



ANALYSIS OF SILETZ VALLEY SCHOOLS COMPLIANCE

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Association

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Executive Summary

On January 30, 2026, the Lincoln County School District (LCSD) issued a letter to Siletz Valley Schools (SVS) detailing areas of noncompliance. The letter also informed the school that this correspondence constituted a 60-day notification of intent to terminate the contract as required by ORS 338.105(2)(a).

At the request of the Lincoln County School District, I conducted an analysis of the history of noncompliance, the requirements in the contract, and evidence submitted by SVS to demonstrate compliance. The goal of this report is to provide a third-party analysis of the charter school's compliance with district requirements prior to the board taking action on termination of the contract. The report is organized by topic.

Note: This report and the recommendations contained within represent a professional administrative analysis and do not constitute legal advice. Before taking any formal action on a charter contract, the district should consult with legal counsel.

Report organization

This report is organized by the list of concerns outlined in the January 30, 2026 letter from LCSD to SVS, which served as the 60-day termination notification. Each section contains a timeline of events, the evidence of compliance submitted to LCSD by SVS, and an analysis of the evidence compared to the requirements.

English Learners

District concern from January 30, 2026 letter:

“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 the current ELL plan implementation must be monitored.”

- October 2023: The district first notified SVS of its concerns about the school's ability to support English Learners.
- July 21, 2025: The district sent a letter restating the concern and the school's noncompliance with this requirement.
- August 21, 2025: SVS told the district that a plan was in draft.
- January 30, 2026: The district sent another letter restating the concern and the school's noncompliance with this requirement.
- February 22, 2026: SVS emailed ODE a draft plan following ODE's template. They asked ODE to expedite its review or to let the LCSD superintendent know that it was completed.
- The unapproved plan is currently posted on the SVS website. In the plan, SVS notes that a barrier to service for EL students is that they do not have a consistent enough number of EL/ML students to keep procedures and trainings up to date.
- Service to English learners is addressed in the 2024-25 family handbook posted on the website (there is no current year handbook). It states: “Students whose primary language is a language other than English will be provided appropriate assistance until they are able to use English in a manner that allows effective, relevant participation in

regular classroom instruction. Parents who are not able to use English in a manner that allows effective, relevant participation in educational planning for their student will be provided with relevant written, verbal, or signed communication in a language they can understand.” The handbook does not include information on:

- The mandatory Home Language Survey (HLS) or the required timeline for identification.
- The handbook states assistance continues until students can participate “effectively,” but it fails to cite the Oregon English Language Proficiency Assessment (ELPA).
- The federal requirement to provide Notice of Program Placement within 30 days.
- “Meaningful access”.

These elements are addressed in the draft (unapproved) plan but are not currently communicated to families in the handbook.

Analysis

The school does not currently have an approved EL plan and has not had one for at least several years of operation. The district has been communicating this requirement for almost three years. All charter schools must have a plan to serve EL students, and Section 4(K) of the charter contract requires the charter school to follow ORS 336.079 through -082. This section appears to be noncompliant.

Teacher licensure

District concern from January 30, 2026 letter:

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

- The district found SVS to be in compliance with this requirement at the beginning of the 2025-26 school year.

Bylaws

District concern from January 30, 2026 letter:

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

- October 2023: The district first notified SVS of its concerns about the school’s bylaws.
- July 21, 2025: The district sent a letter restating the concern and the school’s noncompliance with this requirement.
- While the district found this section to be compliant in its letter on January 30, 2026 due to the fact that SVS had posted their bylaws on their website, my analysis reveals several areas of potential concern:
 - The bylaws state that, should the charter school close, its assets will be distributed to the district and to other nonprofits. ORS 338.105(6)(a) states the

assets that were purchased with public funds shall be given to the State Board of Education.

- The bylaws do not address how the board votes, the board's requirement to follow public meetings laws, its responsibility to hire an administrator, and conflicts of interest.

Analysis

At the LCSD March 11, 2026 meeting, SVS stated that the school was in compliance with this requirement. Prior to determination of compliance, I recommend that the district consult with legal counsel.

Facilities

District concern from January 30, 2026 letter:

“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.”

- October 2023: The district first notified SVS of its concerns about the state of its facilities.
- October 2024: LCSD provided SVS with a long-term facility study.
- July 21, 2025: The district sent a letter restating the concern and the school's noncompliance with this requirement.
- On August 21, 2025 SVS stated that it would have a facilities plan submitted by October 31, 2026.
- October 30, 2025: Two years later, the school submitted a facilities plan.
- December 18, 2025: The school notified LCSD that it had not made progress on the plan but would connect with the district for help in crafting the RFP.
- January 21, 2026: SVS told the district it had not yet connected with district staff.
- January 30, 2026: The district sent another letter restating the concern and the school's noncompliance with this requirement.
- On February 25, 2026, SVS told the district that it had received training about the RFP process and were working to get accurate building measurements.
- March 2026: The school submitted a long-term facilities plan.
 - 2025-26 plans include replacing damaged wood siding and painting the exteriors of buildings, repainting interior walls, upgrading exterior door hardware for code compliance, and installing window coverings on unsecured windows.
 - 2028-29 plans include addressing the boiler.
 - 2032-33 plans include replacing the electrical panels in the gym.

- By winter of 2025, all the components of the one-year plan were to be completed but were not.
 - The long-term plan does not address requirements for ADA access.
- At the March 11 LCSD board meeting, the school said it would submit an RFP for the district to review by March 16.
- March 31: the school submitted their RFP for consideration as part of this evaluation. While the RFP identifies that the project is subject to BOLI prevailing wage, specifies materials, and offers a site walkthrough, the following concerns remain:
 - The RFP states: "[i]f underlayment is not suitable SVS will pay extra to repair". This could create a financial risk. Without a defined unit price (e.g., "\$X per square foot of plywood replaced"), the school potentially has no control over the cost of these repairs once the siding is removed.
 - The RFP asks for pricing and timeline but does not explain how the school will choose the selected contractor. Without a scoring rubric (e.g., 50% Price, 30% Experience, 20% Schedule), the process is less transparent and potentially more vulnerable to bid protests.
 - Requesting that the project start "As Soon As Possible" is problematic for school operations. It does not specify whether work can happen while students are on campus or if it must be completed before a certain date.
 - While the RFP mentions a Public Works bond, it is silent on General Liability and Builder's Risk insurance. If a contractor accidentally causes a fire or structural damage during the roof removal, the school's own insurance might be at risk if the contractor isn't properly covered.

Analysis

SVS has been out of compliance with district requirements since at least 2023. The plan it submitted does not address all the district's concerns and defers several of the requirements for years. Some requirements are not addressed. SVS has not met its own timelines for addressing these concerns. The RFP is incomplete or vague in several areas and could potentially attract risk to the school. This section appears to be noncompliant.

Deliverables

District concern from January 30, 2026 letter:

"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."

- October 2023: The district first notified SVS of its concerns about its untimely deliverables.
- July 21, 2025: The district sent a letter restating the concern and the school's noncompliance with this requirement.
- On August 21, 2025 SVS stated that it had restructured its administrative team and it was current with federal, state, and tribal requests.
- January 30, 2026: The district sent another letter restating the concern and the school's noncompliance with this requirement.

- February 25, 2026: SVS said that grant documentation would be submitted the next day, the budget was designed to be conservative, and the audit was complete.
- At the March 11 LCSD board meeting, SVS stated that it was in compliance with this requirement. The school said that the last of the HDT funds were used to fund additional curriculum and the business manager, and that they would send documentation to the district to close the HDT grant. They said financial reports were submitted to the district on March 5.

Analysis

SVS has been out of compliance with district requirements since at least 2023. While the school appears to have complied with the reporting requirements recently, historical lack of compliance should be taken into account when determining if this section meets standard.

Academic Performance

District concern from January 30, 2026 letter:

“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, DIBELS, iReady, etc.) Benchmarking and progress monitoring from local assessments must be reviewed with LCSD administration quarterly.”

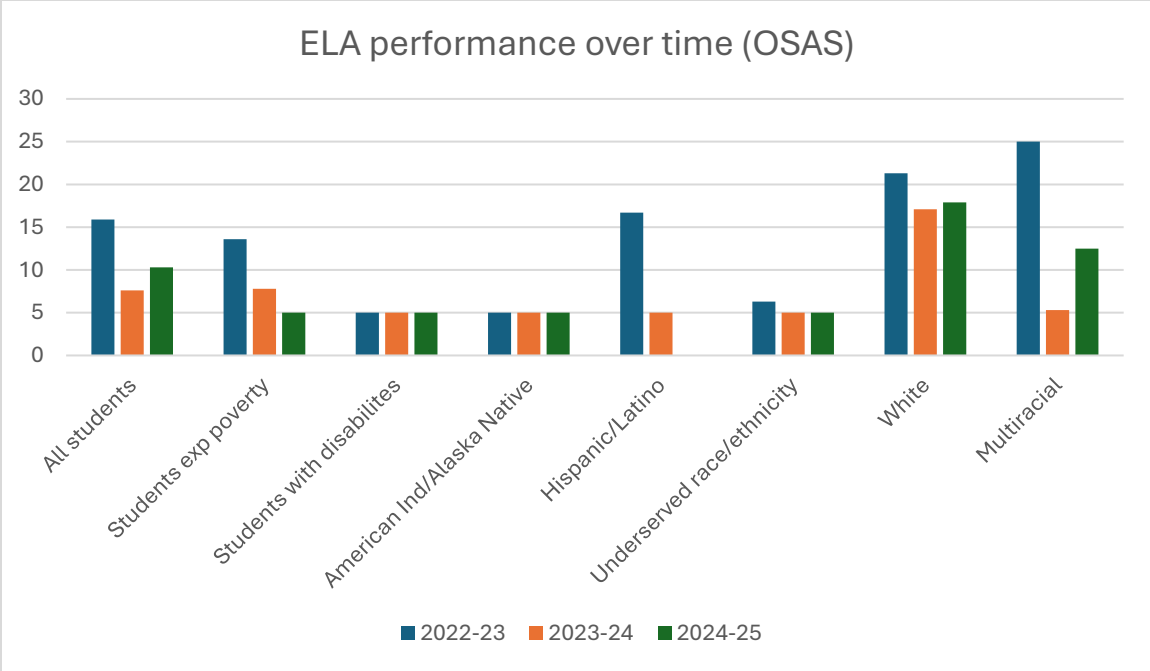
- October 2023: The district first notified SVS of its concerns about its academic performance.
- July 21, 2025: The district sent a letter restating the concern and the school's noncompliance with this requirement.
- On August 21, 2025 SVS stated that it was working on a plan.
- December 18, 2025: The school said a CIP was in place, there was a math specialist reviewing instruction once a quarter, and the school superintendent was coaching teachers.
- January 21, 2026: At a check-in with the district, there was discussion of continued lack of an academic performance plan, implementation, progress, and monitoring.
- January 30, 2026: The district sent another letter restating the concern and the school's noncompliance with this requirement.
- March 2026: The CIP submitted by SVS as evidence was a 2024-25 plan.
- At the March 11 LCSD board meeting, SVS stated that it was in compliance with this requirement and needed to write the 2026-27 plan. No 2025-26 plan was submitted. SVS said it would have a submitted plan by March 30, 2026.
- March 31, 2026: The school stated that it has made progress in reading year over year in STAR testing, math is low, so they have contracted with the Teachers Development Group, they are working with LBLESD to address writing, and DIBELS data shows improvement from the previous year. New information the school submitted:
 - A February 2025 presentation showing mixed results from 2023-24 to 2024-25 in STAR, and a cohort analysis for MOY testing that showed mostly negative trends. Growth was shown in Houghton-Mifflin Harcourt (HMH) math between

- BOY and MOY in both the 2023-24 and 2024-25 school years. Students made progress in HMH math between BOY and EOY in 2024-25. The report was a pdf of a presentation, and some pages were illegible.
- A DIBELS benchmark performance report drawn in March, which showed the MOY comparisons between 2024-25 and 2025-26. Data reflected the following:
 - Whole school data showed growth in 7 of 8 measures.
 - Kindergarten data showed the percentage of students well below benchmark was higher in 2025-26 in 3 of 5 measures.
 - First grade data showed the percentage of students well below benchmark was higher in 2025-26 in 2 of 7 measures.
 - Second grade data showed the percentage of students well below benchmark was higher in 2025-26 in 5 of 6 measures.
 - Third grade data showed the percentage of students well below benchmark was higher in 2025-26 in 4 of 6 measures.
 - Fourth grade data showed the percentage of students well below benchmark was higher in 2025-26 in 0 of 3 measures.
 - Fifth grade data showed the percentage of students well below benchmark was higher in 2025-26 in 1 of 3 measures.
 - Sixth grade data showed the percentage of students well below benchmark was higher in 2025-26 in 0 of 3 measures.
 - The superintendent's progress report to the board on school goals from January 28, 2025. The report noted that 7 of 26 goals had been completed.
 - The superintendent's progress report to the board on school goals from February 25, 2025. The report noted that 7 of 26 goals had been completed.
 - A report on STAR data that compared MOY between 2023-24, 2024-25, and 2025-26. Growth was shown in all areas between 2023-24 and 2025-26 in reading. In math, 7 of 11 areas saw a decrease in performance between 2023-24 and 2025-26.
 - An undated report showing growth in the percentage of students' scores that had improved from BOY to EOY.
 - A progress report on the 2024-25 CIP. Goal attainment was positive in some areas and mixed in others.

Analysis

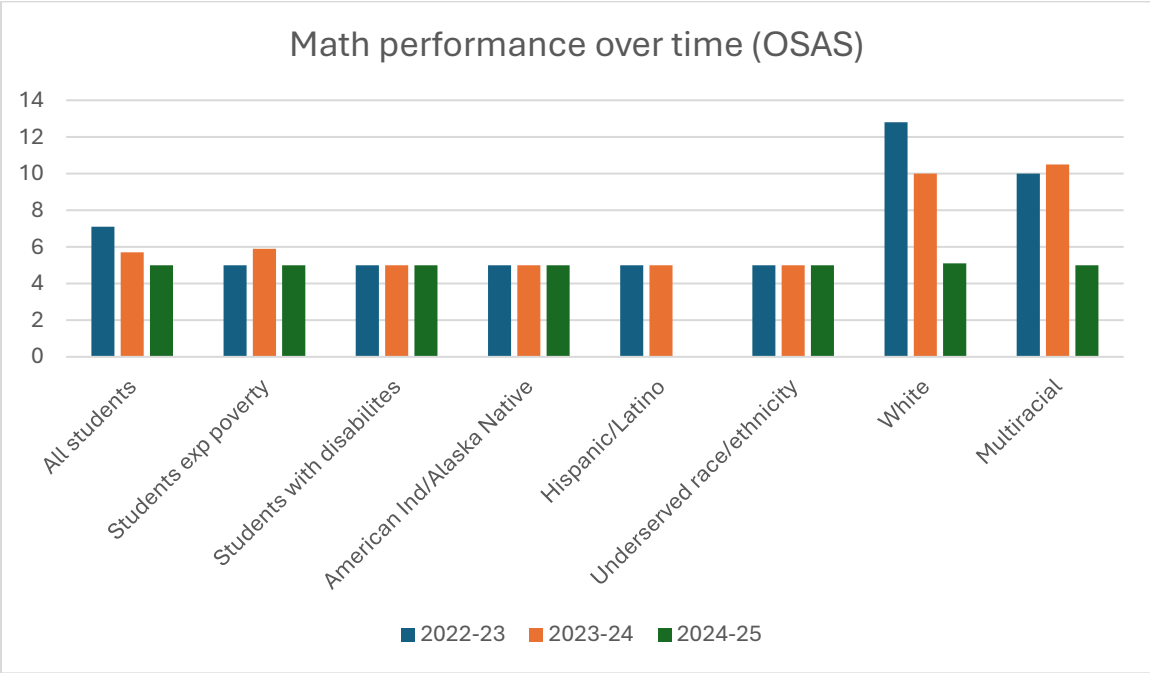
SVS has been a school identified for Targeted Support and Intervention since 2021-22. Given that the school is at Level 1 in many areas of the state report card, the district has required that all areas be at Level 2, or the school needs to show progress on internal assessments.

The following graphs represent the school's performance reported on the state report card since the 2022-23 school year, disaggregated by student group:



(No reportable data for Hispanic/Latino students in 2024-25.)

The school was rated Level 1 in ELA for all student groups except White students rated at Level 2.



(No reportable data for Hispanic/Latino students in 2024-25.)

The school was rated Level 1 in Math for all student groups except White and Multiracial students rated at Level 2.

For many student groups, there has been no progress over time. For others, performance has decreased since 2022-23.

For internal assessments, growth data has been mixed.

At the March 11 LCSD board meeting, the school said it was in compliance with this requirement and needed to write the 2026-27 academic performance plan. Given the school's low performance over time and lack of a required current plan, this section appears to be noncompliant.

Attendance

District concern from January 30, 2026 letter:

“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.”

- October 2023: The district first notified SVS of its concerns about its attendance.
- June 2025: SVS’s attendance rate was 39.9%.
- July 21, 2025: The district sent a letter restating the concern and the school’s noncompliance with this requirement.
- August 21, 2025: SVS said that staff met on August 18 to review data, the school was getting coaching from ODE, and they were working directly with TAPP.
- November 3, 2025: SVS sent the district a plan to improve attendance.
- December 15, 2025: District staff and TAPP met with SVS to discuss the attendance plan and tracking and reengagement systems that were not in place.
- December 18, 2025: The school said it was beginning attendance meetings and would send the calendar of these meetings to the district superintendent.
- January 21, 2026: The district reviewed the November plan and found that it was not implemented and that attendance teams were not meeting.
- January 30, 2026: The district sent another letter restating the concern and the school’s noncompliance with this requirement.
- February 25, 2026: The school reported that it had held an attendance meeting that day, and administration would be holding staff accountable for documentation of plan implementation. The district required an updated attendance plan, documentation of procedures, examples of call logs, and a written directive outlining teacher expectations.
- February 26, 2026: There was confusion about calculation of attendance since the school follows a block schedule.
- March 2026: The school reported that regular attenders had increased from 39.9% to 46.6% since August. The 2025-26 goal set by SVS for regular attenders is 45.5%, which

is the lowest in the district. According to a report generated by the district, the attendance rate was 39.1% in February.

- At the March 11 LCSD board meeting, SVS stated that incentive programs had been in place since March 5, systems were in place, and attendance would be part of the CIP. SVS stated it was in compliance with this requirement.
- March 31, 2026: The school submitted attendance meeting agendas from Feb 25, March 4, March 11, and March 18 as well as attendance call logs from March 17, and a brief “Attendance Strategy Map” that provided strategies for Tiers 1, 2, and 3. Some of these strategies were vague; for example, “positive school climate” and “collaborative attendance plans”.

Analysis

SVS has been out of compliance with this section for almost a year, according to the documentation reviewed for this report, and the district has stated its concerns about performance in this area since 2023. A plan submitted by the school in November was not implemented. The percentage of regular attenders is the lowest in the district and data directly from the school does not appear to be accurate. The school submitted a plan in March and a staff memo outlining teacher expectations. Regular attendance meetings began in late February and call logs were provided. While the school appears to have complied with the reporting requirements recently, low performance and historical lack of compliance should be taken into account when determining if this section meets standard.

Graduation

District concern from January 30, 2026 letter:

“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.”

- October 2023: The district first notified SVS of its concerns about its graduation rate.
- For the 2023-24 school year SVS reported its graduation rate as 100%, but ODE data showed it as 67% with 9th grade on-track being 78%.
- In 2025, ODE reported graduation rate as 80% and 75% 5-year completion.
- July 21, 2025: The district sent a letter restating the concern and the school’s noncompliance with this requirement.
- December 2025: Some students had no grades entered into Synergy.
- December 18, 2025: The school said it would hold a meeting on January 23 and would be looking at spelling and vocabulary, and administration would be observing teachers in the classroom.
- January 30, 2026: The district sent another letter restating the concern and the school’s noncompliance with this requirement.

- February 25, 2026: The school reported a graduation rate of 67%, which the district felt was more accurate. They stated that staff duties were being reassigned to focus on 9th grade on-track.
- The district required the school to submit agendas and minutes of meetings regarding graduation, and documented action plans.
- March 2026: The school submitted a sample course plan for a student with credits completed and needed. SVS also submitted minutes for 9th grade on-track meetings from February 5, 12, and 19. They submitted a Freshman Success Framework detailing the roles and responsibilities for the principal, team lead, and the success team.
- At the March 11 LCSD board meeting, SVS stated that they were in compliance with this requirement.
- March 31, 2026: The school submitted the ODE report regarding 9th grade on-track percentages. ODE reports that over 95% of students were on track in the 2024-25 school year.

Analysis

The district has stated its concerns about performance in this area since 2023. The school recently submitted required plans. However, there are still concerns about how the school reports data and the accuracy of the data reported. One example of this is a reported percentage of 9th grade on track of over 95% when considering that the graduation rate is 67%. If these figures are accurate, the district should require the school to conduct an analysis of this gap. While SVS appears to be in compliance with the district's requirements, the district should consider auditing how the school inputs student data and how often.

Financial reporting

District concern from January 30, 2026 letter:

“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 (STCT) 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.”

- October 2023: The district first notified SVS of its concerns about its financial reporting.
- July 21, 2025: The district sent a letter restating the concern and the school's noncompliance with this requirement.
- August 21, 2025: SVS stated that its financials were not being reported, they had not received the new charter Equity grant amount and were pausing consumable spending and leaving a Charter Equity position open.
- January 30, 2026: The district sent another letter restating the concern and the school's noncompliance with this requirement. It also noted that the school accepted a check from CTSI for a new wrestling room that was a violation of the lease and had to return it.
- February 10, 2026: The district requested updated budgets and corrected CSI/TSI funding.

- February 25, 2026: SVS said it was considering transferring business services to LBLESD. The district reminded the school that CSI/TSI allocations required correction and directed them to consult with ODE.
- March 5, 2026: SVS submitted updated budgets and corrected CSI/TSI funding.
- March 2026: The school submitted an undated letter stating they had sent an invoice for Outdoor School expenses. They committed to send a bill to the district for items bought for HDT.
- At the March 11 LCSD board meeting, SVS stated that they were in compliance with this requirement.

Analysis

The district has stated its concerns about performance in this area since 2023. The following information is taken from an analysis of financial audits from 2025, 2024, and 2023:

The auditor noted that the school did not submit a management letter in 2023, 2024, or 2025.

The school exhibits strong short-term liquidity and a robust cash position, as evidenced by a current ratio of 7.09 and 177 days of unrestricted cash on hand.

However, the long-term financial outlook is more complex. The school maintains a high debt-to-asset ratio of 0.90, indicating a highly leveraged position that may limit future borrowing capacity or facility improvements. Furthermore, while the school shows a healthy multi-year cash flow, the current fiscal year saw a negative cash flow of \$327,437 and a total margin of 0.3%.

The school appears currently stable due to significant cash reserves, but the combination of high leverage and a recent shift toward negative cash flow warrants close monitoring to ensure long-term fiscal sustainability is not compromised. While the school appears to have complied with the reporting requirements recently, historical lack of compliance should be taken into account when determining if this section meets standard.

Public meetings laws

District concern from January 30, 2026 letter:

“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.”

- July 21, 2025: The district sent a letter stating the concern and the school’s noncompliance with this requirement.
- August 21, 2025: SVS said they had a new website as of August 5 and had posted everything that was required. They also noted that they had received training by OSBA on August 13.
- December 18, 2025: The district sent a reminder restating the concern and the school’s noncompliance with this requirement.
- January 21, 2026: The district sent a reminder restating the concern and the school’s noncompliance with this requirement.

- January 30, 2026: The district sent another letter restating the concern and the school's noncompliance with this requirement.
- At the March 11 LCSD board meeting, SVS stated that they were in compliance with this requirement.

Analysis

No public virtual links to the meetings are posted as of the writing of this report (ORS 192.670 (3)(a)). Minutes do not contain votes by name for each board member (ORS 192.650(1)(c)). Minutes are minimal and do not provide information as to the substance of the conversation for agenda items; they appear to be an expanded agenda (ORS 192.650(1)(d)). This section appears to be noncompliant.

Student discipline

District concern from January 30, 2026 letter:

“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.”

- December 18, 2025: The district and the school discussed the school's judgment in applying discipline and the district noted that the school lacked a discipline matrix.
- January 30, 2026: The district sent another letter restating the concern and the school's noncompliance with this requirement.
- February 20, 2026: The school held a meeting regarding discipline. Minutes of the meeting noted discussion of relationships and reviewing policy.
- February 26, 2026: The district provided training on disciplinary procedures for SpEd students.
- March 2026: The school submitted a link to its handbooks and a discipline meeting on February 20 as evidence of compliance. The handbook is from 2024-25 and nothing additional has been posted.
 - The staff handbook states: “Each student who is being provided educational services through an Individualized Education Program (IEP) is subject to public charter school discipline regulations unless, as provided by law, specific behavioral concerns are addressed as part of the student's IEP. Teachers are expected to work cooperatively with special education staff to resolve any concerns regarding the conduct and discipline of a student with disabilities.”
 - Concerns regarding this statement include:
 - The handbook fails to mention the mandatory requirement under OAR 581-015-2420 to conduct a manifestation determination within 10 school days of any decision to change the placement of a child with a disability because of a violation of a code of student conduct.
 - By characterizing the management of students with disabilities as a “cooperative” effort between staff, the handbook could be seen to misrepresent a mandatory legal obligation as a professional suggestion. IDEA requires that the school *must* implement the behavioral

- interventions and supports as written in the IEP, not as a discretionary or "cooperative" resolution.
- The family handbook states: "When considering student disciplinary procedures that may result in removal of the student, the school follows all special education and 504 plan procedures and ensures the parent and the student are afforded the procedural safeguards of the Individuals with Disabilities Education Act (IDEA) if:
 - The student is receiving individualized education program (IEP) services;
 - The student has not yet been identified as a student with a disability but the district had knowledge that the student had a disability and needed special education. For more information, please refer to SVCS Policy: JGDA/JGEA & JGDA/JGEA-AR"
- Concerns regarding this statement include:
 - While the handbook mentions following "504 plan procedures," it fails to explicitly state that students with 504 plans are entitled to a manifestation determination review for disciplinary changes in placement, just like students with IEPs.
 - The handbook's criteria for students "not yet identified" may imply that the school must have already concluded the student needed special education.
- At the March 11 LCSD board meeting, SVS stated that they were in compliance with this requirement.

Analysis

The district's concerns include the school's lack of understanding of suspension, expulsion, manifestation requirements, Oregon weapons laws, and due process. The evidence presented by SVS is not sufficient to determine compliance with this requirement. The district should seek legal advice.

Special education

District concern from January 30, 2026 letter:

"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 trainings that take place with LCSD administrators. All emails from LCSD special education staff must be responded to within 24 hours."

- January 30, 2026: The district sent a letter stating the concern and the school's noncompliance with this requirement.
- March 2026: As evidence of compliance, SVS submitted a flyer from LBLESD on safety training and an email that was an invitation to a February 26 meeting on discipline considerations training. SVS noted that the principal attended this meeting. The school superintendent did not.

- At the March 11 LCSD board meeting, SVS stated that the school superintendent was enrolled in an LBL threat assessment workshop scheduled for April 28 and 29 and that they were in compliance with this requirement. The district should seek legal advice.

Analysis

No evidence was submitted to demonstrate that SVS is submitting manifestation determination information, or that responses to LCSD special education staff is timely. The evidence presented by SVS is not sufficient to determine compliance with this requirement. The district should seek legal advice.

Cybersecurity

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.”

- March 2026: The district conducted a cybersecurity verification based on PACE insurance requirements. SVS was out of compliance with these requirements.
- Ten areas were examined in the verification process; SVS was found noncompliant in 8 of 10 areas.

Analysis

While the SVS administration agreed to follow up on a number of the noncompliant areas, this contract requirement appears to be noncompliant.

Conclusion

A comprehensive review of the evidence presented and the historical record since 2023 indicates a persistent pattern of systemic noncompliance at Siletz Valley Schools. While the school has recently submitted various documents following the January 30, 2026, notice, these submissions do not appear to remediate long-standing deficiencies in critical operational areas.

The school remains out of compliance with high-stakes requirements that impact school-wide systems and student services, notably in cybersecurity, facilities maintenance, and special education/discipline protocols. Additionally, SVS has not demonstrated a sustained ability to meet fundamental obligations regarding English Learner services or Oregon Public Meetings Law.

From an organizational standpoint, a charter school is expected to maintain consistent compliance throughout the contract term. The evidence of recurring missed deadlines, inaccurate data reporting, and unimplemented improvement plans suggests that SVS currently lacks the administrative capacity to meet the performance and compliance standards established in its charter contract.

Note: This report and the recommendations contained within represent a professional administrative analysis and do not constitute legal advice. Before taking any formal action on a charter contract, the district should consult with legal counsel.