



**District Administration Office**  
**Mr. Sean Gallagher – Superintendent**  
629 Easy Street  
Brookings, OR 97415  
Office: 541 469-7443  
Fax: 541 469-6599  
Email: seang@brookings.k12.or.us  
www.brookings.k12.or.us

## Memo

Date: 12/27/2017  
To: Board of Directors  
From: Sean Gallagher – Superintendent  
Cc:  
Re: Division 22 Standards

Annually, each school superintendent in the State of Oregon is required to communicate to the community the current status of Oregon Administrative Rules (OAR) Division 22 Standards within their school district. These standards cover 55 different areas of compliance. This is the second year in a row that all 55 standards are to be assessed. Oregon Department of Education (ODE) normally chooses a few strategic areas to focus. The district continues to make excellent progress with implementing Division 22 Standards properly, not just meeting bare minimums. There were three areas I declared as non-compliant last year, these were:

1. **OAR 581-022-1350 Alternative Education Programs;**
2. **OAR 581-022-1430 Asbestos Management Plans;**
3. **OAR 581-022-1440 Human Sexuality Education.**

All three of these areas are now in compliance. ODE has renumbered the OARS to the following:

1. **OAR 581-022-2505 Alternative Education Programs;**
2. **OAR 581-022-2230 Asbestos Management Plans;**
3. **OAR 581-022-2050 Human Sexuality Education.**

To bring the district into compliance, the actions were taken:

1. **OAR 581-022-2505 Alternative Education Programs:**
  - a. Utilized an ODE Toolkit for Alternative Education Program Evaluation to clearly define state law expectations regarding alternative education programs in accordance with ORS 336.615-336.665;
  - b. Combined OPTIONS and Pacific Bridges into one program entitled Community Bridges (see attached memorandum dated 7/13/17 from Lisa Dion and the Community Bridges brochure). This program fully complies with Division 22 Standards and referenced ORS's above;
2. **OAR 581-022-2230 Asbestos Management Plans:**

- a. The district has updated the asbestos management plan and is currently training pertinent staff along with annual updates on asbestos management;
- 3. OAR 581-022-1440 Human Sexuality Education:**
- a. After further evaluation, the district simply reinforced existing curriculum and re-identified that this curriculum is relevant for grades 6-12 only, not earlier grades as previous legislation had directed.

### **Non-Compliance**

There is one particular area that the district is in non-compliance of, and that is annual instructional time as defined in OAR 581-022-2320. The district is short 20 hours for Kindergarten and 30 minutes grades 1-3 for the 2017-18 school year. The district was able to bargain increases in instructional time for the 17-18 school year with another upgrade scheduled for the 18-19 school year from good faith bargaining with Brookings Harbor Education Association (BHEA). Unfortunately, the delayed start of one week at the beginning of the school year caused by The Chetco Bar Fire caused the district to dip down into a deficit as described above. Due to the impact of the fire on the community, the Board of Directors asked myself (Superintendent Gallagher) to approach the Oregon State Board of Education requesting a one year waiver to minimize further impact of this natural disaster (see attached letter of request to Dr. Salam Noor – Deputy Superintendent of Public Instruction dated 10/6/17). The Central Curry School District joined BHSD17C in this request since they had a similar impact to their community. The Oregon State Board of Education approved our request for a one year waiver on 12/07/17 (see attached letter from Emily Nazarov – Acting Government and Legal Affairs Manager). This approval allows the district to move forward without changing instructional calendars with further impact to the community caused by the fire. I can assure you that teachers are well aware of this situation and are continuing to work hard to meet academic standards within the allotted time. I have faith in their abilities and our students to achieve great outcomes.

**Division 22**  
**Standards for Public Elementary and Secondary Schools**  
**2017-2018 Assurances**  
**REPORT TO COMMUNITY**

This list is provided to assist you in your report to your community as required by [OAR 581-022-2305](#).  
Please **do not** submit this form to the Oregon Department of Education.

- ✓ Determine your district's compliance with the Oregon Administrative Rules (OARs) located in Chapter 581, Division 22. The OARs are available for review via the [Secretary of State's webpage](#).
- ✓ Identify areas of compliance and non-compliance by checking the appropriate boxes in the chart below. Districts should report to their communities on each of the standards listed below.
- ✓ Report your district's compliance or non-compliance to the Division 22 Standards for Public Elementary and Secondary Schools to your local district school board by **February 1, 2018**.

OAR Number	Title	Compliance Status	
		Yes, in compliance	No, not in compliance
<a href="#">581-022-0102</a>	Definitions	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-0620</a>	Test Development	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-1512</a>	Child Development Specialist Programs	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-1910</a>	Exemptions	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-1920</a>	Waivers and Permission	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2000</a>	Diploma Requirements	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2010</a>	Modified Diploma	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2015</a>	Extended Diploma	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2020</a>	Alternative Certificate	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2025</a>	Credit Options	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2030</a>	District Curriculum	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2045</a>	Prevention Education Programs in Drugs and Alcohol	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2050</a>	Human Sexuality Education	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2055</a>	Career Education	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2060</a>	Comprehensive Guidance and Counseling	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2260</a>	Records and Reports	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2265</a>	Report on Physical Education Data	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2100</a>	Administration of State Assessments	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2110</a>	Exception of Students with Disabilities from State Assessment Testing	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2115</a>	Assessment of Essential Skills	<input checked="" type="checkbox"/>	<input type="checkbox"/>

OAR Number	Title	Compliance Status	
		Yes, in compliance	No, not in compliance
<a href="#">581-022-2120</a>	Essential Skills for English Language Learners	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2130</a>	Kindergarten Assessment	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2205</a>	Policies on Reporting of Child Abuse	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2210</a>	Anabolic Steroids and Performance Enhancing Substances	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2215</a>	Safety of School sports -- Concussions	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2220</a>	Health Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2223</a>	Healthy and Safe Schools Plan	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2225</a>	Emergency Plans and Safety Programs	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2230</a>	Asbestos Management Plans	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2250</a>	District Continuous Improvement Plan	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2255</a>	School and District Performance Report Criteria	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2270</a>	Individual Student Assessment, Recordkeeping, Grading, and Reporting	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2300</a>	Standardization	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2305</a>	Operating Policies and Procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2310</a>	Equal Educational Opportunities	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2315</a>	Special Education for Children with Disabilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2320</a>	Required Instructional Time	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<a href="#">581-022-2325</a>	Identification of Academically Talented and Intellectually Gifted Students	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2330</a>	Rights of Parents of Talented and Gifted Students	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2335</a>	Daily Class Size	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2340</a>	Media Programs	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2345</a>	Auxiliary Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2350</a>	Independent Adoptions of Instructional Materials	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2355</a>	Instructional Materials Adoption	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2360</a>	Postponements of Purchase of State-Adopted Instructional Materials	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2370</a>	Complaint Procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2400</a>	Personnel	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2405</a>	Personnel Policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2410</a>	Teacher and Administrator Evaluation and Support	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2415</a>	Core Teaching Standards	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2420</a>	Educational Leadership – Administrator Standards	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2430</a>	Fingerprinting of Subject Individuals in Positions Not Requiring Licensure...	<input checked="" type="checkbox"/>	<input type="checkbox"/>

OAR Number	Title	Compliance Status	
		Yes, in compliance	No, not in compliance
<a href="#">581-022-2440</a>	Teacher Training Related to Dyslexia	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2500</a>	Programs and Services for Talented and Gifted Students	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">581-022-2505</a>	Alternative Education Programs	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Districts must report their status with regards to the Division 22 Standards to their communities by**

**February 1, 2018**





**BROOKINGS-HARBOR**  
"Every Student Can Succeed"

## District Administration Office

629 Easy Street  
Brookings, OR 97415  
541 469-7443  
Fax 541 469-6599  
[www.brookings.k12.or.us](http://www.brookings.k12.or.us)

October 6, 2017

Dr. Salam Noor  
Deputy Superintendent of Public Instruction  
Oregon Department of Education  
255 Capitol Street NE  
Salem, OR 97310-0203

Dear Dr. Noor:

The Brookings-Harbor community endured a devastating fire event this last August-September called the Chetco Bar Fire. This incident which rose to the #1 fire priority in the nation evacuated most all of the surrounding area around Brookings-Harbor communities including thousands of homes and displacing multiple families, staff, and students for quite a few weeks. The event carried with it the threat of burning Brookings-Harbor proper. The school district facilities suddenly became a 500 member firefighter encampment literally overnight for a couple of weeks since all other readily available areas were under the mandatory evacuation requirement. This event attracted a lot of attention including visitations from Governor Brown, Senator Merkley, and media coverage including a meaningful OPB Think Out Loud show featuring myself and a local reporter telling the story of how the community was dealing with the fire event including the interruption to the school district. The Gold Beach community including Pistol River residents endured similar issues.

The reason I am writing this letter to you is to express a board approved request to forgive the instructional time requirements for the 2017-18 school year only. The school district had to delay the start of the school year by five days to ensure that enough staff were present to start

the school year and allow the firecamp time to find an alternative sight so we could accommodate students on campus. This delay caused our school district to dip below the instructional time requirements by 30 minutes for grades 1-3 and 20 hours for Kindergarten. The board voted to make this specific request to Oregon Department of Education (ODE) to minimize any additional interruptions to the school district and community as evacuation orders were only recently lifted and families have been finally allowed to return to their homes.

Air quality procedures were concurrently created and implemented in partnership with Oregon Health Authority (OHA) and Oregon School Activities Association (OSAA) as the first week back to school included very unhealthy levels of smoke, limiting staff and student activities including moving athletic events to other communities with better air quality. In summary, this community has been traumatized by this fire event. Any attempt to make up the lost instructional time would require utilizing winter, spring, and/or summer breaks which families have already made plans based upon the original instructional calendar. The district will also be conducting the second & third of three successive seismic retrofit projects, any further push into the June calendar to makeup lost instructional time would result in greater difficulties of completion for Fall 2018.

We would appreciate your consideration of this request. The district takes instructional time seriously and has made significant improvements through bargaining recently by increasing instructional time. The impact of the Chetco Bar Fire has been very difficult for this community. A one year only waiver would be extremely meaningful to all involved. Please don't hesitate to contact me if I can be of any help.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sean Gallagher', written in a cursive style.

Sean Gallagher  
Superintendent





# Oregon

Kate Brown, Governor



**OREGON**  
**DEPARTMENT OF**  
**EDUCATION**

*Oregon achieves . . . together!*

**Colt Gill**

Acting Deputy Superintendent of Public Instruction

Sean Gallagher  
Brookings Harbor School District  
629 Easy Street  
Brookings, OR 97415

**BY EMAIL ONLY**

December 13, 2017

Re: Division 22 Waiver

Dear Superintendent Gallagher,

I am writing to inform you that on December 7, 2017, the Oregon State Board of Education approved your district's request for a one-year waiver of the Division 22 standard OAR 581-022-2320 Required Instructional Time.

For purposes of the 2017-18 Division 22 Assurances, please report "out of compliance" and note in the comment section that your district has been granted a waiver.

Sincerely,

Emily Nazarov  
Acting Government and Legal Affairs Manager