



November 17, 2014

Members of the HB14-1382 Online Task Force,

HOPE Online Learning Academy Co-Op respectfully submits the following feedback to the HB14-1382 Task Force. We appreciate the commitment of all members of the Online Task Force to improve the quality of education for Colorado's online students.

As you work together to finalize your report to the General Assembly, we remind you, in the words of Elizabeth Davis from Calvert Academy, "a school is a school is a school." Online learning is a method of delivery that provides options for Colorado students. Just as traditional brick and mortar schools are unique; each Colorado online school is different. Online Schools are subject to the same accountability standards and reporting as all Colorado schools. The Colorado Department of Education is tasked to oversee our state's 179 local school districts. In turn, local school districts are required to oversee all schools in their district- traditional brick & mortar district schools, alternative schools, charter schools, contract schools, single district online schools and multi-district online schools. We remind the Online Task Force to consider the important role (autonomy) of Colorado's local school districts.

The following input is provided for your consideration:

- HB14-1382 moved the responsibility to authorize online schools from CDE to school districts. Thus, the Online Task force is required review best practices and recommend quality standards and practices for authorizers of multi-district online schools in Colorado.
- We strongly suggest the recommendations are developed in the form of GUIDELINES. HB14-1382 does not require statutory change and, frankly, statutory change would not be prudent as it does not give CDE or the local districts the flexibility to innovate to meet the needs of Colorado students.
- The rules developed must include a process that CDE should follow as authorizers are certified. We feel that it is critical that these rules recognize the responsibility of CDE to support innovation and accountability. Innovation cannot be achieved if the recommended rules are inflexible and overly prescriptive. Our observations of the Online Task Force discussions indicate that

this may be the current course. For example, the Online Task Force engaged in protracted discussions about specific resource requirements that a school district must possess prior to being allowed to authorize online schools. It is our opinion that the recommended guidelines should require a school district to demonstrate the resources they currently have or will develop to support their online schools as the online schools are established and grow. It is not prudent to develop rules that specify exact requirements as every online school is different and requires different levels of support.

- Further, HB14-1382 does not require that CDE rules dictate the exact process that an authorizing school district must follow as it authorizes multi-district online schools. It is important the GUIDELINES developed by the Online Task Force recognize the autonomy and responsibility of the Local school district. Online schools, like all schools in a local school district's portfolio, are the responsibility of the local school district. CDE is responsible for school district accountability; school districts hold their schools accountable. Just as CDE does not dictate the process that a local school district uses to oversee its traditional brick & mortar schools or charter schools, it is not the role of the Online Task Force or CDE to dictate the oversight process that an authorizing district must follow for its multi-district online schools.

Our observations of the Online Task Force discussion lead us to include that many members of the Online Task Force feel that local school districts are not capable of providing accountability and oversight for multi-district online schools. Rather than address the perceived problem that some local school districts are not meeting expectations, the perceived bias of many Online Task Force members have resulted in draft Authorizer Standards that remove all flexibility and autonomy from local school districts.

- Existing online schools were certified by the State Board of Education. After initial certification, CDE, the State Board and the General Assembly rely on the local school districts to oversee their multi-district online schools and to be responsible for their online schools' accountability. Multi-district online schools are included in each local school district's performance framework.

We strongly oppose the language in the current draft of the Authorizer Standards which includes the recommendation on page 7 regarding "Review and certification of all authorizer's (sic) currently overseeing multi-district online schools be completed on or before January 1, 2016." The unintended consequence of this language, without a Safety Clause, would shut down schools

and authorizers mid-school year if certification isn't completed. We propose that those districts that currently authorize certified multi-district online schools be automatically granted status as certified authorizers.

- The draft Authorizer Standards still need a considerable amount of work. HB14-1382 allows, but does not require, the Online Task Force to make additional recommendations concerning multi-district online schools and their authorizers. As considerable work remains relating to the Online Task Force's primary assignment: Authorizer Standards, we respectfully suggest that the Online Task Force suspend conversations about additional recommendations. "Scope creep" is apparent and certain Online Task Force members are using "other" as a bucket to address personal agenda items.

We support the direction of HB14-1382 to elevate the responsibility of multi-district online schools and our authorizers, but we caution the Online Task Force as they develop rules that are too prescriptive; unintended consequences must be considered. Evergreen Education Group's Keeping Pace 2014 awarded Colorado's fully online schools its highest rating at all three levels: elementary, middle and high school, based on the existence, attributes of programs, state policy and student population. The current direction of the Online Task Force causes concern that Colorado may create an over-regulated environment, one that discourages innovation and removes support for education entrepreneurship.

Thank you,

Heather O'Mara