

# Student October: What's New for Online Schools & Programs?

May 20, 2024

- Student October Count Overview
- Student October Count Audit Resource Guide
  - Funding Requirements
  - Audit Documentation Requirements
  - Clarification to the Online School and Program section
- Brief update on changes in the new Board Rules for brick-and-mortar schools
- Brief updates on the At-Risk Count & English Language Learner (ELL) Count
- Additional Resources
- Contact Information
- Questions

# Introduction

- An “Online School or Program”:
  - Is a Colorado online public school or online program
  - Is operated by a Colorado school district or BOCES
  - Has submitted Authorizers Assurances to the CDE Office of Blended and Online Learning AND
  - Meets the statutory definition of an online school or program
- An “Online School or Program” **does not** refer to:
  - Vendors of particular software, curriculums, or “online courses” (such as Edgenuity, CDLS, Gradpoint, Schoology, etc.)
  - Online schools or programs operating outside the state of Colorado (such as Florida Virtual Academy)
  - Alternative instruction courses offered by brick-and-mortar schools under the new Board Rules



There are two types of Colorado public Online Schools and Programs:

<u>Multi-District</u> Online (MDOL) School	<u>Single-District</u> Online (SDOL) School or Program
Must be certified by CDE (which includes having current Authorizer's Assurances and corresponding policies on file with the Office of Blended and Online Learning)	Must have current Authorizer's Assurances and corresponding policies on file with the Office of Blended and Online Learning
May accept students from across the state of Colorado	Generally serves students only from the authorizing district
Per pupil funding is different than a brick-and-mortar school	Per pupil funding is the same as a brick-and-mortar school
Reported funding codes in Student October include "92" (full-time) and "95" (part-time).	Reported funding codes in Student October include "91" (full-time) and "94" (part-time).



## Background (continued)

The CDE Office of Online and Blended Learning maintains a complete list of Colorado public Online Schools and Programs:

- [Multi-District and Single District Online Schools](#)
- [Single District Online Programs](#)

For more information, visit the [Office of Online and Blended Learning main webpage](#):  
<https://www.cde.state.co.us/onlinelearning>

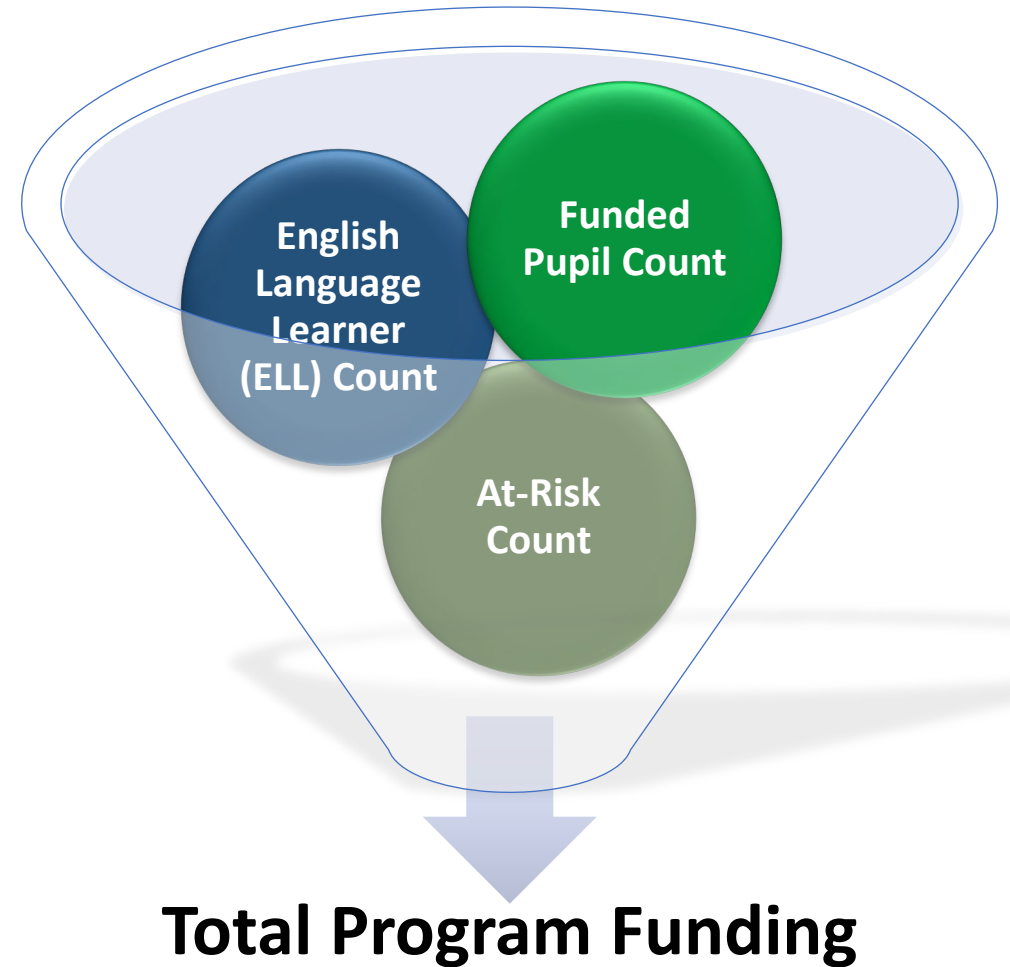


# Counts From Student October Data Collection Determine Total Program Funding

Schools in Colorado are funded by a variety of sources. The biggest source of funding comes from the School Finance Act.

- The data reported by each district and CSI during this data submission is used to determine the total program funding each district and CSI will receive.
- Three counts from the Student October Count Data Collection are used to calculate Total Program Funding

After the data submission is final, all districts and CSI are subject to a compliance audit to ensure accurate reporting of the above noted counts.

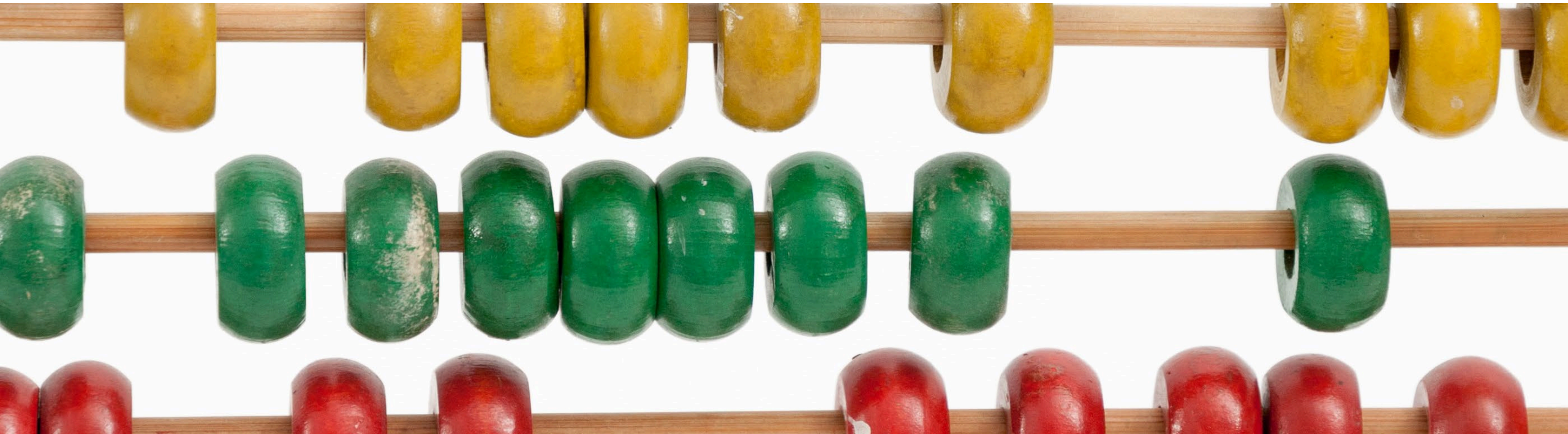




# Student October Count Overview



Because Colorado funds districts based on a one-day pupil membership count (known as the pupil enrollment count date), all data reported in the Student October Count data submission should reflect what was true as of the pupil enrollment count date.





# Student October Count Day 2024



The 2024 pupil enrollment count date will be:

**Tuesday, October 1, 2024**

September							October							November						
Su	Mo	Tu	We	Th	Fr	Sa	Su	Mo	Tu	We	Th	Fr	Sa	Su	Mo	Tu	We	Th	Fr	Sa
1	2	3	4	5	6	7			1	2	3	4	5						1	2
8	9	10	11	12	13	14	6	7	8	9	10	11	12	3	4	5	6	7	8	9
15	16	17	18	19	20	21	13	14	15	16	17	18	19	10	11	12	13	14	15	16
22	23	24	25	26	27	28	20	21	22	23	24	25	26	17	18	19	20	21	22	23
29	30						27	28	29	30	31			24	25	26	27	28	29	30

- The 11-day count period includes the following (based on the district's adopted calendar):
  - The 5 student contact days before the pupil enrollment count date
  - The pupil enrollment count date
  - The 5 student contact days following the pupil enrollment count date
- Districts can request an alternative count date or 11-day count period on behalf of an individual school, if applicable

# General Funding Requirements

# Enrollment and Attendance Requirements

All students (regardless of the type of school or program into which they are enrolled) who are submitted for funding must:

1. Be **enrolled** with the district as of the pupil enrollment count date, unless they qualify as a transfer enrollment exception
  - Within-State Transfer Exception
  - Out-of-State Transfer Exception
2. Must be **in attendance** (or participate) on the pupil enrollment count date
  - If the student is absent **for any reason**, the student must:
    - Establish attendance prior to the pupil enrollment count date during the current school year **AND**
    - Resume attendance within 30 calendar days following the pupil enrollment count date

# Scheduled Hours Requirement

3. If a student meets the enrollment and attendance requirements for funding, then the level of funding for which a student is eligible is determined by their individual student schedule as of the pupil enrollment count date:
  - Part-time funding: Student is scheduled to receive a minimum of 90, but less than 360, hours of instructional time in the semester of the pupil enrollment count date
  - Full-time funding: Student is scheduled to receive a minimum of 360 hours of instructional time in the semester of the pupil enrollment count date



# Funding Requirement: Transfer Enrollment Exceptions



Students enrolling after the pupil enrollment count date, but before the end of the 11-day count period, may be eligible for funding if they meet one of the transfer enrollment exceptions:

- Within-District Transfers
- Within-State Transfers
- Out-of-State Transfers

# Funding Requirements: Scheduled Instructional Hours

- Online schools and programs must provide individual student schedules for all students.
  - Should reflect what was true as of the pupil enrollment count date
  - Should encompass the entire semester of the pupil enrollment count date
- For most student/course types, funding level eligibility is based on scheduled instructional time during the semester of the pupil enrollment count date:
  - Part-time funding: 90, but less than 360, hours
  - Full-time funding: 360+ hours
- Alternative Instruction courses for brick-and-mortar students, and Colorado Public Online Schools & Programs, use Instructional Time Equivalencies for each course
- Additional considerations apply to Postsecondary courses

# Calendar and Bell Schedule Calculations

- Calendar and bell schedule calculations should be conducted by districts and schools to determine, for each brick-and-mortar secondary school, the number of courses (or amount of time) necessary for part-time or full-time funding.
- These calendar and bell schedule calculations should then be used by Colorado public online schools and programs as a basis for determining their equivalent instructional time per semester course.

## Resources:

- Appendix A of the [2023 Student October Count Audit Resource Guide](#) provides examples of how to conduct each of these calculations.

# Funding Requirements: Postsecondary Courses



Funding determination for students taking postsecondary courses depends on the number of eligible credits paid entirely by the district:

- **Part-Time Funding = 3-11** semester college credits
- **Full-Time Funding = 12+** semester college credits

A student may also be eligible for full-time funding if their schedule qualifies as:

- Part-time based on high school scheduled instructional time (i.e., 90+ hours) AND
- Part-time based on postsecondary credit hours (i.e., 3+ credit hours)

Qualifying Dropout Recovery programs run by a community college need only 7 credits for full-time funding.



# Online Schools and Programs

## Section of the Student October Count

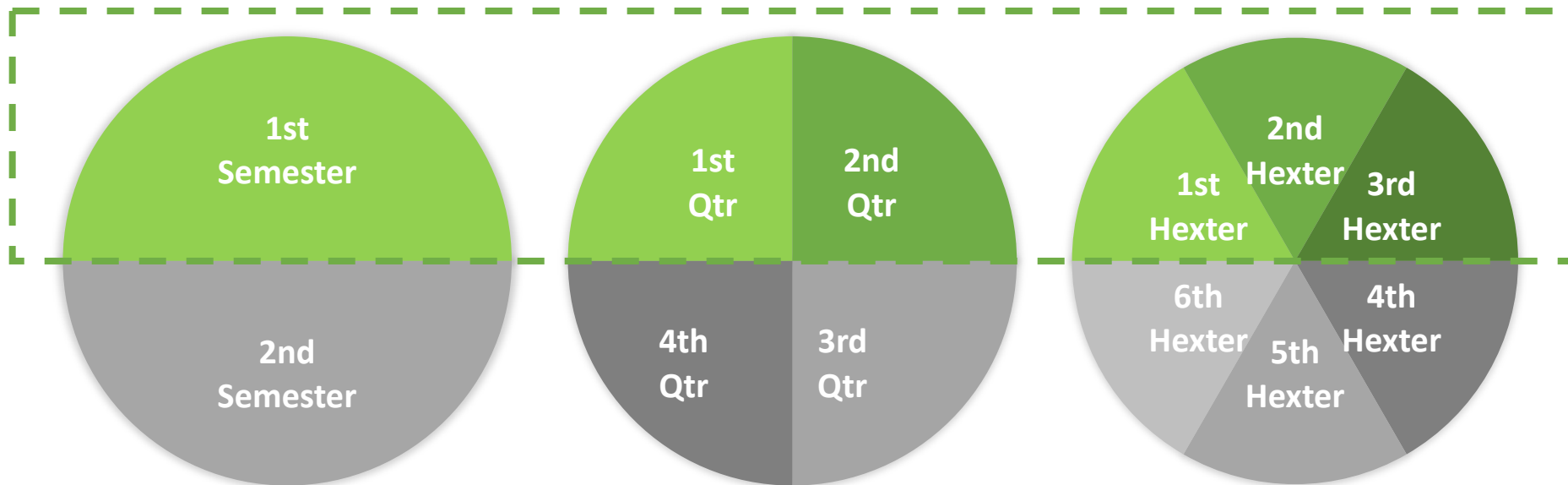
### Audit Resource Guide

# Online Schools and Programs section— Student Schedule Considerations

- Student schedules should clearly state all courses into which the student is scheduled during the semester of the pupil enrollment count date
  - Schedules should reflect what is true as of the pupil enrollment count date (10/1/24)
  - Students should be aware of all courses in which they are expected to participate during the semester of the pupil enrollment count date
  - The school or program should be able to clearly document all schedule changes occurring during the semester of the pupil enrollment count date
- Each student's schedule should be developed to meet the student's individual needs

# Online Schools and Programs section— Student Schedule Considerations (continued)

Funding level is based on the student's entire equivalent fall semester schedule (i.e., semester 1, quarters 1 & 2, or hexters 1, 2, & 3, etc.)



Fall semester is 1/2 the scheduled student contact days according to the school calendar (i.e., total student contact days in the year divided by 2), regardless of how the school organizes terms.

# Online Schools and Programs section— Equivalent Hours Considerations

- Online schools and programs are encouraged to work closely with their Authorizer to determine an appropriate equivalent instructional time per course
- Equivalency is meant to emulate the amount of direct instructional time a student would receive in a traditional classroom setting, if taking the same or similar course
  - **Calendar and bell schedule calculations for the authorizer's traditional schools should be considered for reference**
  - **The equivalence should be within 10% of the total scheduled instructional hours for the same or similar course offered in a traditional classroom setting (as evidenced by credit hours)**
- Courses with varying assigned credits earned may have different equivalencies



# Audit Documentation

# Audit Documentation Requirements (for All Students Regardless of School or Program Type)

- School/Program Level Documentation
  - Calendar
  - Course catalog/student handbook
    - Course descriptions
  - Bell schedule (traditional classroom setting) **OR**
  - Equivalency Statement(s) (online school or program)
- Student-Level Documentation
  - Evidence of enrollment
  - Evidence of participation/attendance
  - Individual student schedule
- Any additional documentation as described in the Audit Resource Guide
  - For example: required audit documentation for transfer enrollment exception students, Concurrent Enrollment courses, work-based learning experience courses, etc.

# Additional Audit Documentation (for Online School and Programs)



- School/Program Level Documentation
  - Authorizer Assurances
- Student-Level Documentation
  - Proof of Residency

- Beginning with the 2022-2023 school year, each online school and program must submit their own Authorizer Assurances
- **New** single-district online schools and programs must submit Authorizer Assurances prior to the start of their first year of operation in order to be evaluated for funding purposes as such.
- **Existing** Colorado public Online Schools and Programs are only required to submit updated Authorizer Assurances when there are any changes.
- The School Auditing Office references the Authorizer Assurances and accompanying attachments during the district's funded pupil count audit.





## Process for Submitting Authorizer Assurances

- Fill out an electronic Smartsheet form and include attachments
- Submit no later than September 20, 2024

The electronic Smartsheet form must include the following attachments:


1. Authorizer Assurance Signature Form
2. Local board policy defining and describing the activities that may be considered participation in the educational process for the purpose of establishing attendance in the Authorizer's online school or program.
3. Sample documentation for each activity that may be used to demonstrate a student has met the attendance requirement for funding (as outlined in local board policy).

**Important:** *At the time of audit, the School Auditing Office will consider only those documents that are described in the Authorizer Assurances and for which samples have been submitted. Failure to include board policy describing which activities may be used to demonstrate participation (with appropriate accompanying sample documentation) may result in audit adjustments.*

# Authorizer Assurance Signature Form

<http://www.cde.state.co.us/onlinelearning/resources>

- This [Authorizer Assurance Signature Form](#) (and accompanying documentation) outlines all the ways in which an online school or program can demonstrate online participation at the student level

**COLORADO**  
Department of Education

Online Schools and Programs  
Authorizer Assurance Signature Form  
Effective May 2022

Pursuant to the Rules of the Administration, Certification and Oversight of Colorado Online Programs (1 CCR 301-71, Rule 8.01.1), Authorizers must adopt policies tracking student enrollment, attendance, and participation (as set forth in Rule 3.02.8). Authorizers may document students' attendance and participation in educational activities in a manner the Authorizer deems appropriate to support student learning. The purpose of this Authorizer Assurance Signature Form is to verify the process and policies by which students' attendance and participation in the online program or online school are tracked and documented.

Students participating in an online program or online school are subject to the compulsory attendance requirements as provided in Article 33 of the Colorado Revised Statutes. Students are deemed to comply with the compulsory attendance requirements through participation in an online program or online school. The Assurances provided below ensure compliance with these statutory requirements, as well as the attendance requirements for funding outlined by the Rules for the Administration of the [Public School Finance Act](#) (1 CCR 301-39).


**Definitions**  
The subsections of 1 CCR 301-71, Rule 2.0 define the types of online schools and programs that an Authorizer may offer:

**Online Programs**  
"Online Program" means a full-time education program authorized pursuant to Title 22 of the Colorado Revised Statutes that delivers a sequential program of synchronous or asynchronous instruction directed by a teacher primarily through online digital learning strategies that provide students choice over time, place, and path, and teacher-guided modality of learning. "Online Program" does not include a supplemental program. Accountability for each student in an online program is attributed back to a designated school that houses the online program. An Online Program with one hundred or more students is an Online School and not an Online Program (Rule 2.09).

- Single District Online Program**  
"Single-District Online Program" means an Online Program that serves only students who reside within a single school district (Rule 2.12)

**Online Schools**  
"Online School" means a full-time, education school authorized pursuant to Title 22 of the Colorado Revised Statutes that delivers a sequential program of synchronous or asynchronous instruction directed by a teacher primarily through online digital learning strategies that provide students choice over time, place, and path, and teacher-guided modality of learning. An Online School has an assigned school code and operates with its own administrator, a separate budget, and a complete instructional program. An Online School is responsible for fulfilling all reporting requirements and is held to state and federally mandated accountability processes (Rule 2.10).

- Multi-District Online School**  
"Multi-District Online School" means an Online School that serves a student population drawn from two or more school districts (Rule 2.07).



**Attendance**  
Each online program and online school must document a student's compliance with compulsory attendance requirements during the official count window (1 CCR 301-71, Rule 8.01).

To meet the attendance requirement for funding purposes, students must participate in the educational process (as defined by the local board of education) on the pupil enrollment count date, or, if they do not participate (for any reason) then, the student must participate prior to the pupil enrollment count date during the current school year and within 30 days following the count date. The activities that constitute attendance and participation in the educational process should be defined in and described by local board policy, in a manner the Authorizer deems appropriate to support student learning.

These activities may include, but are not limited to:

- assessment, orientation, and induction [activities](#);
- in-person educational instruction; and
- synchronous and asynchronous internet-based educational activities.

While the activities that constitute attendance and participation in the educational process should be defined in and described by local board policy, the Authorizer may define the documentation demonstrating that a student has participated in one of these board-approved activities. At the time the Authorizer Assurances are submitted, the district or school must also provide samples of documentation that will be used to demonstrate students have met the attendance requirement to CDE's Office of Blended and Online Learning. At the time of the funding audit, the School Auditing Office will only consider this same documentation when determining whether a student has met the attendance and participation requirement.


**Authorizer's Assurances**  
The following information must be completed separately for each online school or program operated by the Authorizer:

For each online school or program operated by the Authorizer, a copy of this form must be signed and dated by the Chief Financial Officer and Superintendent to certify that the required Authorizer assurances and documentation (including local school board-approved policies and sample attendance documentation) have been provided to CDE's Office of Blended and Online Learning.

**Assurances**

☐ The Authorizer has reviewed the attendance requirement described above, and has provided to the Office of Blended and Online Learning the local board policy defining and describing the activities that may be considered participation in the educational process for the purpose of establishing attendance in the Authorizer's online school or program.

☐ The Authorizer has attached sample documentation for each activity that may be used to demonstrate a student has met the attendance requirement for funding (as outlined in local board policy).



☐ At the time of audit, the Authorizer will provide documents of the same type as the samples that were provided to demonstrate the attendance requirement has been met for each student enrolled in an online school or program and submitted for funding. No other documentation type will be considered when evaluating the attendance requirement for funding purposes.

**Authorizer Information**

District Code: \_\_\_\_\_

District Name: \_\_\_\_\_

CDE School Code (if applicable): \_\_\_\_\_

Online School or Program Name: \_\_\_\_\_

Please select one option below for the school or program noted above:

☐ Multi-district online school

☐ Single-district online school

☐ Single-district online program

Chief Financial Officer (signature) \_\_\_\_\_ (printed name) \_\_\_\_\_  
Date \_\_\_\_\_

Superintendent (signature) \_\_\_\_\_ (printed name) \_\_\_\_\_  
Date \_\_\_\_\_

No later than September 20, submit electronically through the Smartsheet submission link found at: <https://www.cde.state.co.us/onlinelearning/resources>

**NOTE:** Once an Authorizer has provided these assurances and supporting documentation, the Colorado Department of Education will assume the Authorizer plans to continue to use the policies identified in their assurance form. Annual submission is not required. However, resubmission to the Office of Blended and Online Learning no later than September 20 of the applicable school year is required if the Authorizer has changed their local board policy with regard to attendance and/or the documentation used to demonstrate participation in the educational process.



Authorizer Assurances Signature Forms and the accompanying documents are submitted/uploaded through the corresponding online submission forms:

- [Multi-district Online School Authorizer Assurances Submission](#) online form
- [Single District Online School or Program Authorizer Assurances Submission](#) online form

Information regarding authorizer assurances can be found on the [Online and Blended Learning Resources](#) webpage  
(<https://www.cde.state.co.us/onlinelearning/resources>).

# Authorizer Assurances Documentation

The documentation that may be submitted to demonstrate participation in a board approved educational activity may differ depending on the type of activity.

Examples might include:

Educational Activity	Documentation of Attendance/Participation
Assessments	Assessment system report including student name, date of assessment, and scores
Orientation	Student sign-in sheets
In-person Instruction	Student sign-in sheets; Student Information System reports with affirmative in-person attendance code
Synchronous internet-based educational activities	Student sign-in sheets; Student Information System reports with affirmative synchronous attendance code
Asynchronous internet-based educational activities	Learning management system log-in reports showing access and completion of course-specific activities



# Further Additional Audit Documentation (for Online School and Programs)

## Proof of Colorado Residency

- Pursuant to 1 CCR 301-71-8.06, an online school or program must verify and document a student's residency in the state of Colorado upon initial enrollment and annually thereafter, and retain a copy of the document or written statement in the student's mandatory permanent record
- Colorado residency is determined by the student and parent/legal guardian currently residing within the state of Colorado boundaries, except for students of military families
- More information is available on the [Online and Blended Learning Resources](http://www.cde.state.co.us/onlinelearning/resources) site  
(<http://www.cde.state.co.us/onlinelearning/resources>)







- Review the posted “[Online Signature Guidance](#)” specific to the following documents:
  - **Affidavit of Residency** (for students enrolled in a Colorado public Online School or Program)
  - **Family Economic Data Survey (FEDS) form**
  - [https://www.cde.state.co.us/cdefinance/school\\_auditing\\_online\\_signatures](https://www.cde.state.co.us/cdefinance/school_auditing_online_signatures)
- Contact the [School Auditing Office](#) at [audit@cde.state.co.us](mailto:audit@cde.state.co.us) with any questions.

# Updates to the Rules for the Administration of the Public School Finance Act of 1994

# Notice of Rule Making... Adoption of updated Rules

- In March 2024, the State Board of Education approved [changes](#) to the Rules for the Administration of the Public School Finance Act of 1994 (1 CCR 301-39).
- These rules apply to all schools within districts (with the exception of Section 2.05 which does not apply to online schools and programs which are governed by 22-30.7-105(2)(a) and 1 CCR 301-71, Rule 8).
  - Section 2.05 outlines Instructional Time for Purposes of the School Finance Act and makes the distinction between direct teacher-pupil instruction and alternative teacher-pupil instruction for pupils.
  - References to alternative instruction within these rules do NOT apply to Colorado public online schools and program.



# Instruction Types for Brick-and-Mortar Schools In the Updated Board Rules



## “Direct teacher-pupil instruction”

[T]he organized delivery of educational content (aligned to state standards where applicable) for pupils enrolled in brick-and-mortar public schools under the supervision of a licensed educator that **takes place synchronously**, when the licensed educator and the pupil are in the **same physical location or** when the licensed educator and the pupil are in the **same virtual classroom**.

Direct instruction also includes engagement with educational content in courses, such as **study hall or advisory or credit recovery lab or independent study**, that are **on-site at a scheduled time during regular school hours and for a set amount of time and where attendance is mandatory**.

## “Alternative teacher-pupil instruction”

[T]he organized delivery of educational content (aligned to state standards where applicable) for pupils enrolled in a brick-and-mortar public school under the supervision of a licensed educator that **may take place asynchronously**.



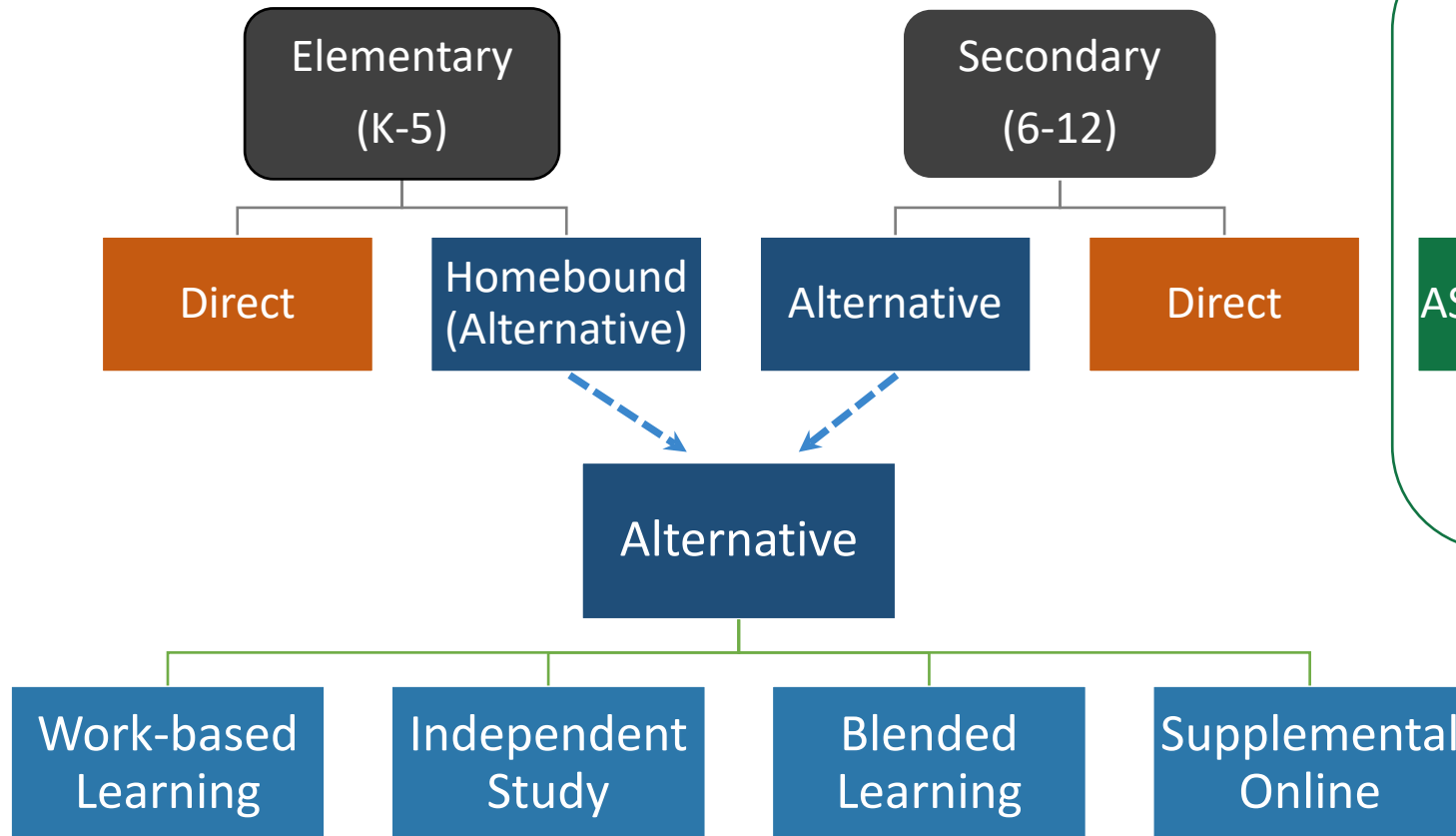
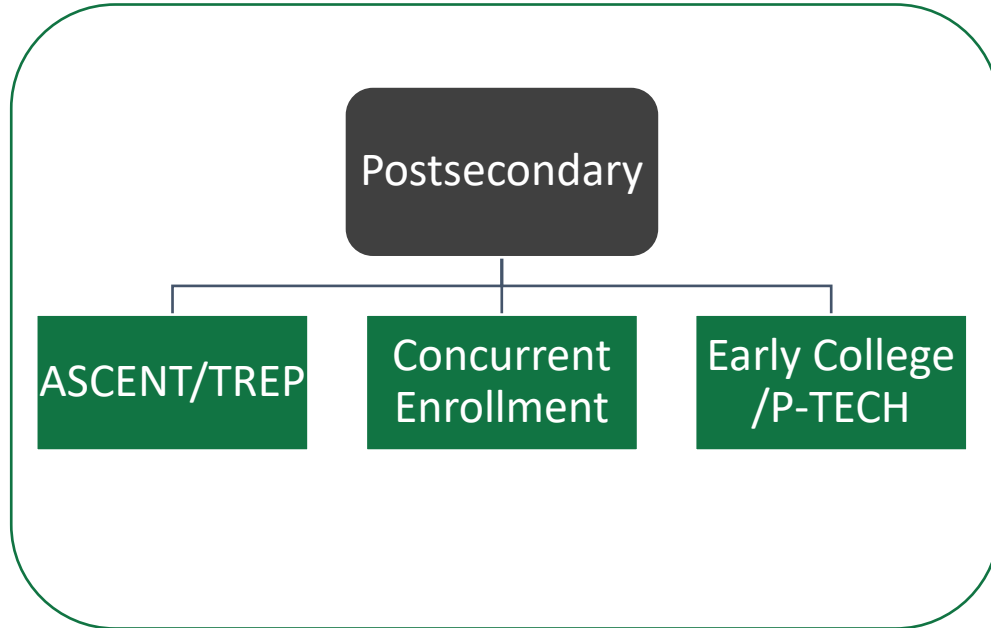
## Brick-and-Mortar Instructional Time Under New Board Rules: The “Big Picture”

Elementary (K-5)	Secondary (6-12)	Online Schools and Programs
<ul style="list-style-type: none"><li>• <b>Direct Instruction</b></li></ul>	<ul style="list-style-type: none"><li>• <b>Direct Instruction</b></li><li>• <b>Alternative Instruction (New)</b></li></ul>	<ul style="list-style-type: none"><li>• Generally not covered by these Instructional Time rules</li></ul>





# Instructional Types of Courses In the Updated Rules for Brick-and-Mortar Schools



# Brick-and-Mortar Alternative Instruction Courses vs.

## Online Courses offered to Students attending Colorado Public Online Schools and Programs

# New Student October Count Snapshot Data



- Beginning in 2024/2025, there are four new data fields that will be included in the Student Interchange- Student School Association file:
  - Independent Study Course
  - Work-Based Learning Opportunity Course
  - Blended Learning Course
  - Supplemental Online Course
- For each of these fields, districts will need to indicate whether a given student is scheduled into any of these alternative instruction courses during the Fall semester.
- For students enrolled in SDOL or MDOL schools, or identified as being in an SDOL program, none of these fields should be flagged “Yes” (i.e., value of ‘1’). Alternative instruction course types do NOT apply to Colorado public online schools and programs.

# Coding Patterns within Student October



	Brick-and-Mortar Students in Alternative Education Courses	SDOL <u>Program</u> Students	SDOL <u>School</u> Students	MDOL School Students
Funding Code	80, 82, 85	91, 94	91, 94	92, 95
Non-School Program Code	<> 01	01	<> 01	<> 01
Blended Learning Course Code	'0'- No <u>or</u> '1'- Yes	'0'- No	'0'- No	'0'- No
Supplemental Online Course Code	'0'- No <u>or</u> '1'- Yes	'0'- No	'0'- No	'0'- No
Work-based learning course code	'0'- No <u>or</u> '1'- Yes	'0'- No	'0'- No	'0'- No
Independent Study course code	'0'- No <u>or</u> '1'- Yes	'0'- No	'0'- No	'0'- No

# Course Type Restrictions



<u>Brick and Mortar</u> Students	<u>Online</u> Students
Any of the 4 types of alternative instruction courses are allowed.	Alternative instruction course designation does not apply to online students. All courses offered to online students by the SDOL/MDOL schools or programs into which they are enrolled are evaluated the same.
Proof of residency is required only for students who are not scheduled into courses that require them to be on site at a district school at specific days and times.	Proof of residency is required for <u>all</u> online students.
A student reported at a brick-and-mortar school may supplement their schedule with blended learning and supplemental online courses offered by an MDOL or SDOL school (or program); however, <u>brick-and-mortar</u> students cannot be exclusively enrolled in K-12 online courses.	A student enrolled in an online school or program may supplement their schedule with courses offered by a brick-and-mortar school.



- If a Colorado public online school or program is providing supplemental online or blended learning courses to students primarily enrolled in brick-and-mortar schools, these courses are considered ‘alternative instruction courses’ for the brick-and-mortar student and will be evaluated as such.
- **New:** Equivalent instructional time associated with these courses for the brick-and-mortar student will be determined by the amount of instructional time the student would have received had they taken a similar credit-bearing course at their brick-and-mortar school; their equivalency will not be based on the equivalency statement determined by the Colorado public online school or program.

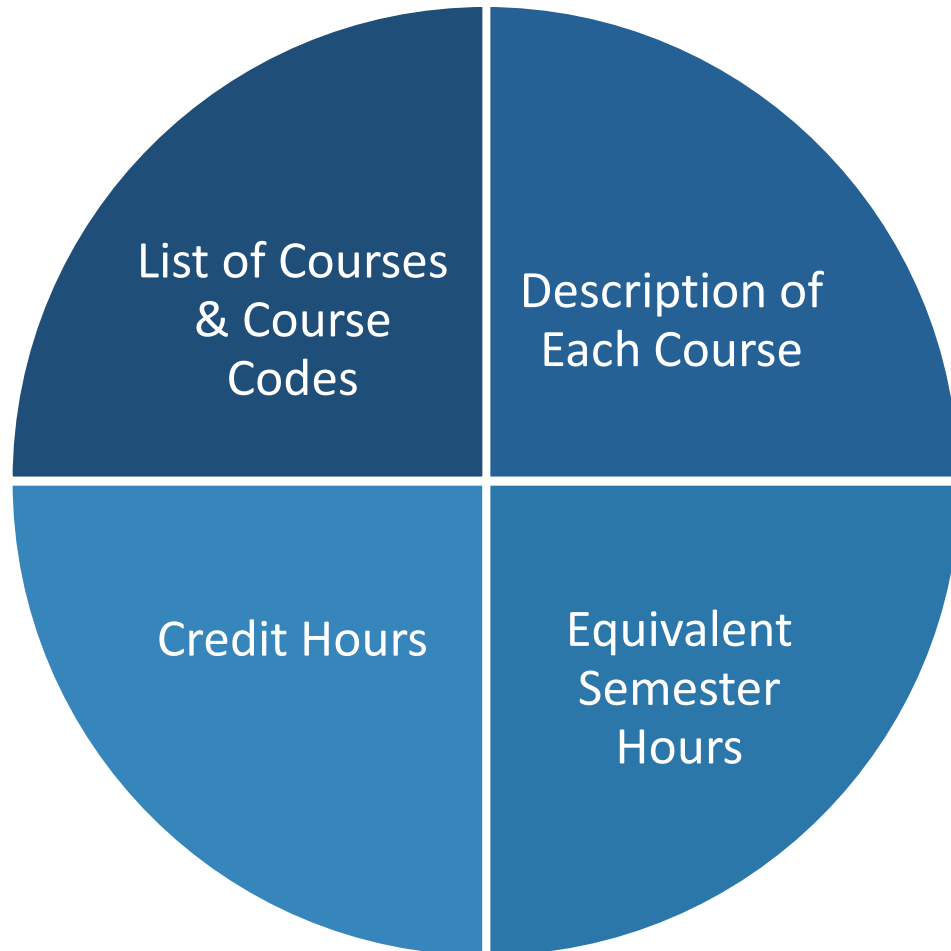
# Instructional Time Equivalency (continued)



Brick-and-Mortar <u>Students</u>	Online School or Program <u>Students</u>
<p>Alternative Course Equivalency is:</p> <ul style="list-style-type: none"><li>• the actual semester hours of direct instruction</li><li>• for the same or similar course</li><li>• that earns the same amount of credit</li><li>• at the school where the student is reported</li></ul>	<p>Online Course Equivalency is:</p> <ul style="list-style-type: none"><li>• reasonably aligned with the actual semester hours of instruction (within 10%)</li><li>• for the same or similar course</li><li>• that earns the same amount of credit</li><li>• at a school in the authorizing district or BOCES</li></ul>
<p>Passing periods are not included as instructional time for alternative instruction courses</p>	<p>“Passing periods” may be included in the equivalency for online courses, if appropriate and the total amount of time is within the 10% range stated above.</p>



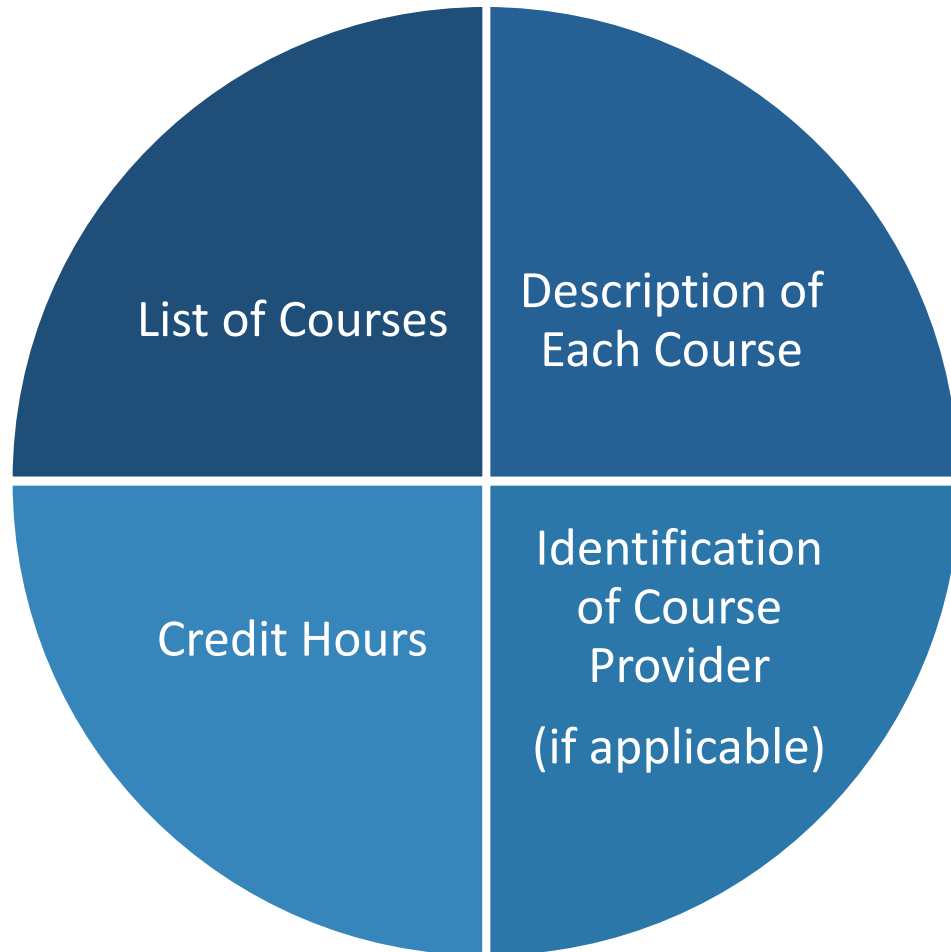
# Online School or Program Course Catalog



- As described in the Guide since 2020/2021, to include online courses the determination for funding, an online school or program must have documentation of these 4 requirements
- If a singular document (such as a course catalog, vendor course guidebook, student handbook, etc.) does not contain all of the required course information, supplemental documents which contain the missing information may be provided.



# Alternative Teacher-Pupil Instruction Course Catalog



- To include courses utilizing alternative teacher-pupil instruction in the determination for funding, the district (or school) must have a course catalog that includes the 4 requirements
- This catalog must be posted on the School/district/BOCES website by the applicable count date
- The course provider is the vendor from whom the district purchases the course content, or if the district developed the course “in-house”, identify the school responsible for development

# Brick-and-Mortar Schools Offering Supplemental Online Courses from Online Schools and Programs

If a district is using an MDOL or SDOL (school or program) to provide supplemental online courses to its brick-and-mortar students:

- It may link to the online school or program course catalog from its 'catalog of courses using alternative instruction'. However, in this instance the district must ensure that all required information for the alternative courses is included within its 'catalog of courses using alternative instruction'.
- For funding purposes, **logins into course content** are the only way a brick-and-mortar student can evidence attendance for supplemental online courses; documentation outlined in the MDOL or SDOL school's or program's authorizer assurance do not apply to brick-and-mortar students taking alternative instruction courses through these schools or programs.



# Additional Known Updates Relevant for Online Schools and Programs

# Additional Known Updates Relevant for Online Schools and Programs (Transfer Students)

- Out-of-State Transfer Enrollment Exceptions (1 CCR 301-39 (5.04)(1))
  - If a student moves to Colorado (from another state or country) within 30 days prior to the applicable count date and enrolls in a district after the applicable count date, but before the end of the 11-day count period, the student may be eligible for funding if:
    - The student establishes enrollment and attendance at the receiving district prior to the end of the 11-day count period, AND
    - The student has a schedule at the receiving district prior to the end of the 11-day count period.

# Additional Known Updates Relevant for Online Schools and Programs (Part-time Students)

- Part-time students (1 CCR 301-39 (5.06)(1))
  - For part-time students in grades 1-12 who do not meet one of the following criteria, the district must be prepared to provide a statement describing the reasons the student is enrolled part-time AND confirms how the student is compliant with the Compulsory school attendance requirements:
    - Receiving services under an IEP
    - Identified by the Department as being in their fifth year of high school or beyond
    - Identified as participating in a high-school equivalency diploma program
    - Identified as a home-based education student receiving educational services by the district

# Additional Known Updates Relevant for Online Schools and Programs (Calendar Calculations)

- For calendar calculation purposes, the length of the semester will be determined by dividing the total number of scheduled student contact days in the school year (as evidenced by the district/school calendar) by 2.
- This is true regardless of whether a school follows a semester, trimester, quarter, “hexter,” or mini-session calendar.

# Additional Known Updates Relevant for Online Schools and Programs

- For students enrolled in **ASCENT**, districts must be prepared to provide a college transcript demonstrating the student has completed the minimum college coursework (i.e., at least 9 semester credits) prior to the student's ASCENT year.



# Additional Known Updates Relevant for Online Schools and Programs (Annual Assurances)

- Beginning in 2024/2025, if a district or school contracts with another entity to provide educational services, it will need to complete the “**Annual Assurances for Statutory Compliance for Contracted Services.**” ((1 CCR 301-39 (5.11)(1))
  - These assurances will need to be completed for each contracted entity.
- A copy of these assurances will be available on the [Pupil Count](https://www.cde.state.co.us/cdefinance/auditunit_pupilcount) webpage ([https://www.cde.state.co.us/cdefinance/auditunit\\_pupilcount](https://www.cde.state.co.us/cdefinance/auditunit_pupilcount)) on or before July 1, 2024.

# At-Risk Count

# Free and Reduced-Price Lunch Eligibility

- For 2024/2025, the at-risk count includes both free *and* reduced-price lunch eligible students.
- Districts will be expected to retain documentation supporting lunch eligibility status for any student reported as free or reduced-price lunch eligible in Student October.
- 2024 At-Risk Audit Resource Guide will be posted on the [At-Risk Count page](https://www.cde.state.co.us/cdefinance/auditunit_atrisk_freeandreduced) by 7/1/24
  - ([https://www.cde.state.co.us/cdefinance/auditunit\\_atrisk\\_freeandreduced](https://www.cde.state.co.us/cdefinance/auditunit_atrisk_freeandreduced))
- [Training and Office Hours](https://www.cde.state.co.us/cdefinance/auditunit_trainings) webpage
  - ([https://www.cde.state.co.us/cdefinance/auditunit\\_trainings](https://www.cde.state.co.us/cdefinance/auditunit_trainings))
- At-Risk Count Audit Overview Webinars
  - **At-Risk Funding & CEP for Business Officials** May 21, 2024 (10AM)
  - **At-Risk Count Audit Overview** August 8, 2024 (1PM)

# Eligibility Documentation

Application  
or FEDS

- Student determined to be free, reduced-price, or paid lunch eligible based on household size and income or assistance program information

Direct  
Certification

- Student determined to be free (or reduced-priced) lunch eligible based on participation in an approved assistance program

Categorical  
Eligibility

- Student determined to be free lunch eligible based on the individual student's foster, migrant, homeless, or runaway status

## Notice: Changes to At-risk Funding Calculations Beginning in 2025-2026

- HB22-1202 created a new at-risk measure in the public school finance funding formula.
- Pursuant to SB24-188, this new measure will be implemented starting with the **2025-2026** school year.
- The new measure will take into consideration:
  - Percentage of students certified as eligible for free lunch based on receipt of SNAP, TANF, FDPIR benefits or participating in Medicaid (i.e., directly certified) OR based on categorical eligibility (foster, homeless, migrant, etc.); AND
  - A neighborhood socioeconomic status index that is linked to each student's census block group.
- Although implementation is delayed, beginning with **2024-2025**, districts will be required to submit all necessary data fields for future implementation.



# Free Lunch Eligibility Identification

- “Free Lunch Eligibility Identification” field
  - Any student reported with a “Free/Reduced Lunch Price Eligible” value of “**01**” (**free** lunch eligible) must have a value other than “0” in this field
- Applicable values are:

Value	Free Lunch Eligibility Identification Field Description
0	Not identified as Free Lunch Eligible
1	Direct Certification (Medicaid, SNAP, TANF, FDPIR) – including extension to other household members
2	Other Source Categorical (Migrant, Homeless, Runway, Foster, Head Start documented participation) – LEA lists, student-specific eligibility
3	Application (Application for Free and Reduced-Price Meals, Family Economic Data Survey Form, or Combination form)

- Beginning in 2024/2025, there will be a new Data Pipeline interchange file (“At-Risk”) which will collect all students’ census block data necessary to determine neighborhood socioeconomic status index
  - State, County, Track, and Block codes
- CDE is developing guidance and instructions on how to obtain and report this data. Refer to the [Data Pipeline Interchanges – At-Risk](https://www.cde.state.co.us/datapipeline/inter_atrisk) webpage
  - ([https://www.cde.state.co.us/datapipeline/inter\\_atrisk](https://www.cde.state.co.us/datapipeline/inter_atrisk))
- Upcoming At-Risk Measure Webinars
  - **Introduction to Census Block Geocode Tool**
    - June 11, 2024 (1PM) & August 13, 2024 (10AM)
  - **Overview of the Data Pipeline At-Risk Interchange File**
    - August 20 2024 (1PM)

# ELL (English Language Learner) Count

**Beginning with fiscal year 2021-2022, the English Language Learner funding factor is included in the calculated total program funding for each district.**

This funding factor includes additional funding to districts related to the total number of English learners included in the district's funded pupil count for the current year.





Please note that the English Language Learner count/funding factor is separate from the categorical funding districts received under the English Language Proficiency Act (ELPA).

More information is available on [the ELPA site](http://www.cde.state.co.us/cde_english/elpa)  
([http://www.cde.state.co.us/cde\\_english/elpa](http://www.cde.state.co.us/cde_english/elpa))



# Resources and Training

## English Language Learner Count

SCHOOL AUDITING OFFICE

### English Language Learner Count



2023 Count Date: Monday, October 2

#### Summary

Each year all public school districts across the state of Colorado participate in the Student October Count data submission to the Colorado Department of Education (CDE). The purpose of this data collection is to obtain required student-level data as provided for by state statute, including information regarding students' funding eligibility as outlined in the Public School Finance Act of 1994 (Section 22-54-101, C.R.S.). The Colorado Department of Education collects these data through the Data Pipeline with the Information Management Services (IMS) unit of CDE overseeing the collection.

As provided for under SB21-268 and beginning with fiscal year 2021-2022, there is a new English Language Learner funding factor that is included in the calculated total program funding for each district. This new funding factor includes additional funding to districts related to the total number of English language learners included in the district's funded pupil count for the current year.

Student October Count data is used to determine which students are included in the district's English language learner count. Students meeting the following criteria are included in the district's ELL count:

- Grade level: Kindergarten through 12<sup>th</sup> grade
- Public School Finance Funding Status (i.e., funding code): 80, 82, 85, 91, 92, 94, 95
- Language Proficiency: 1 NEP (Non-English Proficient); 2 LEP (Limited-English Proficient)

In addition to the above listed criteria, students must still be within the five-year services window defined in English Language Proficiency Act (ELPA). Please note that the English Language Learner count/funding factor is separate from the categorical funding districts received under the English Language Proficiency Act (ELPA). For more information about ELPA, please visit: [http://www.cde.state.co.us/cde\\_english/elpa](http://www.cde.state.co.us/cde_english/elpa).

In an effort to ensure accurate reporting of those data fields associated with the determination of each district's total program funding, the School Auditing Office will conduct periodic compliance audits of each district's Student October count data, including a review of documentation to support the district's English Language Learner count, specifically the district's determination of language proficiency for students reported as Non-English Proficient (NEP) and Limited-English Proficient (LEP).

Some forms recommended by the School Auditing Office may contain personally identifiable information of students and districts should take additional precautions. Local education agencies must use secure means when sending Personally Identifiable Information (PII) to CDE. If transferring PII between districts, schools, or with other parties, CDE strongly recommends that districts use a secure method of transferring PII between districts, schools, or with other parties (for example, a secure file sharing tool like Syncplify, or including the PII in a password-protected document). For more information, please visit the [Data Privacy and Security](#) website or contact [CDE's Data Privacy Office](#).

#### Resource Guide

2023-2024 English Language Learner Count Audit Resource Guide (UPDATED 07/07/23)

- [English Language Learner Count](http://www.cde.state.co.us/cdefinance/auditunit_ell_count) webpage:
  - ([http://www.cde.state.co.us/cdefinance/auditunit\\_ell\\_count](http://www.cde.state.co.us/cdefinance/auditunit_ell_count))
- [ELL Count Overview Training](http://www.cde.state.co.us/cdefinance/auditunit_trainings):
  - September 17, 2024 (10AM)
  - ([http://www.cde.state.co.us/cdefinance/auditunit\\_trainings](http://www.cde.state.co.us/cdefinance/auditunit_trainings))

# Resources

## [School Auditing Office's Website](http://www.cde.state.co.us/cdefinance/auditunit)

<http://www.cde.state.co.us/cdefinance/auditunit>

The screenshot shows the School Auditing Office website. A red arrow points to the 'School Auditing Office' link in the top navigation bar. A red box highlights the 'At-Risk Count', 'English Language Learner Count', 'Pupil Count', 'Transportation', 'Training and Office Hours', and 'Contact Us' links in the right sidebar. The main content area features a large green banner with the text 'School Auditing Office' and a photo of a child playing with colorful counting sticks. Below the banner is an 'About Us' section with a paragraph describing the office's role and a video player titled 'Preparing for Audit'. To the right of the video is a 'Resources' section with links to 'School Auditing Office Audit Process (PDF)', 'Audit District Contact Form (DOC)', and 'Syncplicity Instructions (PDF) (View training recording)'. At the bottom right is a 'Learn More' section with a link to 'Financial information on schools and districts throughout Colorado. Learn more about financial transparency.' and a 'Financial Transparency' logo.

Home

School Auditing Office Overview

# School Auditing Office

**About Us**

This office performs compliance audits as required by the Public School Finance and Public School Transportation rules and law. The office provides technical guidance and support throughout the pupil count and transportation data submissions to assist districts prior to finalizing submissions. The School Auditing Office is part of the School Finance Unit within the School Finance and Operations Division.

**Resources**

- [School Auditing Office Audit Process \(PDF\)](#)
- [Audit District Contact Form \(DOC\)](#)
- [Syncplicity Instructions \(PDF\)](#) ([View training recording](#))

**Learn More**

Financial information on schools and districts throughout Colorado. [Learn more about financial transparency.](#)

**Financial Transparency**

School Finance Division Home

**School Auditing Office**

- At-Risk Count
- English Language Learner Count
- Pupil Count
- Transportation
- Training and Office Hours
- Contact Us

Capital Construction

Grants Fiscal

School Nutrition (OSN)

School Transportation

About Us


Contact Us

## Pupil Count Webpage

[https://www.cde.state.co.us/cdefinance/auditunit\\_pupildcount](https://www.cde.state.co.us/cdefinance/auditunit_pupildcount)

SCHOOL AUDITING OFFICE

Pupil Count




**2023 Count Date: Monday, October 2**

**Summary**

Each year all public school districts and facilities across the state of Colorado participate in the Student October Count data submission to the Colorado Department of Education (CDE). The purpose of this data collection is to obtain required student level data as provided for by state statute, including information regarding students' funding eligibility as outlined in the Public School Finance Act of 1994, as amended (22-54-101, C.R.S.). The Colorado Department of Education collects these data through the Data Pipeline system with the Information Management Services (IMS) unit of CDE overseeing the collection.

The Student October Count is based on a one (1) day membership count in which districts are asked to report all students who are actively enrolled and attending classes through their district on that date. While the submission should only include those students who meet the membership and scheduling requirements as of the pupil enrollment count day, the actual submission process begins in September and closes mid-November. Districts should refer to the Student October Count data submission documentation distributed by the IMS unit at CDE for further information regarding the actual submission process and data element definitions.

**Upcoming Student October Count Webinars**

**Resource Guides**

**2023-2024 Student October Count Audit Resource Guide**  
UPDATED 06/30/23

On Thursday, March 14, 2024 the State Board of Education approved changes to the Rules for the Administration of the Public School Finance Act of 1994 (1 CCR 301-39). A copy of these update rules can be found on the [School Finance](#) website.

**2024-2025 DRAFT Student October Count Audit Resource Guide (PDF)**  
The intent of this document is to provide districts, schools and BOCES the opportunity to provide feedback ahead of the release of the final "official" 2024 Student October Count Audit Resource Guide.

**Duplicate Count**

- **2023-24 Duplicate Count Training and Scenario Webinar (PPT) (Recording)**
- [Duplicate Count Process Overview on Vimeo \(00:15:09\)](#)
- [Duplicate Count Documentation Quick Reference \(PDF\)](#)
- [Audit Resource Guide Duplicate Count Appendix \(PDF\)](#)
- [Syncplicity Instructions \(PDF\) \(View training recording\)](#)

**Timeline**

[Click here to view the School Auditing Office's calendar of important dates and deadlines \(link\)](#)

**Trainings**

[Click here to view the School Auditing Office's upcoming trainings and recorded webinar trainings \(link\)](#)

## IMPORTANT REMINDER

- All Colorado Public Online Schools and Programs, and their authorizing districts/BOCES, are responsible for reviewing all Guidance as posted in the corresponding Audit Resource Guides.
- All 'final' 2024 Audit Resource Guides will be posted on or before July 1, 2024 to their corresponding webpages.
- Updated guidance may include additional clarification and requirements not covered during this webinar



# Student October Count Resources

- Funded Pupil Count
  - [Pupil Count](#) webpage
  - [2023 Student October Count Audit Resource Guide](#)
- At-Risk Count
  - [At-Risk Count](#) webpage
  - [2023 At-Risk Count Audit Resource Guide](#)
- English Language Learner (ELL) Count
  - [English Language Learner Count](#) webpage
  - [2023 English Language Learner Audit Resource Guide](#)

*Note: 2024 Audit Resource Guides will be posted on or before July 1, 2024*

## School Auditing Office

- Email: [audit@cde.state.co.us](mailto:audit@cde.state.co.us)
- Website: <http://www.cde.state.co.us/cdefinance/auditunit>

Rebecca McRee, Audit Supervisor

- Email: [mcree\\_r@cde.state.co.us](mailto:mcree_r@cde.state.co.us)

# Questions?