/lib/DC00001581/Centricity/domain/35/publication%20docs/Managing%20for%20Results%20in%20Americas%20Great%20City%20Schools%202020.pdf">https://www.cgcs.org/cms/lib/DC00001581/Centricity/domain/35/publication%20docs/Managing%20for%20Results%20in%20Americas%20Great%20City%20Schools%202020.pdf</a> Staff attend biweekly Chief Financial Officers and Chief Operations Officers meetings for ongoing conversations supporting best practices and benchmarking is discussed. These are discussed at an annual retreat for Finance and Operations leaders as we participate in setting goals, developing budgets, and evaluate continuous improvement processes. The District purposely aligned the Strategic Plan with the Student Investment Account funding and reporting structure. Even though there haven't been any SBAC tests due to the pandemic, we have had one MAP testing this winter - presentation <a href="https://meetings.boardbook.org/Public/Agenda/915?meeting=465943">https://meetings.boardbook.org/Public/Agenda/915?meeting=465943</a> and report <a href="https://meetings.boardbook.org/Meeting/QuickView/465943">https://meetings.boardbook.org/Meeting/QuickView/465943</a> . The district also shares the SIA 3rd quarter report showing progress on investments. These are being shared at a board meeting on April 27.
5	Make the budget more clear and transparent to the public, including staffing and spending by program over time, key performance indicators, and analysis of key initiative outcomes.		<b>1. Were analyses of key initiative outcomes - similar to Beaverton's approach -- prepared by district? If so, please send. Also, were they supplied to the Board or subcommittees as part of the budget process or at other points? If not, are there plans to do so? 2. Are there any plans to include performance indicators by department in the budget or supporting materials?</b>	The Strategic Plan is being expanded this spring from five system shifts to seven. This was shared with the Board on March 11, 2021. <a href="https://meetings.boardbook.org/Public/Agenda/915?meeting=459416">https://meetings.boardbook.org/Public/Agenda/915?meeting=459416</a> Working teams continue to refine the work to be completed by June 15, 2021. This work will be incorporated into our final budget document for the Adopted Budget version. Updated department goals and performance measures will be included in the final version. 1. As of 4/13/21, there are 496 active cards held by 486 employees representing 153 schools and departments. A few cardholders hold both employee and department cards. Cardholders typically include at least two staff members in every school (typically principals, principal secretaries, and/or business managers/bookkeepers) and two or three staff members in every department (typically directors, business analysts, and/or administrative assistants). Two departments have a significant number of cards: (1) In order to facilitate emergency purchasing, all Purchasing & Contracting staff members have PCards except for the Pcard Program Manager and the PCard Accountant. (2) The Facilities & Maintenance department staff have 26 cards to facilitate purchases of supplies and materials when maintenance staff are out in the field addressing school building maintenance. 2. We do not have an aggregate analysis report, but in our monthly PCard purchase audit we focus our review and analysis by searching for and examining the following: Key business purpose terms (including but not limited to: gift card, incentive, party, prize, software, app, subscription, fraud, error); key vendors (including but not limited to food vendors, hotels, taxis, car rentals, Paypal, SQ, software and app providers); level 3 vendor reports; high dollar transactions; activity of cardholders with notable infraction histories, new cardholders, and cardholders with unusual volume of activity or dollar amount; and key department and account codes (e.g., professional development, specific grant codes).
6	Improve controls over purchasing card use. Improvements include requiring management review for at least non-standard and high-dollar transactions, and improving policy guidance on appropriate businesses purposes, taxpayer-funded meals, parties, student incentives, gifts, and use of unusual merchants. Also, the district should improve aggregate analysis of card use data to identify spending trends and unusual transactions.		<b>1. How many district employees have P-Cards now? 2. Basic summary data of pcard use was provided, but are you doing aggregate analysis of P-Card purchase trends and unusual transactions? If yes, please describe. If not, please describe why.</b>	1. Professional learning opportunities have been available throughout the year, including a comprehensive Teacher Institute with over 65 courses teachers could choose from in August 2020. These courses were then provided asynchronously, as well, if an educator was unavailable to attend. Professional learning was also provided during the September 2020 'soft start' for all teachers. These courses were differentiated for 'inexperienced' and 'experienced' teachers. Curriculum supports and direct coaching are also provided to new educators through the New Educator Orientation and New Teacher Mentors. 2. GVC training is provided at New Educator Orientation and TSI/CSI schools have two additional training days before the typical contract year begins. This training is site-based, but includes learning around GVC, instructional resources and best practices.
16	In developing a common core curriculum for schools, ensure adequate training for teachers — particularly new or inexperienced teachers.		<b>1. Please provide evidence/detail for the response statement that "additional professional development sessions, coaching, and drop-in supports have been provided to continue supporting new and inexperienced teachers." 2. How has the district tailored GVC training for new teachers at schools serving Title I/TSI/CSI schools? Can you provide documents that illustrate that tailoring?</b>	

17	Develop a strategic plan that sets concrete performance measures for improved student outcomes and discusses in depth the staffing, resources, interim steps, and improvements to the district's operations and organizational culture needed to reach those outcomes.	<p><b>* We have seen the Superintendent's message describing the three-year strategic plan, but it we haven't seen subsequent drafted strategies mentioned in the response. Have those been drafted? Please send if so.</b></p>	<p>The District purposefully aligned the Strategic Plan with the Student Investment Account funding and reporting structure. Even though there haven't been any SBAC tests due to the pandemic, we have had one MAP testing this winter - presentation <a href="https://meetings.boardbook.org/Public/Agenda/915?meeting=465943">https://meetings.boardbook.org/Public/Agenda/915?meeting=465943</a> and report <a href="https://meetings.boardbook.org/Meeting/QuickView/465943">https://meetings.boardbook.org/Meeting/QuickView/465943</a>. The district also shares the SIA 3rd quarter report showing progress on investments . These are being shared at a board meeting on April 27.</p>
18	Maintain a consistent feedback loop with teachers, educational assistants, parents, and other stakeholders regarding student conduct issues, particularly as they affect Title I schools and other high-poverty schools. Address teacher concerns about lack of clarity in school policies and lack of consistent behavior standards.	<p><b>1. Were the Panorama survey results for 2019-20 presented to and discussed by the board or a board committee? If they were, please send a link to the agenda materials the board or committee reviewed.</b></p> <p><b>1a. Do you have a full set of Panorama data that includes teacher responses by school? It appears that teacher responses are not reported by school on the public site. Please send if you do.</b></p> <p><b>1b. When is a Panorama survey for the 2020-21 school year scheduled to be completed and results returned?</b></p> <p><b>1c. Do you know if the 2020 Tell Survey was conducted and have you received results if so?</b></p> <p><b>2. Was implementation of MTSS coaching and PD focus on Title 1 schools delayed b/c of COVID and problems getting a data tracking tool? If so, when do you anticipate starting the Title I program?</b></p> <p><b>3. Please send the enhanced discipline referral reporting form and the original form, if available.</b></p> <p><b>4. Please describe the Chief of Schools' teacher- Principal advisory group in more detail. For example, how often does it meet, who are the members, and which members are from Title1/CSI/TSI schools?</b></p> <p><b>5. What methods do district central administrators have for getting feedback on student discipline issues directly from teachers in Title 1/CSI/TSI schools?</b></p> <p><b>6. Is the district continuing to report data on student discipline, suspensions, expulsions, etc? If so, please send a link to this information.</b></p> <p><b>7. Is the Behavior Collaboration Team still in place and focusing on historically underserved students and families?</b></p> <p><b>8. Did the district update the Disruptive Students Policy? Has it developed new Administrative Directives related to student conduct and discipline?</b></p> <p><b>9. Has the district developed a new social/emotional K-12 curriculum? If not, what is the timeline for development?</b></p>	<p>The Strategic Plan is being expanded this spring from five system shifts to seven . This was shared with the Board on March 11, 2021. <a href="https://meetings.boardbook.org/Public/Agenda/915?meeting=459416">https://meetings.boardbook.org/Public/Agenda/915?meeting=459416</a> Working teams continue to refine the work to be completed by June 15, 2021. This work will be incorporated into our final budget document for the Adopted Budget version. Updated department goals and performance measures will be included in the final version.</p>
19	Prioritize development and stability of effective principals by providing incentives and additional support, particularly at high-poverty schools. Supports include reducing turnover of principal supervisors, stabilizing district leadership, improving collaboration between principals and central administrators, improving hiring practices, streamlining initiatives, increasing collaboration between central office departments, and evaluating initiative results.	<p><b>1. Has PAPSA done an additional survey since 2018-19 to gauge principal satisfaction? Please provide a copy if so.</b></p> <p><b>2. Can you provide details on reducing initiative overload at schools or evaluating initiative results to help with that process?</b></p> <p><b>3. Is the district tracking turnover of principals at high-poverty schools and has the board discussed this? If so, please provide evidence. The leadership rosters from 2018-19 to 2020-21 indicate 19 of 24, or 80%, of the principals at Title I schools in 2018-19 were no longer at the schools in 2020-21.</b></p>	<p>1. We were set to present the Panorama survey information to the Board in May of 2020. Due to COVID, that was canceled. We did, however, provide detailed information to the board in regards to the Panorama survey, provided voluntary training to Board members in 2020 and provided access to the dashboard. 1a. <a href="#">Raw teacher data by school</a> 1b. The survey was completed in March and survey will be shared publicly in fall. 1c. Response requested.</p> <p>2. Yes. The MTSS coaching cohort #1 in 2019-2020 was completed. The MTSS Coaching Cohort #2 was rescheduled for 2021-22 school year. Data Tracking Tool is in development and is anticipated to begin rollout during 2021-22 school year.</p> <p>3. <a href="#">Enhanced Discipline Referral Reporting Form, original form</a></p> <p>4. The Chief of Schools Principal Advisory Group meets monthly and provides input and feedback to the Chief of Schools and others within the Division of Instruction and School Communities about a variety of topics, including Professional Learning for Principals, Return to In-person Learning, etc. There are 11 Principals on the team from schools that serve all grade bands. The schools represented by the Principals include 4 CSI schools and 4 TSI schools, with 5 schools also being Title 1.</p> <p>5. All central office district administrators have access to our Administrator's Dashboard and reports therein. Additionally, we developed and implemented a paper copy level one referral form in order for teachers to have direct feedback from principal.</p> <p>6. Yes, we are mandated by law to continue to track and report on discipline, suspensions and any exclusions. Data can be found <a href="#">here</a>.</p> <p>7. The Behavior Collaboration Team is not currently meeting. We have started a reimagine discipline committee.</p> <p>8. The Disruptive Students Policy was rescinded. We have created a Healthy, Substance Free Learning Environments Policy and are currently working on the Student Conduct and Discipline Policy.</p> <p>9. We are partnering with CASEL and ELDP in order to develop a 5 year Social Emotional Learning plan.</p> <p>1. We added an administrator satisfaction section to our Successful Schools Survey for the first time this year. PAPSA was involved in the item creation for the survey. Here is a <a href="#">link</a> to an initial summary of the results and we are currently conducting further analysis to inform next steps.</p> <p>2. We are currently working on our multi-year strategic plan. One outcome of this work is to streamline the number of initiatives to reduce strain across the organization and enhance focus on our primary strategies.</p> <p>3. We do track the turnover at high poverty schools and will continue to do so. We have not made a board presentation on this topic.</p>

20	<p>Work with union officials to address transfer and hiring issues that promote high turnover and lower teacher experience at high-poverty schools. Also address remaining contract issues raised in the recent investigation of teacher misconduct, including retention of educator records and reducing administrative obstacles to filing a complaint.</p>	<p>PPS is committed to reducing teacher turnover and improving supports to enhance teachers' work experience. For the 2019-20 school year and again through Student Investment Account engagement for 2020-21, PPS sought the input of PAT in advance of teacher hiring and staffing with a particular emphasis on additional staffing, supports, and educator professional development at high-needs schools.</p> <p>PPS completed bargaining with PAT on teacher misconduct and retention of educator records in June 2019, resolving issues raised in the independent investigation of misconduct commissioned by the School Board. The Professional Conduct Between Adults and Students Policy (5.10.064-P) was adopted by the School Board on October 15, 2019.</p> <p>Enhanced centralized support and resources for investigating misconduct complaints have been implemented, including hiring a Title IX Director and staff, offering specialized training, and creating and designating a School Compliance Officer at each school. The School Compliance Officers are trained to receive reports of bullying, harassment, and discrimination, provide safety planning for impacted students, support investigations, and ensure mandatory reporting. In addition, a new tracking system for allegations of employee misconduct was implemented in July 2019.</p> <p>One final remaining item which has been delayed due to the pandemic will be addressed during successor bargaining for the PAT collective bargaining agreement. The district is exploring a proposal to provide targeted staffing, professional development, and incentives to work at designated high-poverty schools for educators. Originally scheduled to begin in March 2020, successor bargaining for the PAT contract has been on hold while the parties address bargaining issues arising from comprehensive distance learning and pandemic conditions and restrictions.</p>	<p><b>Transfer and Hiring:</b></p> <p><b>1. Please provide evidence of steps the district and PAT have taken together to reduce teacher turnover and increase teacher experience at high-poverty schools. Have these steps resulted in reduced turnover and/or higher teacher experience?</b></p> <p><b>2. Is the district tracking teacher turnover and experience at high-poverty/Title 1/CSI/TSI schools and have district officials presented the results to the school board? If yes, please provide evidence of tracking and school board/committee presentation.</b></p> <p><b>Teacher Misconduct:</b></p> <p><b>3. Please see auditor questions in Column H of "Whitehurst Investigation PAT Contract Crosswalk" spreadsheet.</b></p>	<p>As noted in the PPS response, there is one final remaining item which has been delayed due to the pandemic and continues to be on deck for successor bargaining. The district is preparing a proposal to provide targeted staffing, professional development, and incentives to work at designated high-poverty schools for educators. Although originally scheduled to begin in March 2020, successor bargaining for the PAT contract has been on hold while the parties address bargaining issues arising from comprehensive distance learning, limited in-person instruction, a variety of pandemic conditions, and, lastly, hybrid instruction. These topics began in April 2020 reached conclusion mid-March 2021. Successor bargaining, to include the topics identified for high-poverty schools, is anticipated to begin in May 2021. As the joint efforts will be a result of collective bargaining which has not yet happened, their results cannot yet be measured through teacher turnover.</p> <p>It is worth noting that particular attention to high poverty schools occurs in the transfer, assignment, and layoff processes to provide greater stability to staffing. Each year, the contract provision in the PAT CBA that allows PPS to make an exception to seniority preference so that the racial diversity of staff can more closely reflect the racial diversity of the school's students. PPS uses these exceptions if a school has a reduction in their staffing allocations. When the racial balancing exception to seniority is utilized, the educator of color is retained at that school over an employee with more seniority but is not a person of color. This results in less turnover and increases the experience of educators of color in those schools.</p> <p>While not a joint effort with PAT at this time, educator experience is reported annually to ODE through regular state reporting, and staff and administrator climate questions were added to the Successful Schools Survey. See responses to Recommendation 18 and 19, above.</p>
21	<p>While working to improve instructional quality, address other obstacles that create inequities at high-poverty schools. Strategies include changes to attendance rules, boundary changes, and practices that could encourage retention of high-quality principals and teachers at high-poverty schools, such as additional pay, enhanced training, and additional classroom support.</p>		<p><b>1. Are principals also included in the proposal to add incentive pay for educators at high poverty schools, or does the proposal just apply to teachers?</b></p> <p><b>2. Did the University of Virginia professional development with principals and teachers continue despite the COVID-19 disruption? Will it continue in the 21-22 school year?</b></p>	<p>1. We do not have a formal proposal to change the compensation model for principals at high poverty schools at this time.</p> <p>2. Yes, we continued this partnership virtually throughout the 2020-21 school year. We are renewing the partnership for the 2021-22 school year to build upon our progress from this school year and hope to be able to have some sessions in-person.</p>
22	<p>Ensure consistent performance evaluation depth and quality by training administrators to set high expectations and improve the depth of reviews. Periodically review evaluations for quality.</p>	<p>Prior to the pandemic, central teams provided feedback through instructional walks, frequent informal school and classroom visits, leadership mentoring, coaching, and customized support for principals and leadership teams across all school sites. A cross-functional OSP and HR team conducts a quality review and coaching process for evaluations.</p> <p>While the beginning of the pandemic led to the delay of teacher evaluations, PPS and PAT worked together this fall to create a comprehensive distance learning evaluation tool in alignment with Oregon Department of Education guidance. Administrators received training on the new tool in October and evaluations are continuing.</p>	<p><b>1. The same text about implementation beginning "to improve the depth and quality of all performance evaluations" appears in the district's original response and the follow-up response. Where has been done thus far?</b></p> <p><b>2. What specific work have the OSP, HR, and other central teams done since the original audit in reviewing performance evaluations and in training administrators to improve reviews?</b></p>	<p>In addition to the details provided in the prior response, training for building administrators on teacher performance evaluations jointly created and presented by OSP and HR has occurred every year. This school year, it occurred in October on the new evaluation tool specifically created in collaboration with PAT and in alignment with ODE guidance issued for evaluations in distance learning. The prior year, it was provided in multiple sessions at the annual pre-service Leadership Institute in early August for all building administrators, with additional sessions provided early in the fall. Also, beginning in December and continuing through February, OSP and HR target performance evaluations with low ratings to provide additional support and feedback.</p>
23	<p>Regularly track teacher and principal turnover and the number of initiatives at schools and publicly report on it, with a particular focus on high-poverty schools.</p>	<p>[Excerpt] The district has enhanced its tracking of teacher and principal turnover, with a particular emphasis on measuring our goals of racial diversity. This data is available publicly. In addition, the district is rolling out additional questions in its annual school climate survey, scheduled for January, to include administrator perspective and experience on working conditions.</p>	<p><b>1. Please send evidence of enhanced tracking of principal and teacher turnover that includes detail of turnover at high poverty/Title 1/CSI/TSI schools and a public web link, if available.</b></p> <p><b>2. Please send the survey questions for the survey that began in January, and survey results, if available.</b></p>	<p>1. Here is a <a href="#">link</a> to annual tracker of teacher and administrator turnover and turnover by race.</p> <p>2. Here is a <a href="#">link</a> to an initial summary of the results from the new questions for school leaders. We are currently conducting further analysis to inform next steps.</p>

24	Adopt policies and practices that ensure strong management of contract and grant performance, particularly for non-competitive contracts and initiatives directly serving students, including consolidating contract management responsibilities.		<p><b>1. Have there been changes in handling of non-competitive contracts?</b>  <b>2. Has there been contract management consolidation outside RESJ contract consolidation?</b>  <b>3. What contracts is the specialized Scope of Work being used for? Does it include instructional contracts, such as alternative education?</b>  <b>4. The SOWs for the three contracts approved in the Oct. 2020 board meeting - SEI, REAP, and NAYA - do not include outcome-based performance measures, instead including process-based measures such as number of students served and numbers of hours per student. Has or is the district going to include outcome measurements in these contracts? If it has not been done yet, when is it expected to occur? (May overlap with questions for Rec. 25.)</b>  <b>4a. Did the district analyze the performance of these contractors before issuing the new contracts? If yes, please send.</b></p>	<p>1. The District's largest previously directly negotiated contracts - with the RESJ partners - are no longer directly negotiated, as these were subject to a formal Request for Proposals process resulting in new contracts in 2020. There are still some directly negotiated contracts pursuant to PPS Public Contracting Rule 46-0525, which allows direct negotiation of personal services contracts in limited circumstances. These are subject to the same multi-step review process and Board approval (if over \$150,000) as other contracts. Note, however, that there have been no new directly negotiated personal services contracts over \$150,000 since January 1, 2020.  2. Contract management consolidation: The P&amp;C department is not aware of consolidation of contract management activities outside of the RESJ partnerships. Contract management duties are typically assigned by school or department according to subject matter expertise.  3. The specialized scope of work template is used for contracts originating in Central Office and involving the provision of direct, ongoing, intensive instructional and support services (e.g., mentoring, after-school programming, family outreach services) to students and families with the goal of raising student achievement. The vast majority of the qualifying contracts are the RESJ contracts, which do include this specialized template. Another qualifying contract utilizing this template is the Peace In Schools contract for provision of mindfulness studies classes in high schools. The current alternative education contracts were signed in 2016 and were renewable through 2021, according to the terms of the Request for Proposals. They include a much more extensive scope of work document necessary for the provision of an entire educational program, including statutory compliance and extensive performance measures, and that far exceeds the breadth and depth of our standard personal services specialized scope of work template. A new RFP for this work is underway now and the new contracts will also include an updated version of that <a href="#">detailed scope and performance measures for alternative schools</a>.  4. The Scope of Work includes both Outcome goals and activities as well as Output measures. RESJ is partnering with the Office of Systems Performance to develop a evaluation framework in the coming years.  4a. New contracts were issued utilizing information from the RFP.</p>
25	Use the strategic planning process to evaluate the most effective and efficient use of contracts designed to increase student performance.	While the beginning of the pandemic led to the delay of teacher c	<p><b>1. What is the status of the three performance measurement steps below? If not finalized, when are they expected to be completed? If drafted, please send evidence that the steps are in use:</b>  <b>1a. We developed a shared report form, convened contractors in November, and are working across our partners to develop a coordinated evaluation framework to measure and report success.</b>  <b>1b. Plan to use info other funders are collecting to track impact, including Meyer Memorial trust, Multnomah County, Oregon Community Foundation, and the Portland Children's Levy. Potential for shared reporting and contracting.</b>  <b>1c. District analysis, called for in the RESJ Partnership Investment Strategy, to conduct racial disparity analysis by served/not served for each school receiving RESJ contract services.</b></p> <p><b>2. What additional controls has the district implemented to ensure performance management of contracts for operating alternative schools?</b></p>	<p>1a. Partners are utilizing and reporting against the shared reporting framework. Partners are convened quarterly to review data and data is published on the PPS web site.  1b. PPS convened other education funders and shared data and our reporting framework. The collaborative of funders agreed to meet quarterly to review data.  1c. This is underway, however we are considering using 2021/22 SY as a better baseline given the disruptions of the pandemic.  2. The office of Systems Performance manages reporting and data analysis in partnership with the RESJ team. This year we increased the transparency of the performance management by publishing reporting on the PPS website and sharing with other funders <a href="https://www.pps.net/Page/15401">https://www.pps.net/Page/15401</a> scroll down to RESJ Partnership Strategies.</p>
26a (Board)	Building an effective common core curriculum based on state standards and ensuring adequate school support and accountability for performance.		<p><b>a. What is status of GVC? i.e. what has been implemented, what is under development, and what is set for future development?</b>  <b>b. Have GVCs for Language Arts, Math, Health, and Science been completed?</b>  <b>c. 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?</b>  <b>d. 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.</b></p>	<p>a. Over the last two years, PPS developed a comprehensive standards-based core curriculum across content areas, PreK - 12. The GVC includes comprehensive standards-based scope and sequences, recommended instructional units with high-leverage instructional practices, differentiated teaching strategies and rigorous student tasks with diverse learning needs; more recently, we have aligned and integrated digital instructional materials. The core areas of Math, Language Arts (foundational skills &amp; integrated language arts/social sciences), Health, and Science have been developed and implemented. Schools are expected to teach to the scope and sequence in these areas. The GVC in World Languages, Visual and Performing Arts, Physical Education, Library/Media, Career &amp; Technical Education electives, Climate Justice, Dual Language Immersion, and Social-Emotional Learning Community Meetings have been developed and are being piloted across the district. The next phase of implementation is to continue to iterate the units to better meet the needs of our students and educators, scale implementation of all content areas across the district, and strategically invest in high-quality, culturally responsive instructional materials and develop teaching practices that align with our GVC.  b. Yes.  c. The Office of Teaching &amp; Learning is collecting qualitative and quantitative data on implementation. OTL is also soliciting feedback on GVC implementation from educators and students across the district. With the move to virtual learning during the pandemic during the year, monitoring in-classroom implementation has been challenging. The Board has received briefs about the development and implementation of the GVC; however, additional memos and/or reports to update the Board, providing data, feedback, and a current status is an important next step.  d. We are implementing a comprehensive assessment system that includes summative, interim, formative, and diagnostic assessments. Data from our interim assessment, Measures of Academic Performance (MAP), and our summative assessments are shared with the Board of Education after each administration window.</p>
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.		<p><b>* 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.</b>  <b>* 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.</b></p>	

26c (Board)	Addressing inequities at high-poverty schools, such as high turnover, low teacher experience, and initiative overload.	<p>* 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.</p> <p>* Did the updates described in the original PPS response to the audit, copied below, occur? If yes, please link to documents.</p> <p>- 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.</p> <p>* Was the board briefed on the Audit Action Plan, as described in original response below? If yes, please link to meetings and documents:</p> <p>- 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.</p>
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.	<p>* 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.</p>
26e (Board)	Tracking and addressing teacher and principal issues with student discipline practices and priorities.	<p>* 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?</p> <p>* 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)</p> <p>* 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..</p> <p>* 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.</p> <p>* 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?</p> <p>* Has the board and/or a board committee discussed and/or been briefed on student discipline data - expulsions and suspensions - and discussed it?</p> <p>* Has the district established a clear referral process for students and staff. If yes, please provide documentation.</p>
26f (Board)	Improving control of purchasing card transactions, contract performance management, and the oversight of key contracts.	<p>* No additional board-specific p-card or contracting evidence needed</p> <p>* For board contract oversight:</p> <p>* 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?</p> <p>* A related question: For large contacts involving instruction or student/family support, when is the board reviewing contractor performance? Is the board reviewing performance annually? Is it reviewing it upon renewal?</p> <p>* 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?</p> <p>* Does the board review any non-competitive contracts under \$150,000?</p> <p>* 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.</p>

issue	Investigation		19-20 Contract		Auditor Analysis	Auditor Questions	Evidence/Comments
	PDF Page	Contract Language Cited	PDF Page	Language in 2019-20 Contract			
1	147	Personnel Files: "With the exception of items which are duplicates of those in the District [personnel] file, evaluation materials. ...and other official records, materials in the supervisor's building file, including Letters of Expectation, shall be removed when the supervisor or the professional educator is transferred."	Removing documents upon transfer prevents the district from discovering a pattern of inappropriate behavior. ... Letters of expectation document that an educator has been made aware of certain District policies, directives, or procedures. ... Building files should remain intact and be passed on to all future supervisors.	7	No Change: With the exception of items which are duplicates of those in the District file, evaluation materials as described in the Portland Public Schools Handbook for Professional Growth and Evaluation, and in-service records, and other official records, materials in the supervisor's building file, including Letters of Expectation, shall be removed when the supervisor or the professional educator is transferred.  However, it is not clear that letters of expectation are the only documents in a building file that might pertain to concerns about sexual conduct (or other misconduct). The investigation report does not make this clear. Retaining this provision means that the remainder of the building file documents that weren't also in the personnel file would be eliminated.	* Are letters of expectation no longer kept in building files? * What other documents can be removed from building files?	As relates to the documents of concern in the Whitehurst investigation, all investigation reports, outcomes, and related discipline or letters of expectation are maintained indefinitely in the District's investigation file, also known as Origami. Origami maintains records of "Employee Incidents" by employee and is now the system of record for tracking alleged misconduct as reported and over time. Letters of expectation may be maintained in a supervisor's building file, but that file is not the personnel or investigation file of record. Pursuant to PAT Contract 26.2, letters of expectation "shall be removed when the supervisor or the professional educator is transferred," but that provision doesn't inhibit the District's tracking of employee behavior over time, across buildings, and under different supervisors through the investigation file/Origami. Also pursuant to section 26.2, documents other than evaluation materials as described in the Portland Public Schools Handbook for Professional Growth and Evaluation, in-service records, and other official records can be removed from building files when the teacher or supervisor is transferred.
2	149	Personnel Files: "A professional educator may request and have granted that any materials in the District personnel file (excluding evaluations and letter stating final disciplinary action) be removed from his/her file if after three (3) years of being written no subsequent similar entries have been made into the professional educator's personnel file." "Letters of Expectation shall be removed from a professional educator's building file three (3) years after the date of the Letter of Expectation."	Similar to removing materials from building files, this article cleans the slate for an educator who may, over time, exhibit a pattern of inappropriate conduct with students. Conduct that does not rise to the level of discipline should remain in files so a pattern can be detected if that educator engages in similar conduct in the future. Materials relating to allegations of an educator's sexual contact with students should not ever be removed from any files.	7	A professional educator may request and have granted that any materials in the District personnel file (excluding evaluations and letters stating final disciplinary actions) be removed from his/her file if after three (3) years of being written no subsequent similar entries have been made into the professional educator's personnel file.  26.8 Letters of Expectation shall be removed from a professional educator's <del>building</del> <b>official district personnel file three (3) six (6) years</b> after the date of the Letter of Expectation.	* Why did the district and PAT extend the retention period from three to six years instead of eliminating the ability to remove them as the investigation suggested? * Are there other documents pertaining to an educator's sexual conduct with a student, aside from Letters of Expectation, that could be eliminated under the three-year clause?	As described above, in partial response to the Whitehurst report and in consultation with the Whitehurst lead investigator, the District now maintains all documentation related to allegations and investigations of alleged sexual conduct in an electronic, searchable investigation file (Origami). Letters of expectation, which are not discipline, will be maintained indefinitely in the investigation file (Origami), so the agreement on their retention period in other sources does not impede the District's tracking, investigating, and monitoring allegations as they are reported and over time. PAT Contract section 26.7 allows for educators to request that materials, including final disciplinary action, in personnel files be removed if, after 3 years of being written, no subsequent similar entries have been made. Whatever documents an educator might request be removed from a personnel file related to sexual conduct allegations, they would not be removed from the investigation file/Origami, the system of record for those documents.
3	150	Professional Educator Rights and Just Cause: "... Letters of expectation may be placed in the building file. ... Letters in the Letter of Expectation file shall be organized District-wide by school year and shall be removed from the file after three (3) years."	Short shelf life of letters and maintenance at district office by school year rather than name of educator both protect educators, not students. A system that tracked letters of expectation by individual employee and did not remove these notices would improve the District's ability to adequately address complaints of educator sexual conduct.	3	23.9.2 Letters of Expectation <del>may shall</del> be placed in the <del>building</del> <b>official district personnel file. Letters of Expectation shall be placed in a District "Letter of Expectation" file maintained by the Human Resources Department. Letters in the</b> Letters of Expectation file shall be organized District-wide by school year and shall be removed from the <del>official district personnel</del> <b>official district personnel</b> file after <del>three (3) six (6)</del> years. Professional educators who have received a Letter of Expectation have the right to review any letters of expectation addressed to them in <del>the District Letter of Expectation file</del> and attach a response.	See above	See response above. It is important to note that the investment in and implementation of a centralized electronic filing system greatly improves the District's ability to maintain, track, and access the full history of sexual misconduct allegations and investigations, going above and beyond what was contemplated by the recommendations.
4	152	Complaint Procedure: "If the supervisor decides to proceed further with the written complaint, it shall be processed within ten (10) workdays of receipt under the following circumstances..."	In cases of sexual conduct, the District may not have sufficient time to process the complaint. We understand this provision to mean that the supervisor will notify the educator of a complaint in detail within 10 days, not that the complaint will be investigated in 10 days. Being fully prepared for this meeting may require more than 10 workdays. At a minimum, this deadline should be aspirational and not enforceable for a complaint of educator sexual conduct.	6	No Change: If the supervisor decides to proceed further with the written complaint, it shall be processed within ten (10) workdays of receipt under the following circumstances:	* Why did the district and PAT retain the 10-day processing time limit given the investigators' concerns?	School Compliance Officers, the building administrators that are designated to report allegations of sexual conduct, are trained to promptly call the Sexual Misconduct hotline (SMIH) in response to allegation of sexual conduct. The 10-day "processing" includes initiation of an investigation and notice to the employee regarding the nature of the complaint and if the District believes that they will be placed on Paid Administrative Leave for longer than 10 days. We do respond to sexual conduct claims promptly. In any event, the 10-day period in 25.4 doesn't require completion of the investigation. That timeline is governed by ORS 339.388. (In addition, the Complaint procedure in Article 25 of the PAT contract governs the behavior of an educator's "supervisor." 25.4 also is limited to articulated circumstances, most of which are not in play in addressing an allegation of sexual misconduct.)
153		Complaint Procedure: If the complaint is used in any manner to support actual or recommended discipline, administrative transfer, nonrenewal or dismissal, such record shall be placed in the personnel file and the complainant's name shall be disclosed if the unit member so requests.	Disclosure of complainant could lead to under-reporting of complaints and fear of retaliation by the educator accused of misconduct. Per the current contract, if the Districts intends to formally reprimand the educator based on a confidential complaint, the complainant's identity must be revealed upon request. Given this limitation to confidential complaints, it would be beneficial for the District to train on and strictly enforce the non-retaliation provisions of its complaint policies.	6	No Change: If, however, the complaint is used in any manner to support actual or recommended discipline, administrative transfer, nonrenewal or dismissal, such record shall be placed in the personnel file and the complainant's name shall be disclosed if the unit member so requests.	* Why did the district not change this language? * What has the district done to improve training and enforcement of non-retaliation provisions?	A change to this language was not agreed to with PAT, and the District cannot unilaterally change it. Even if this language were to change, the District is subject to Title IX provisions and PECBA case law requiring us to provide the name of complainants to the employee. The District has numerous policies that make clear that retaliation is strictly prohibited, and those policies are trained on regularly. The following policies expressly prohibit retaliation: Anti-Racist & Anti-Oppression Learning Communities 2.10.015-P; Anti-Harassment 4.30.060-P; Formal Public Complaints 4.50.032-P; Reporting of Suspected Abuse of a Child 4.50.051-AD; Affirmative Action 5.10.025-P; Workplace Harassment 5.10.060-P; Sexual Harassment Complaint Procedure 5.10.061-AD; Professional Conduct Between Adults and Students 5.10.064-P. Additionally, District staff receives annual training on Professional Conduct; Adult Sexual Misconduct; Title IX; Workplace Harassment; and Child Abuse Reporting.
155		Multiple files for misconduct include five files:	The multiple files, even if vigilantly maintained, make it difficult to track a complaint or concern from start to finish, for an educator's current and subsequent supervisors to "connect the dots," and for the public to gain access to files they may be allowed to see.	See below	The district appears to have eliminated the Letter of Expectation file, but the other four files remain.	* Why is the district retaining four separate files - doesn't this continue the risk of making a concern difficult to track from start to finish, as the investigators suggested for five files?	Please see responses, above, re implementation of investigation files/Origami, which is the system of record for investigations of alleged sexual conduct. Other files are irrelevant to the system of record and do not impede tracking of individual investigations and allegations of misconduct over time in that investigation file.

issue	Investigation		19-20 Contract		Auditor Analysis	Auditor Questions	Evidence/Comments
	PDF Page	Contract Language Cited	PDF Page	Language in 2019-20 Contract			
	155	1. Investigation File: Article 19.G.8 states, "The written notice of [a meeting that could result in disciplinary action or termination] shall not be placed in the professional educator's building file or personnel file but may be kept in an investigation file." Article 19.I.4 states, "The District shall place paid administrative leave letters in the investigation file, not in the professional educator's personnel file."	Part of multiple files issue noted above.	First Citation p 3 2nd Citation p 4	5 No change	<ul style="list-style-type: none"> <li>* Where is the investigation file kept? Do administrators/supervisors have access to it, or only HR personnel?</li> <li>* Are investigation documents also kept in the district's official personnel file?</li> <li>* How would a new supervisor or a district employee making a job recommendation know that there had been a complaint or investigation?</li> </ul>	See above re Origami. Administrators/supervisors do not have access to investigation files/Origami; only HR and Legal do. Investigation documents are not kept in personnel files. HR is the recipient and overseer of misconduct allegations in real time. If there is a recurring pattern of concerning behavior, this should be addressed at the time of the most recent allegation, not at the time a candidate moves. As each new allegation is made and documented, the employee's history of reported misconduct is reviewed and addressed accordingly. This addresses the concerns related to Whitehurst's employment history.
	155	2. Letter of Expectation File: Article 19.H.2 states, "Letters of Expectation may be placed in the building file. Letters of Expectation shall be placed in a District 'Letter of Expectation' file maintained by the Human Resources Department."	Part of multiple files issue noted above.	3	Reference to the Letter of Expectation file removed per cell F9 above.	All references to the Letter of Expectation file were eliminated in the 2019-20 contract per an auditor search for the term. This file appears to have been eliminated.	N/A.
	155	3. Building File: Articles 21 and 22 refer to the supervisor's building file and the constraints currently put upon maintaining documents in that file for any length of time.	Part of multiple files issue noted above.	3	Building file still in use, though does not contain letters of expectation per cell F9 above or written notice of a meeting or investigation determination (goes in investigation file per F16 above).	<ul style="list-style-type: none"> <li>* Do supervisors/building administrators have access to the district personnel file, investigation, and grievance files?</li> <li>* How would a new administrator or supervisor be aware that an educator they are supervising has had letters of expectation, complaints, grievances, or investigations in the past?</li> </ul>	Building administrators have access to personnel files, but not investigation or grievance files. A review of a personnel file will disclose recent discipline and letters of expectation. Any concerns they have about conduct under their supervision will be reported to HR, where the investigation, allegation, and discipline history will have been documented in Origami and reviewed by HR at the time of the new allegation.
	155	4. Personnel File: Article 22.A states, "There shall be one official District personnel file, which shall be maintained by the Human Resources Department."	Part of multiple files issue noted above.	7	Same language as noted by investigators.	Are complaints, investigation documents, and grievances included in the personnel file?	Final discipline is contained in the personnel file.
	155	5. Article 26.C.8 states, "All documents, communications and records dealing with the processing of a grievance shall be filed in a separate grievance file which shall constitute a 'personnel file,' within the meaning of the confidentiality provisions of ORS 342.850. Access to those files shall be limited to those with a valid business interest in the case."	Part of multiple files issue noted above.	23	Same language as noted by investigators.	File not eliminated. Per references in investigation report, grievances can be used in sexual conduct cases (e.g. pdf 97 - the grievance process may deter principals from formal discipline.)	N/A and see above responses.



