



Siletz Valley School

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To: Lincoln County School District Superintendent, Dr. Majalise Tolan and the LCSD School Board and Kristin Miles OSBA
From: Siletz Valley School Principal/Acting-Superintendent, Debra Barnes

Siletz Valley School appreciates the opportunity to provide this update and respond to the identified areas of concern. Our staff, students, Board of Directors, and community remain firmly committed to our mission of providing a safe, welcoming, and high-quality educational environment where all students can thrive. As a public charter school, we value our partnership with the Lincoln County School District and recognize the importance of maintaining full compliance with state and contractual expectations.

Since the January 30, 2026 notice, the school has taken significant and measurable steps to address the identified concerns. The majority of items have been resolved or are in active stages of implementation, supported by strengthened internal systems, clearer protocols, and ongoing monitoring processes designed to ensure sustainability and continued compliance. Our focus extends beyond meeting minimum requirements; we are committed to building durable systems that support long-term student success and organizational effectiveness.

SVS respectfully asserts that it has demonstrated substantial compliance, good faith corrective action, and ongoing system improvement. The evidence supports continued operation under the charter with monitoring, rather than termination.

The following table outlines each area of concern, along with Siletz Valley School’s response and the corresponding supporting documentation and evidence.

Area of concern	March SVS Update	Supporting Documentation
<p>1 <u>ML/EL Plan</u></p> <p>SVS stated that an ELL plan was not applicable; however, all schools should have an ELL plan ready in case a student enrolls who qualifies for services. ELL students now attend SVS and current ELL plan implementation must be monitored.</p>	<p>A completed SVS ML/EL plan was submitted to ODE for <u>approval on February 22, 2026</u>. SVS understands the need and importance of such a plan being in place for its students. SVS was part of a cohort with ODE for assistance with the ML/EL plan beginning August 15, 2025. As of March 25, 2026, the review process has begun and SVS is working on updates to the plan. As of February 18, 2026, SVS is receiving the Language Use Survey file from LCSD, as needed in the ML/EL plan. <u>SVS is following the ML/EL plan.</u></p>	<ul style="list-style-type: none"> • SVS ML/EL Plan • Email to ODE for ELL Plan • ML/EL Timeline • Email from ODE Confirming Rcpt

SVS Response to OSBA comment:

SVS acknowledges that formal approval from ODE is pending; however, substantial compliance has been achieved. The school:

- Submitted a complete ML/EL plan to ODE (Feb 22, 2026)
- Is actively engaged in ODE’s review process

- Has begun implementation in good faith

Under Oregon and federal law, the standard is provision of services, not merely approval status. Evidence shows:

- Systems for identification (Language Use Survey)
- Service delivery aligned to draft plan

- Participation in ODE-supported cohort

Position:

This represents good faith compliance and active remediation, not willful noncompliance. Any deficiency is procedural and in the process of state approval, not a failure to serve students. Moreover, while SVS has prepared a plan and is awaiting approval of such plan by ODE, the charter agreement requires compliance with ORS 336.079 – 336.082, and rules adopted by the State Board of Education for implementing these statutes. SVS is in compliance with the requirements of the applicable statutes and rules and therefore is in compliance with the charter agreement. Handbooks will be updated once the plan is approved.

2 Teacher Licensure

Teachers' licensure has continued to be found out of compliance with TSPC. All teTeacher licenses must be compliant with TSPC and charter law at all times, effective immediately.

SVS is in compliance with TSPC licensure requirements and the charter. SVS compiles all educator license expiration dates at the beginning of each school year into a spreadsheet that is monitored by the Superintendent. In addition, SVS implemented Frontline for the 25-26 school year. This system tracks credentials and alerts employees and administrators at 90, 60, and 30 days before expiration.

- [Teacher Licensure](#)

SVS Response to OSBA comment:

- Active monitoring systems (Frontline + internal tracking)
- Proactive renewal notifications

Position:

Fully compliant. No ongoing violation exists.

3 Bylaws and Policies

Bylaws need to be updated. While this has been in process, it is unclear whether it has been completed and if bylaws

Bylaws were updated on May 2024 and are on the school website. This concern is resolved. SVS will continue to collaborate with OSBA to ensure compliance.

- [SVS Bylaws 2024](#)

<p>and policies are maintained and publicly accessible. A copy of the updated bylaws must be provided to LCSD, and all bylaws and policies must be updated and accessible to the public.</p>		
<p>SVS Response to OSBA comment:</p> <ul style="list-style-type: none"> • Updated and publicly posted bylaws (May 2024) • Is actively working with OSBA for refinement <p>Importantly:</p> <ul style="list-style-type: none"> • No evidence of harm, governance failure, or operational breakdown • Concerns cited are technical legal drafting issues, not functional noncompliance <p>Position:</p> <p>SVS disagrees that this issue constitutes a failure of charter compliance. SVS is working with legal counsel to further update the Bylaws to ensure alignment with state law to the extent further revisions are needed or recommended.</p>		
<p>4 Facility Concerns</p> <p>Facility concerns reported to LCSD by the SVS Board on May 5, 2025 included: Leaking ceilings, old pipes throughout the building, football grandstands are nearly condemnable, gyms are badly out of repair and need new siding (and likely more), ADA access needed, rusty fences, old heating (boiler needs to be replaced), single pane windows, doors that don't properly lock if active shooter protection is needed, bathrooms throughout need upgrading (like in LCSD schools). Pursuant to the charter and lease agreements, SVS is responsible for the maintenance and upkeep of the facility. In 2024, LCSD provided SVS with a long-term facility study. It is SVS' responsibility to develop, implement, and monitor its own long-term facility maintenance plan.</p>	<p><u>SVS has a Facility plan and received approval to move forward with accessing funding from LCSD.</u> SVS has completed an RFP for siding and roof repair. This will be presented at the April 2, 2026 Special Board Meeting. SVS is working with LCSD Facilities and Maintenance on the spending of the \$250,000 Construction Excise Tax funds.</p>	<ul style="list-style-type: none"> • Siletz Facility Plan • Draft RFP for April approval

SVS Response to OSBA comment:

SVS has demonstrated **material progress and active implementation**, including:

- Completed long-term facilities plan
- Submitted RFP
- Secured access to funding (Construction Excise Tax)
- Active coordination with district facilities team

Delays must be viewed in context:

- Capital improvements inherently require **phased, funded implementation**
- The charter does not require **immediate remediation of all capital deficiencies**, but rather a **plan and progress**

Position:

SVS is in **active compliance through implementation of a facilities plan**. Remaining concerns relate to **timeline and funding constraints**, not neglect or refusal.

5 Grants and Budgeting

Deliverables and required reporting (federal and state grants, and district programs) continue to be untimely, necessitating repeated reminders from LCSD staff. All reporting deadlines must consistently be met and documented.

SVS has corrected their internal miscommunications about budgeting and grant submissions are up to date. Personnel in charge of assisting with grant submissions will be reporting timelines during our weekly administration meetings, to ensure deadlines are met.

- [HDT Grant, Outdoor School](#)

SVS Response to OSBA comment:

SVS has:

- Corrected internal systems
- Established weekly monitoring protocols
- Brought all reporting current

Legally, compliance determinations must consider current status, not solely historical issues.

Position:

Legally, compliance determinations must consider current status and whether prior deficiencies or lack of compliance has been cured, which they have. Historical non-compliance, particularly where such alleged non-compliance occurred before charter renewal or have otherwise been fully cured, are insufficient to provide a basis for charter termination.

6 Academic Performance

Although a comprehensive plan to improve academic performance is in place, focused particularly on the areas which caused the State to designate SVS as a Targeted Support and Improvement School (TSI), most results have remained at Level 1, based on 2023-2024 ODE reporting. TSI results must show adequate improvement either through an increase to a Level 2 in all categories or similar progress on a nationally normed, locally administered, internal assessment (EasyCBM, Acadience, SBAC, DIBLES, iReady, etc.) Benchmarking and progress monitoring from local assessments must be reviewed with LCSD administration quarterly.

SVS has a Continuous Improvement Plan for 2025-2027. Benchmark data was shared with the SVS School Board twice during the 24-25 school year. During this 25-26 school year, data has been shared through the Superintendent Report, but a formal presentation is scheduled for April, 28, 2026. SVS uses Renaissance STAR data (ODE approved) for benchmark testing. Although our Reading scores are low, they are improving year after year, by cohort. Our Math scores continue to stay low, so we contracted with the Teacher Development Group to make three visits and work with math teachers on planning, teaching and reflection. The SVS mClass, or DIBELS, data shows improvement from the previous year. STAR data and mClass data is provided to families during conferences. SVS is currently working with LBLESD on improving writing. The SVS Instructional Leadership Team (ILT) has been working with teachers to focus on specific writing skills on a weekly basis.

- [Continuous Improvement Plan](#)
- [Spring25 STAR Board Report](#)
- [Jan25 SuperBoardReport](#)
- [Dibels \(mClass\) MOY-2 year](#)
- [MOY 23-26 STAR Data](#)
- [Nov25BoardReport](#)
- [Teacher Development](#)

SVS Response to OSBA comment:

SVS disputes characterization of noncompliance:

- A multi-year Continuous Improvement Plan (2025–2027) exists
- Multiple valid assessment systems are in use (STAR, DIBELS)
- Documented growth trends, particularly in reading

Key legal point:

- Statute requires progress OR improvement, not immediate Level 2 status

Additionally:

- District requirement for universal Level 2 may exceed statutory baseline
- Growth data demonstrates good faith progress under TSI designation

Position:

SVS is meeting the legal standard of improvement efforts and documented progress. This is a performance issue, not a compliance violation.

7 Attendance

SVS previously established a goal to increase attendance. However, as of June 2025, SVS' regular attendance rate was 39.9%. An improvement plan must be drafted and submitted to LCSD. The plan must be comprehensive and may include strategies such as specific parent outreach, modification of the school day and/or school year calendar, and dedication of resources to ensuring that students are attending school. The plan must include specific dates for implementation of each component, as well as specific quantitative targets and dates for meeting each of those targets.

SVS has adopted and implemented an Attendance plan and processes to track and improve student attendance. SVS has been conducting weekly attendance meetings since February 25, 2026. The meetings include the principal, attendance clerk, registrar, student success advisor and TAPP coordinator on a regular basis (HELP coordinator will be attending regularly after break). SVS has included LCSD attendance mentor, LBLESD Regional Improvement and Engagement Liaison (HSS Grant), Indian Education Education Specialist and Superintendent, when available. SVS created an Attendance Framework that is more indepth and comprehensive than the initial plan turned into LCSD in August. SVS Attendance Clerk contacts each family that has an absent student and logs that information, so we can review trends. SVS is currently working with the Attendance Mentor about the nudge letters and how they can be updated with language to encourage improved attendance. SVS has made changes in how students are greeted that encourages a sense of belonging. SVS recognizes the generational trauma of school and seeks help from CTSI and TAPP to encourage our families with the lowest attendance percentage to remove barriers. SVS met with the Waldport Principal on March 3, 2026, to discuss what changes they made that are making a difference. The SVS attendance team will present those ideas to staff after Spring Break.

- [SVS 25-26 AttendanceFramework](#)
- [Attendance Mtg/Agendas](#)
- [Attendance Staff Memo](#)
- [Att Strategy Map](#)
- [Attendance Log example](#)

SVS Response to OSBA comment:

SVS has:

- Implemented a comprehensive attendance framework
- Established weekly attendance meetings
- Documented outreach (call logs)
- Increased attendance rates from baseline

Legal distinction:

- Compliance requires implementation of a plan, not immediate performance outcomes

Position:

SVS is in compliance through implementation and monitoring systems. Performance improvement is ongoing and demonstrable.

<p>8 Graduation Rate</p> <p>While the SVS graduation rate had been reported by ODE at 100%, due to other metrics reported and the fact that SVS has been designated as a Targeted Support and Improvement School, the accuracy of this information needs to be verified and any supporting evidence must be cited and documented. The 2023-2024 graduation rate reported by ODE was 67%. The 9th Grade On Track rate was 78% (an improvement from the 2022-2023 rate of 28%). Both of these data points need monthly monitoring and documentation.</p>	<p><u>SVS's On Track and Graduation rate has increased per the ODE 24-25 report card.</u> SVS has a 9th Grade On Track Team that began meeting weekly on February 5, 2026. The On Track team created a framework and actionable items to help students stay on track for graduation. SVS uses the new analytics systems in Synergy and has been working with Ross Davis at LBLESD to create a tracking sheet for all teachers to be able to use when working with their students. The On Track team has been reviewing tools accessible to all 9th graders that will aid in their success. This team will expand to include all HS grades after the start of 4th quarter. A February 3, 2026 memo to SVS teachers advised that grades are required to be entered weekly. The team will work with TAPP to ensure that grades can be seen/monitored.</p>	<ul style="list-style-type: none"> • Course Tracker/Student • 9th Grade on Track Minutes • SVS 9th Grade Framework • 9th Grade on Track - ODE •
<p>SVS Response to OSBA comment:</p> <p>SVS has:</p> <ul style="list-style-type: none"> • Implemented tracking systems (Synergy analytics) • Established 9th Grade On-Track team • Instituted weekly monitoring and staff accountability <p>Data discrepancies:</p> <ul style="list-style-type: none"> • Reflect reporting methodology differences, not intentional misreporting • Are being actively reconciled <p>Position:</p> <p>SVS is compliant with monitoring and reporting requirements, with continuous system improvements underway.</p>		
<p>9 Financial Reporting</p> <p>SVS must ensure that financial reporting is timely. Long-term financial health indicators continue to need to be examined. It is uncertain if grant funds, Siletz Tribal Charitable Trust and Charter Equity are budgeted accurately for the 2025-2026 school year. Updated budget documents must be submitted with a narrative providing clarity around anticipated funds.</p>	<p><u>SVS has an up to date budget.</u> SVS submitted the 25-26 budget to LCSD on June 17, 2025. Budget amendment documents were sent to LCSD following the March 17, 2026 SVS Board Meeting. STCT and Charter Equity grants continue to be budgeted accurately. HDT grant has been spent and invoiced to LCSD, as of March 26, 2026.</p>	<ul style="list-style-type: none"> • HDT and Outdoor School • Budget Email June2025

SVS Response to OSBA comment:

SVS:

- Submitted updated budgets
- Corrected grant allocations
- Demonstrates strong liquidity and cash reserves

Audit findings:

- No indication of insolvency or misuse of funds
- Concerns relate to long-term planning, not compliance failure

Position:

Currently compliant and financially stable, with appropriate corrective actions taken.

10 Public Meeting Law

Oregon Public Meetings Laws must be followed, including but not limited to timely meeting notice and agenda publication, public posting of minutes, and recordings of meetings. From this point forward, SVS must document its compliance for every board meeting, and submit this documentation to LCSD on a monthly basis.

SVS is aware of the requirements of Oregon Public Meeting law and will comply with the same. SVS is in the process of updating and maintaining the School Board Meeting page online. Many meetings and recordings have been updated to the website since March 5, 2026. Changes made have been so that minutes are now taken by one person and recordings are posted the day following the meeting.

- <https://siletzvalleyschool.spicialdistrict.org/school-board>

SVS Response to OSBA comment:

SVS has:

- Updated website postings
- Implemented next-day recording publication
- Centralized minute-taking procedures

Legal standard:

- Requires substantial compliance and correction upon notice

Position:

SVS is in active remediation and current compliance trajectory. Any deficiencies are technical and being corrected, not systemic violations.

<p>11 Discipline</p> <p>SVS staff have demonstrated a lack of understanding in student management and discipline procedures, including up to suspension and expulsion. Immediate concerns have been raised in understanding manifestation needs, Oregon weapons laws, the ability to investigate complaints about student behavior, and due process. Monthly discipline data and investigation notes must now be reviewed by building administration and LCSD district staff.</p>	<p><u>SVS continues to follow board policies regarding discipline.</u> SVS administration has been working with LBLESD, COSA, and OSBA mentors, along with LCSD to ensure compliance with all discipline procedures and due process. A discipline committee has been formed to review policies, referrals and to create processes and systems that assist students with restorative practices and accountability.</p>	<ul style="list-style-type: none"> • Student Handbook • Discipline Mtg Minutes
<p>SVS Response to OSBA comment:</p> <p>SVS has:</p> <ul style="list-style-type: none"> • Participated in training (LCSD, LBLESD, OSBA) • Established discipline committee • Aligned practices with board policy <p>Key legal point:</p> <ul style="list-style-type: none"> • Standard is capacity and implementation, not perfection of documentation language <p>Position:</p> <p>SVS is actively compliant and improving systems, with no evidence of systemic denial of student rights.</p>		
<p>12 Special Education</p> <p>Although LCSD provides the special education instructional staff, SVS administration is still responsible for the proper implementation of special education processes. LCSD has provided training to SVS administration, but the required manifestation determination information was not provided to LCSD staff running a manifestation meeting, and emails were not responded to in a timely manner to support the team. SVS administrators must attend all special education training that takes place with LCSD administrators. All emails from LCSD special education staff must be responded to within 24 hours.</p>	<p><u>Manifestation Determination training was attended with LCSD on February 26, 2026.</u> SVS understands the importance of the manifestation determination meetings and is committed to working with the Special Education Department to ensure that all communication is responded to in a timely manner.</p>	<ul style="list-style-type: none"> • LBLESD Training Flyer • Discipline Training Invitation Response

SVS Response to OSBA comment:

SVS:

- Attended required manifestation determination training
- Is coordinating with district-provided SPED services
- Has committed to communication timelines

Important legal distinction:

- LCSD provides SPED staff → shared responsibility model
- No documented denial of FAPE (Free Appropriate Public Education)

Position:

Evidence shows good faith compliance and collaboration. Any gaps are procedural and being addressed, not violations of IDEA.

Cybersecurity - (added by OSBA)

This concern was not included in the January 30, 2026 letter

The charter contract says the following: “SVS at its own expense, agrees to take adequate steps to ensure the security of its technology systems which have connections to District’s technology systems, including but not limited to student information systems, online curriculum, accounting systems and any other electronic data storage system that may expose the personally identifiable information of District students or staff.”

SVS:

- Acknowledges deficiencies
- Has committed to corrective actions\
- Tech Department is now LCSD IT

Legal framing:

- This is a technical compliance area requiring remediation, not immediate grounds for termination unless unaddressed

Position:

In the remediation phase with commitment to compliance.