

2022 Student October Count: Introduction to Funding and Audit Documentation Requirements for Alternative Education Campuses (AEC)

School Auditing Office

Purpose

The goals of today's webinar are to:

- Provide a high-level overview of the funding and audit documentation requirements related to the Student October Count data submission/Funded Pupil Count
- Introduce participants to available resources and information as they prepare for the 2022 Student October Count data submission and subsequent audit
- Review information that may be especially relevant to schools with the Alternative Education Campus AEC designation
- Brief update of At-Risk and English Language Learner funding counts





Introduction





Funding in the State of Colorado

- The Public School Finance Act of 1994 and the accompanying rules describe the funding formula and the requirements for pupils to be included in a district's funded pupil count
- Funding under this act includes general per pupil funding calculation for each student at the district, plus funding for:
 - At-Risk pupils
 - English learner pupils
 - Multi-district online pupils
 - ASCENT, P-TECH, and TREP pupils



The School Finance Unit at CDE is responsible for calculating the total pupil and at-risk funding (known as "Total Program" funding) based on district-reported data included in the Student October Count data submission.

The School Auditing Office is responsible for:

- Conducting compliance audits as required by the Public School Finance Act of 1994 and the accompanying rules
 - These audit verify that the funding data fields reported during the data submission were accurate when determining funding eligibility
- Providing technical guidance and support to districts throughout the Student October Count data submission related to funding eligibility requirements and corresponding audit documentation



Student October Count Day 2022

The 2022 pupil enrollment count date will be:

Monday, October 3, 2022

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

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

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

- The 11-day count period includes the following (based on the <u>district's</u> 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



Student October Count Data Submission

- When reporting data in the Student October Count data submission, it is very important that districts and schools have processes in place to ensure accurate reporting of all data fields, especially those used for determining funding
- Under- or over-reporting of the funded pupil and/or at-risk and ELL counts may result in:
 - <u>Significant</u> audit findings for the district
 - (i.e., the district owing money back to CDE or not receiving all eligible funds prior to audit)
 - This may impact both the current and subsequent school years.
 - Impact on funding for districts across the state of Colorado





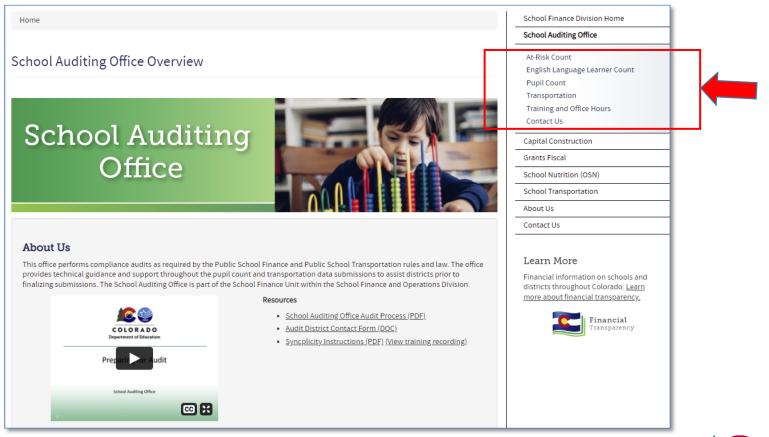
Resources





Resources: School Auditing Office's Website

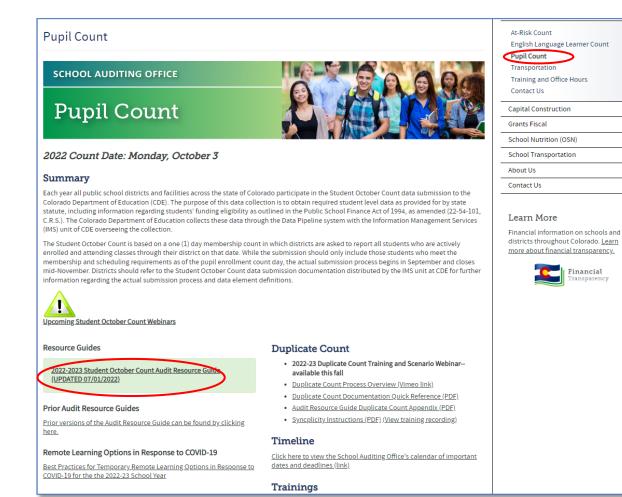
http://www.cde.state.co.us/cdefinance/auditunit





Resources: Pupil Count Webpage

https://www.cde.state.co.us/cdefinance/auditunit_pupilcount





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Resources: Student October Count Audit Resource Guide

- Describes the general funding requirements and corresponding audit documentation for every student
 - Districts & schools are encouraged to be most familiar with the first 17 pages of the guide (general funding requirements and corresponding audit documentation)
 - Review Appendices A (Calendar and Bell Schedule Calculations) and C (Duplicate Count).
- Identifies various "unique" student types, courses, schools, and programs that are:
 - Exceptions to the general funding rule(s), and/or
 - Variations in the type of audit documentation necessary to evidence funding eligibility
- Link to Audit Resource Guide:

https://www.cde.state.co.us/cdefinance/2022 student october audit resource guide



Student October Count Audit Resource Guide: Cover Page and Table of Contents



COLORADO Department of Education

2022 Student October Count Audit Resource Guide Fiscal Year 2022-2023

For use during the Student October Count data submission and subsequent audit

Submitted to:

Colorado Public School Districts, Charter Schools, Charter School Collaboratives, Charter School Networks, The Charter School Institute (CSI) and Colorado Boards of Cooperative Educational Services (BOCES)

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Effective July 1, 2022

This Guide is to be read as a whole, in context, and CDE gives effect to every word of the document. In auditing, CDE is bound to give consistent, harmonious, and sensible effect to all of the parts of the Guide. The Guide is interpreted as harmonized and not read or interpreted as creating a conflict. Individual sections of the Guide provide additional information and definition for specific student, course, school, and program types. These individual sections are not meant to stand alone or to contradict or supersede the general funding requirements of the Guide.

201 E. Colfax Ave., Denver, CO 80203; 303-866-6600; www.cde.state.co.us

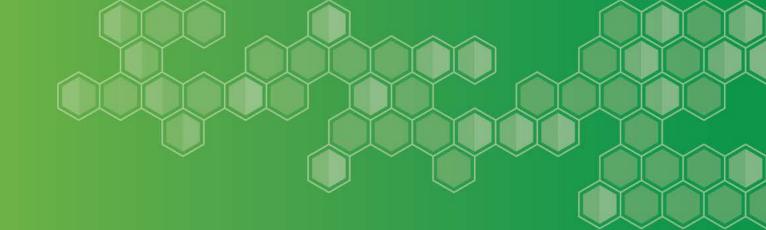
Colorado Revised Statutes, <u>www.lexisnexis.com/hottopics/colorado/</u> Code of Colorado Regulations, <u>www.sos.state.co.us/CCR/Welcome.do</u>



Student October Count Audit Resource Guide

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General Funding Requirements



Students Attending AECs

For funding purposes:



AECs are <u>not</u> considered a unique school type (unless some other criteria—such as being a Colorado public Online School or Program— applies).



Students attending AECs must meet the same general funding requirements as any other students.



If a unique student, course, school, or program type applies to a given student (such as work-based learning courses, etc.) then those additional funding and/or audit documentation requirements <u>do</u> apply.



Funding Requirements:

All funding requirements are based on the pupil enrollment count date and the 11-day count period.

General funding requirements:

- 1. Enrollment
- 2. Attendance
- 3. Scheduled Instructional Hours



To be eligible for funding, as of the pupil enrollment count date, students must:

- Be enrolled with the district
- Be younger than 21 years old
 - <u>Exception</u>: Students receiving services outlined in an Individualized Education Program (IEP) may turn 21 before the pupil enrollment count date in the semester of the pupil enrollment count date and still be eligible for funding
- Not have met the district's minimum graduation requirements
 - <u>Exception</u>: Students receiving services outlined in an IEP who have met the district's minimum graduation requirements are eligible for funding through age 21
 - <u>Exception</u>: Students are eligible for funding for a minimum of 4 years of high school. If the student meets the district's minimum graduation requirements before the 4th year of high school, the student may still be eligible for funding
 - <u>Exception</u>: Students who are being retained to participate in a 5th or 6th year extended high school postsecondary program (ASCENT, P-TECH, TREP)



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

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



Funding Requirements: Attendance

• Students must be present for all, or any portion of, the pupil enrollment count date (in any scheduled class)

<u>OR</u>

- If the student is absent for any reason on the pupil enrollment count date:
 - Must establish attendance (in any scheduled class) prior to the pupil enrollment count date during the current school year <u>AND</u>
 - Must resume attendance (in any scheduled class) within 30 days following the pupil enrollment count date
 - This assumes the students do not break their enrollment with the district
 - If the student withdraws from the during the current school year prior to the pupil enrollment count date—with the intention of leaving the district—and re-enrolls within 30 days following the pupil enrollment count date, the student is not eligible for funding

Exception: Students who are <u>only</u> scheduled into postsecondary courses off-site at the college



- Districts and schools must provide individual student schedules for all secondary (grades 6-12) 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 teacher-pupil instruction and contact time during the semester of the pupil enrollment count date:
 - Part-time funding: 90, but less than 360, hours
 - Full-time funding: 360+ hours



Funding determination for students taking postsecondary courses depends on the type of school and/or program:

ASCENT/CE/TREP:

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

Early College/Dropout Recovery Students

- Part-Time Funding = 3-6 semester college credits
- Full-Time Funding = 7+ semester college credits

Students may be eligible for full-time funding if they are:

- Part-time based on their high school scheduled teacher-pupil instruction and contact time (i.e., 90+ hours) <u>AND</u>
- Part-time based on their postsecondary credit hours (i.e., 3+ credit hours)



Calendar and bell schedule calculations should be conducted by districts and schools to determine, for each secondary school, the number of courses (or amount of time) necessary for part-time or full-time funding.

Resources:

- <u>Appendix A</u> of the <u>2022 Student October Count Audit</u> <u>Resource Guide</u> provides examples of how to conduct each of these calculations.
- Districts and schools can also reach out to the School Auditing Office for assistance in completing these calculations for funding determination.





AECs & Online Considerations





AECs and Online Schools

• Online School Or Program

- An "Online School or Program" is either a Colorado online public school, or online program, operated by a Colorado school district or BOCES that 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" <u>does not</u> refer to vendors of particular software, curriculums, or "online courses" (such as Edgenuity, CDLS, Gradpoint, K12, etc.) nor online schools or programs operating out of the state of Colorado (such as Florida Virtual Academy).
- If the AEC is a Colorado public online school, refer to the Online Schools and Programs section of the Audit Resource Guide
- A complete list of certified MDOL schools and SDOL schools and programs that have provided notification to the Office of Blended and Online Learning for the 2022-23 SY can be found at the following URL:

http://www.cde.state.co.us/onlinelearning/schools



Terminology

When determining teacher-pupil instruction and contact time or equivalencies for funding consideration, the following definitions apply.

• Credit Recovery Courses/Learning Labs/Sessions

• These are courses taken by students enrolled in brick-and-mortar schools (i.e., those with funding codes 80, 82, 85, or 86) in which **all of the instruction is regularly received in person on-site**, but students may be working through digital or online curriculum similar to a supplemental online or blended learning course.

Blended Learning Course

These are courses taken by students enrolled in brick-and-mortar schools (i.e., those with funding codes 80, 82, 85, or 86) in which some of the instruction is regularly received in person on-site and some of the instruction is received regularly off-site, digitally (with some element of student control over the time, place, path, and/or pace of participation).

• Supplemental Online Course

• These are courses taken by students enrolled in brick-and mortar schools (i.e., those with funding codes 80, 82, 85, or 86) in which **all of the instruction is received off-site**, digitally (with some element of student control over the time, place, path, and/or pace of participation).



Unless an AEC is a Colorado public Online School or has notified CDE of an existing Online Program (through the submission of Authorizer Assurances to the Office of Blended and Online Learning), **AECs must follow the same guidance regarding blended learning and/or supplemental online courses as any other brick-and-mortar school**.

 Refer to the "Blended Learning Courses" and "Supplemental Online Learning Courses" sections of the <u>Student October</u> <u>Count Audit Resource Guide</u> for details.



To include the digitally-delivered, off-site portion of course instruction in the determination for funding for Blended Learning and Supplemental Online Courses, the following <u>course documentation</u> must be provided at the time of audit (in addition to the required student level documentation):

- **Policy**: Local Board of Education definition of educational process which specifically includes Blended Learning and/or Supplemental Online courses.
- **Governance**: Description of district policy that outlines:
 - Acceptable synchronous/asynchronous ways in which teacher-pupil instruction and contact time can occur outside of the classroom
 - Acceptable ways in which attendance/participation will be documented during the off-site portion of the class
- Schedule clearly indicating the dates/times in which students receive inperson/synchronous instruction (per Course Requirement #3)
- List of all Blended Learning and Supplemental Online courses being offered during the fall term at each school



Course Requirements: Blended Learning and Supplemental Online Courses

The following <u>requirements</u> must be met in order to include Blended Learning and Supplemental Online <u>courses</u> in the determination for funding:

1. Limits on the number of courses that may be considered as instructional time for funding purposes

- Students can take at least one Blended Learning or Supplemental Online course
- Students may take up to two courses, as long as the second course does not result in a semester schedule that consists of a combined total of more than 40% Blended Learning and/or Supplemental Online courses
- Students with more than 3 Blended Learning and/or Supplemental Online courses will be evaluated as online students unless a Variance Waiver is granted

2. Courses must occupy unique positions on a student's schedule

3. Each course must be comprised of at least 20% weekly in-person or synchronous instruction

• Note: Supplemental Online courses offered through an approved or recognized online school or program are not subject to this requirement

4. Students must have access to equipment and sufficient internet access



The Variance Waiver waives the following course requirements only:

1. Limits on the number of courses that may be considered as instructional time for funding purposes

- Students can take at least one Blended Learning or Supplemental Online course
- Students may take up to two courses as long as the second course does not result in a semester schedule that consists of a combined total of more than 40% Blended Learning and/or Supplemental Online courses
- Students with more than 3 Blended Learning and/or Supplemental Online courses will be evaluated as online students unless a Variance Waiver is granted

3. Each course must be comprised of at least 20% weekly in-person or synchronous instruction

• Note: Supplemental Online courses offered through an approved or recognized online school or program are not subject to this requirement



If an AEC has implemented a learning model that operates outside of this posted Guidance for Blended Learning and Supplemental Online learning, it can submit a <u>Variance Waiver</u>.

- See "Appendix D" of the Student October Count Audit Resource Guide for details.
- Watch the recorded training from May 24, 2022 at <u>https://www.cde.state.co.us/cdefinance/auditunit_trainings</u>
- The deadline to request this waiver is August 15, 2022.





AEC Specific Considerations





Depending on the school design, some AECs may not be set up to follow a "traditional" bell schedule in which a student is provided a semester schedule showing the courses into which they are scheduled.

AECs providing students flexibilities regarding their on-site work must still have student schedules which clearly state (as of the pupil enrollment count date) the days and times in which students are scheduled to attend.



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, regardless of how the school organizes terms.



Student Schedule Considerations

- Student schedules should clearly show all courses or instructional sessions 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 (10/3/22)
 - Students should be aware of the courses, or the days and times into which they are scheduled, during the semester of the pupil enrollment count date
 - The AEC 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



AEC Student Schedule Example 1

 This AEC is structured into sessions that meet certain times/days each week, and each student is scheduled into one session for the semester

	Monday	Tuesday	Wednesday	Thursday	Friday	Total/week
Session	8:30am-3:30pm 1 30 min lunch	8:30am-3:30pm 30 min lunch	8:30am-3:30pm 30 min lunch	8:30am-3:30pm 30 min lunch	8:30am-3:30pm 30 min lunch	32.5 hrs/week
Session	8:30am-11:30 am 2 (no lunch)	8:30am-11:30 am (no lunch)	8:30am-11:30 am (no lunch)	8:30am-11:30 am (no lunch)	no session	12 hrs/week
Session	12:30pm-3:30pm 3 (no lunch)	12:30pm-3:30pm (no lunch)	12:30pm-3:30pm (no lunch)	12:30pm-3:30pm (no lunch)	no session	12 hrs/week

- In this scenario, the AEC would provide student schedules that indicate which session the student is scheduled to attend for the semester
- Depending on the calendar and bell schedule calculation, students scheduled into Session 1 are likely eligible for full-time funding; however, students scheduled into Session 2 or 3 are likely eligible for part-time funding



AEC Student Schedule Example 2:

• This AEC allows students to select which sessions they will commit to attend for the semester

	Monday	Tuesday	Wednesday	Thursday	Friday	Daily Hours
Session	8:30am-3:30pm 1 30 min lunch	8:30am-3:30pm 30 min lunch	8:30am-3:30pm 30 min lunch	8:30am-3:30pm 30 min lunch	8:30am-3:30pm 30 min lunch	6.5 hrs/day
Session	8:30am-11:30 am 2 (no lunch)	8:30am-11:30 am (no lunch)	8:30am-11:30 am (no lunch)	8:30am-11:30 am (no lunch)	8:30am-11:30 am (no lunch)	3 hrs/day
Session	12:30pm-3:30pm 3 (no lunch)	12:30pm-3:30pm (no lunch)	12:30pm-3:30pm (no lunch)	12:30pm-3:30pm (no lunch)	12:30pm-3:30pm (no lunch)	3 hrs/day

• A student semester schedule might look like this:

	Monday	Tuesday	Wednesday	Thursday	Friday	Daily Hours
Session				•	8:30am-3:30pm 30 min lunch	6.5 hrs/day
Session 2	8:30am 11.30 am (no lunch)				8:30am-11:30 am (no lunch)	3 hrs/day
Session 3		· · · ·		· · · ·	12:30pm-3:30pm (no lunch)	3 hrs/day

• This example student is scheduled for 18.5 hours of instruction each week. In order to determine if this is sufficient for full- or part-time funding, the AEC will need to conduct a calendar calculation



Depending on how the AEC is structured, how it documents daily attendance for funding purposes may vary.

For example:

- AEC has a standard bell schedule and students are scheduled into courses that meet per the bell schedule for the length of the term
 - Daily attendance captured in the student information system (SIS) is likely possible.
- AEC provides flexibility for the student to choose the days and times they will attend (for the length of the semester)
 - Because these combinations amongst all students may be difficult, additional documentation (beyond the standard attendance out of the SIS) may be needed.





At-Risk Count



<u>Reminder</u>: Starting with the 2021/2022 school year, the at-risk count includes both free <u>and</u> reduced-price lunch eligible students!

- Districts and schools will be expected to retain documentation supporting lunch eligibility status for any student reported as free or reduced-price lunch eligible in Student October.
 - This applies whether schools offer meals to students or not
- At-Risk Count Audit Resource Guide:
 - <u>http://www.cde.state.co.us/cdefinance/2022 at-risk audit resource guide</u>
- At-Risk Count Audit Overview Webinar:
 - Tuesday, August 23, 2022 at 10am
 - http://www.cde.state.co.us/cdefinance/auditunit_trainings



The Eligibility Process

Application or FEDS

Direct Certification

Categorical Eligibility Student determined to be free, reducedprice, or paid lunch eligible based on household size and income or assistance program information

 Student determined to be free lunch eligible based on participation in an approved assistance program

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



Seamless Summer Option

- Districts will not have the option to operate under the Seamless Summer Option (in which all students eat for free) during the 2022-23 school year.
- However, for the 2022-23 school year and per a USDA waiver, districts that operated under the Seamless Summer Option during the 2021-2022 school year and <u>do not have a current</u> <u>year eligibility determination</u> may use eligibility determinations from 2020-2021 or 2019-2020 during the 30day carryover period only.







English Language Learner Count





ELL Count Overview

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 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.



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 12th 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)

<u>In addition</u> to the above listed criteria, students must still be within the <u>five-year services window</u> defined in English Language Proficiency Act (ELPA).



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

For more information about ELPA, please visit: <u>http://www.cde.state.co.us/cde_english/elpa</u>



Resources and Training

English Language Learner Count

SCHOOL AUDITING OFFICE

English Language Learner Count



2022 Count Date: Monday, October 3

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 will be included in the calculated total program funding for each district. This new funding factor will include additional funding to districts related to the total number of English language learners included in the district's funded uppli count for the current year.

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

- Grade level: Kindergarten through 12th 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: <u>http://www.cde.state.co.us/cde.english/eipa</u>.

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 you send PII via a secure method. For example, an encrypted email, a secure file sharing tool like Syncplicity, or including the PII in a password protected document. If you have questions, contact CDE's Data Privacy Office at <u>dataprivacy@cde.state.co.us</u>.

Resource Guide

2022-2023 English Language Learner Count Audit Resource Guide (UPDATED 07/01/2022)

Prior Audit Resource Guides

Prior versions of the Audit Resource Guide can be found by clicking here.

Trainings

Internal CDE Resources

- English Language Learner Count Webpage:
 - <u>http://www.cde.state.co.us/cdefi</u> <u>nance/auditunit_ell_count</u>
 - Introduction to the ELL Count Audit:
 - Monday, September 13th at 10am
 - <u>http://www.cde.state.co.us/cdefinance/auditunit_trainings</u>





Questions?

08/09/22 (Tue) 10:00 AM Student October Office Hours





Contact:

School Auditing Office

Email: audit@cde.state.co.us Website: http://www.cde.state.co.us/cdefinance/auditunit

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