

Student Count Requirements for 18-21 Year Old Students

School districts in Colorado have developed creative ways of providing flexible community based transition services to students with disabilities aged 18-21 who require services past the typical senior year of high school. In some cases, confusion about policies, practices and documentation requirements related to 18-21 year old students has resulted in the loss of Per Pupil Operating Revenue (PPOR) to districts. The information in this document is taken from the *Student Membership for the October Count, General Instructions and Guidelines* produced by the Auditing Unit of the Colorado Department of Education, the *Amended Rules for the Administration of the Public School Finance Act of 1994*, and from the *Joint Legislative Audit Committee Report on Postsecondary Education Options*. It is intended to provide information and guidance and is not a legal interpretation.

In Colorado, the majority of funding for schools comes from Per Pupil Operating Revenue allocated to districts based on an October 1 student count. Eligibility requirements for PPOR are outlined in the School Finance Act and apply equally to all students including students with disabilities. It is important that special education services providers work closely with the Special Education Director and the person who has responsibility for the October 1 student count for the district to ensure that practices are appropriate and that all necessary documentation is available.

October count requirements for students ages 18-21 are the same as for all other students. Students participating in district sponsored transition programs may be counted so long as the pupil meets all of the requirements for membership (enrollment and attendance). Community based services are an extension of school building based services and should be documented in the same way. Requirements for attendance, work study, independent study, and post secondary enrollment apply to all students.

Local school boards have the authority to set policies related to grading and credit, graduation requirements, conditions for awarding diplomas, and participation in graduation ceremonies. For 18-21 year old students who are being served through community based transition programs, the following requirements are necessary to ensure that students will be eligible for funding based on the October 1 count:

- The student has not been issued a diploma
- The student must be in membership
- The student must have an active IEP
- The student must be receiving credit toward high school graduation and a diploma
- The student must have a schedule as of October 1 that documents services provided directly by a teacher, counselor, para-professional, or related services staff or have been purchased or paid for by the district

It is important to consider district requirements for graduation, diplomas, and participation in graduation ceremonies as part of the comprehensive IEP planning process for each student. The decision for a student to receive community based educational services beyond the typical senior year should be made as part of an overall educational plan that will assist the student to meet his or her identified post-school outcomes. Projected dates of program completion need to be identified and student plans (IEPs) should clearly define expected outcomes and timelines to be met that would indicate the students' readiness to exit the school system through graduation.

Can students continue to be counted for PPOR if they have been issued a diploma?

NO. Once a student has officially graduated and received a diploma they cannot be counted for purposes of PPOR or special education funding. A written notice of the impending graduation and termination of the student's right to educational services should be provided to parents with sufficient time to challenge the decision. A sample notice is included with the Colorado State Recommended IEP forms available by accessing the CDE website.

Can students participate in graduation ceremonies and still be counted for PPOR?

YES, based on district policy related to participation. Many districts allow students to attend graduation ceremonies to symbolize the completion of school building based services. However, it is important to remember that this is a social graduation only. It is very important that you are clear with the family that this is merely participation in the celebration and not an official graduation. The student may be listed in the program with classmates. The student may not receive a diploma, the transcript remains active, and the student is not listed as a graduate on any district documentation. After the social event you may want to refer to the student as a transition student, an 18-21 year old student, or a student of a specific program. Do not refer to the student as a graduate, or a student receiving extended services.

Can the diploma be dated at the time of the social graduation?

NO. The diploma should be dated at the time the student actually exits the school district after program completion. Although students do not officially graduate, the student name may be provided to the school registrar for purposes of invitations to class reunions if that is important to the family.

What coding category should be used for students being served in 18-21 year old programs?

New coding categories have been added for student count and year end reports. For students who will receive services beyond the typical senior year, students will continue to be coded as 12th grade with an additional code designating Transition year 1, 2,

or 3. This will allow for more accurate coding of students.

Is there a specific type or amount of credit that needs to be awarded for transition services?

NO. Although students must continue to receive credits in order to be counted for PPOR, the type or amount of credit is not specified. This would be a district level decision. Your district could choose to award one credit per semester, one credit per year, or one credit for completion of an entire program. For some students, it may be most appropriate to spread the academic and elective credits that are required for a student to graduate across the anticipated years of school district participation. When determining course titles for credit and designation on transcripts, requirements related to non-discrimination and privacy must be considered.

Is there a specific type of schedule required?

NO. Schedules should be done like other students whenever possible. However, handwritten schedules are acceptable if they clearly describe where the student is for specified amounts of time. The critical factor is to make sure that the person in the district with responsibility for the October 1 count has sufficient documentation for each student.

How many hours must be documented?

The determination of full-time or part-time status is based upon the number of hours of pupil-staff contact time provided or paid for by the district. You must document 360 hours of service per semester to be eligible for the full PPOR. Half-time funding can be collected with a minimum of 90 hours of documented services per semester. A student receiving services under an IEP, but unable to benefit from a full-time program because of the disability, may be counted as a full-time student. A student who is participating only in work study or independent study may be counted as a maximum of half time regardless of the number of hours the student is scheduled to work.

Document the hours that a student is receiving services provided directly by a teacher, counselor, para-professional, or related services staff or services that are being purchased by the district. Purchased services might include vocational training, job development and job coaching activities

or independent living skills development contracted through a third party.

Since my students are in the community most of the time, will I need to account for that time?

YES. The amount of PPOR that a district will be eligible to collect for a student is based on the number of hours of service. You will need to provide documentation to show where the student is and the amount of time that a student is being provided purchased or direct services. This can be documented in the student schedule and by clearly describing special education services on the services page of the IEP. For students who are working for part of the day, you will need to have attendance logs, pay stubs, and/or logs of direct contact with the student to document the required amount of service hours to be eligible for PPOR. Make sure that the Pupil Count Coordinator in your district has a copy of the schedule, services page of the IEP, and other supporting documentation for each student that you will be counting.

If a student is working part of the day, can all of the student's work hours be counted as work study?

NO. For purposes of determining the number of hours of contact for students participating in work study, include the time of instruction and contact provided under the supervision of a certificated or licensed teacher. Only the work hours required to earn credit as defined in the individual student's schedule may be included. The work study program must be approved by the local board of education so it will be important to refer to district policies

For more specific information related to these questions, refer to the *Amended Rules for the Administration of the Public School Finance Act of 1994*, the *Student Membership for the October Count*, *General Instructions and Guidelines* produced by the Auditing Unit of the Colorado Department of Education, and the *Joint Legislative Audit Committee Report on Postsecondary Education Options*. For information related to coding for student count and year end reports, refer to the Automated Data Exchange link on the Colorado Department of Education website.

relating to work study requirements for instruction and supervision.

Can a student who is attending classes at the community college be counted for PPOR?

MAYBE. This depends on which system has primary responsibility for the student. If a student is taking one or two classes at the community college, the district is paying for or providing direct support services, and this is considered as part of the student's secondary education program, the hours may be counted for PPOR eligibility purposes. If the district is not paying for college classes or providing direct support services, the student would not be eligible to be counted for PPOR.

Is there a "5th year" option where students have their diploma withheld in order to attend college?

NO. Elimination of this type of program was a result of a performance audit conducted by the office of the State Auditor in 2000 and an agreement between the Commission on Higher Education and the Department of Education. The Legislative Audit Committee report clearly refuted the idea that high school students should deliberately delay high school graduation to obtain a year or more of college credits under K-12 education funding. There are two postsecondary enrollment options available to high school students, each option having clearly defined eligibility criteria and funding requirements. For information about the Postsecondary Enrollment Option requirements refer to the website for the Colorado Commission on Higher Education at <http://www.state.co.us/cche/students/index.html>.