2022 Student October Count for Online Schools and Programs

August 2, 2022

- Student October Count Overview
- Student October Count Audit Resource Guide
  - Funding Requirements
  - Audit Documentation Requirements
  - Clarification to the Online School and Program section
- At-Risk Count
- English Language Learner (ELL) Count
- Contact Information
- Questions

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

Multi-District Online School	**Single-District** Online 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) • May accept students from across the state of Colorado • Per pupil funding is different than a brick-and-mortar school	• Must have current Authorizer's Assurances and corresponding policies on file with the Office of Blended and Online Learning • Generally serve students only from the authorizing district • Per pupil funding is the same as a brick-and-mortar school

Background

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

- Each year, all public school districts in the state of Colorado and the Charter School Institute participate in the Student October Count data submission.

- 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. Total program funding considers the following counts:
  - Funded pupil
  - At-risk
  - English language learner (ELL)

- After the data submission is final, and within 5 years following certification, all districts and CSI are subject to a compliance audit to ensure accurate reporting of the above noted counts.

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.
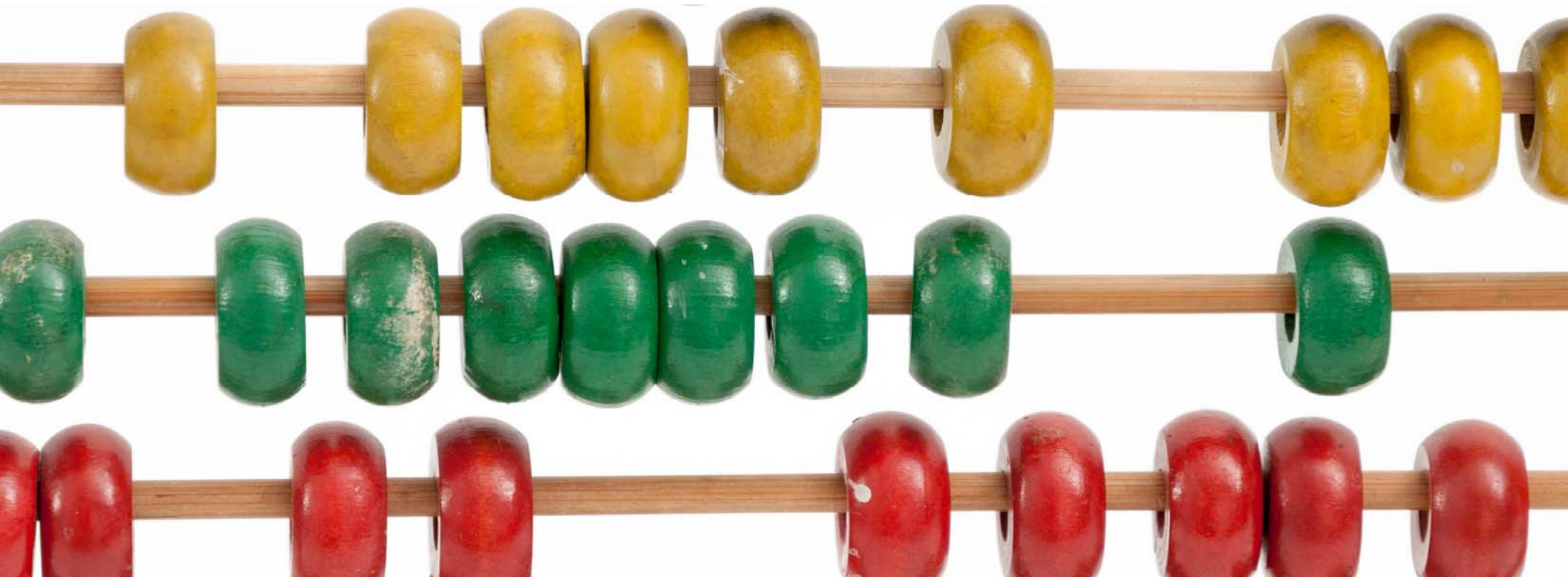
The 2022 pupil enrollment count date will be:

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	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	31					

November						
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 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.

Student October Count Audit Resource Guide

Student October Count Audit Resource Guide

- The Guide can be found on the School Auditing Office's Pupil Count webpage and is usually posted on or about July 1 for the upcoming school year: http://www.cde.state.co.us/cdefinance/auditunit_pupilcount

- The Student October Count Audit Resource Guide addresses:
  - Funding Requirements
  - Audit Documentation Requirements

- This Guide is intended to be read as a whole.
  - Individual sections of the Guide provide additional information and definition for specific student types, courses, schools, and program types.
  - The individual sections are not meant to stand alone or to contradict or supersede the general sections of the Guide.

- While the Guide has been developed to conform to state statute and the Code of Colorado Regulations (Administrative Rules), the Guide is not meant to be comprehensive and is not intended to replace state statute or administrative rules.

Student October Count Audit Resource Guide

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)

By:
Colorado State Board of Education
School Finance and Operations Division

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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, www.lexisnexis.com/hottopics/colorado/
Code of Colorado Regulations, www.sos.state.co.us/CCR/Welcome.do

Student October Count Audit Resource Guide

Table of Contents

The first 17 pages of the guide provide a general overview and primary funding and documentation requirements which apply to **all** students, regardless of the type of school or program in which they are enrolled and participate.

Student October Count Audit Resource Guide

Table of Contents

The next section of the guide addresses unique students, courses, schools, and programs.

Those listed are considered unique because:

1. The way in which a funding requirement is documented may vary from how they are documented for a traditional educational setting; <u>AND/OR</u>

2. They have additional funding requirements that must be met compared to students attending a traditional educational setting: <u>AND/OR</u>

3. They are an exception to the general funding requirement and documentation is necessary to show that the student meets the funding exception

Unique Students, Courses, Schools, and Programs

Funding Requirements
(for all students)

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

1. Be <u>enrolled</u> 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 <u>attendance</u> (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 <u>AND</u>
     - Resume attendance within 30 calendar days following the pupil enrollment count date

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:

   - <u>Part-time funding</u>: Student is scheduled to receive a minimum of 90, but less than 360, hours of teacher-pupil instruction and contact time in the semester of the pupil enrollment count date

   - <u>Full-time funding</u>: Student is scheduled to receive a minimum of 360 hours of teacher-pupil instruction and contact time in the semester of the pupil enrollment count date

Audit Documentation

- 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.

- School/Program Level Documentation
  - Authorizer Assurances

- Student-Level Documentation
  - Proof of Residency

New Authorizer Assurances

- **New** single-district online schools and programs <u>must</u> 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 encouraged to submit new <u>OR</u> updated Authorizer Assurances for the upcoming 2022-2023 school year

- Beginning with the 2022-2023 school year <u>each</u> online school and program must submit their own Authorizer Assurances

- The School Auditing Office references the Authorizer Assurances and accompanying attachments during the district's funded pupil count audit.

New Authorizer Assurances

This process has been updated starting with the 2022-2023 school year.

- Fill out an electronic Smartsheet form and include attachments
- Submit no later than September 20, 2022

The electronic Smartsheet form must include the following attachments:

1. Authorizer Assurance Signature Form

2. Local board policy defining and describing the <u>activities</u> 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 <u>each activity</u> 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 <u>only</u> those documents that are described in the Authorizer Assurances and for which samples have been submitted. <u>Failure to include board policy describing which activities may be used to demonstrate participation (with appropriate accompanying sample documentation) may result in audit adjustments.</u>

UPDATED Authorizer Assurance Signature Form

- This form (and accompanying documentation) outlines all the ways in which an online school or program can demonstrate online participation at the student level
- http://www.cde.state.co.us/onlinelearning/resources

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 <u>only</u> 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.

<u>Assurances</u>

☐ 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.

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 to: onlinelearning@cde.state.co.us

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.

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

Educational Activity	Documentation Demonstrating Attendance/Participation
Assessments	Assessment system report that includes student name, date of assessment and scores
Orientation	Student Sign-In Sheets
In-Person educational instruction	Student Sign-In Sheets; Student information system (SIS) attendance reports with in-person attendance code
Synchronous internet-based educational activities	Student information system (SIS) attendance reports with synchronous learning attendance code
Asynchronous internet-based educational activities	Learning management system (LMS) log-in reports showing completion of course specific activities

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

- http://www.cde.state.co.us/onlinelearning/resources
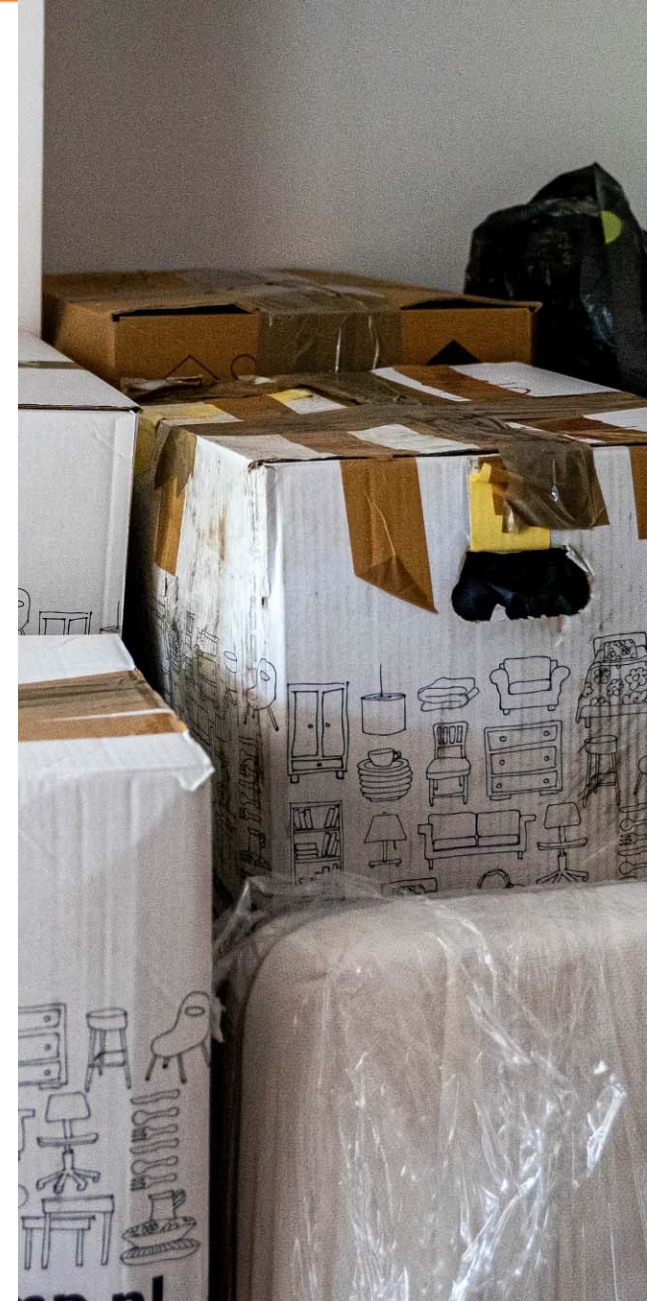
Online Signature Guidance

- Review the posted "Online Signature Guidance" specific to the following documents (as applicable):
  - **Affidavit of Residency** (for students enrolled in a Colorado public Online School or Program)
  - **Family Economic Data Survey (FEDS) form**

- Guidance can be found here: https://www.cde.state.co.us/cdefinance/school_auditing_online_signatures

- Please contact audit@cde.state.co.us with any questions.

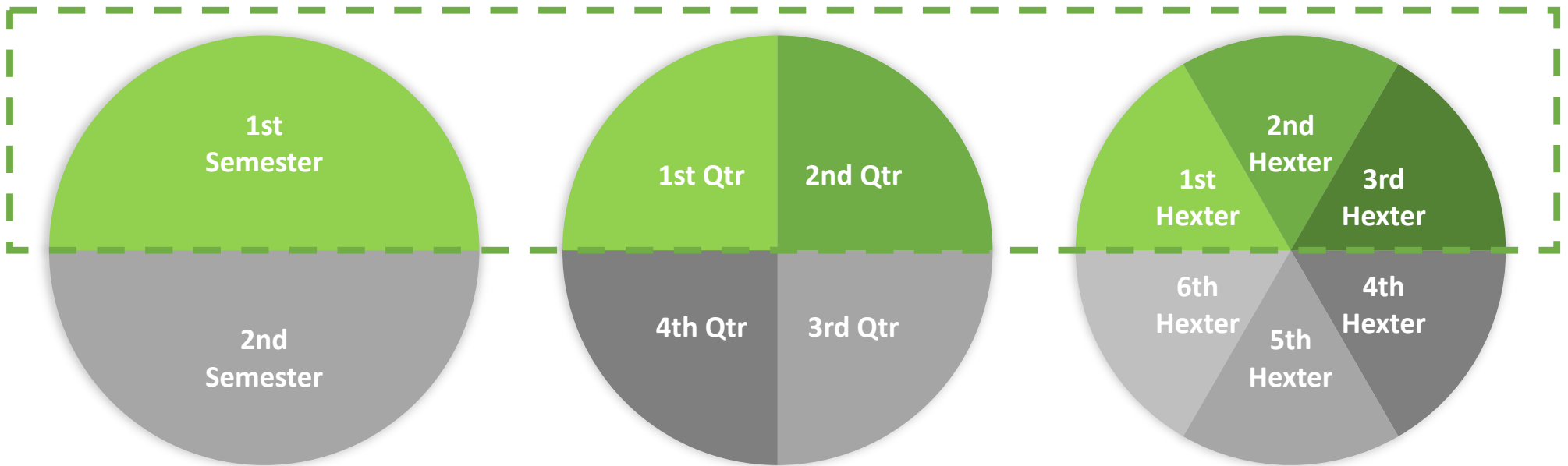# Online Schools and Programs Section of the Guide

- 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 (10/3/22)
  - 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

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.

- Online schools and programs are encouraged to work closely with their Authorizer to determine an appropriate equivalent teacher-pupil instruction and contact time per course

- Equivalency is meant to <u>emulate</u> the amount of teacher-pupil instruction and contact time a student would receive <u>in a traditional classroom setting</u>, 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

The required online course documentation is specific to the determination of full- and part-time funding eligibility

- Can be contained within a singular document (such as course catalog, vendor course guidebook, student handbook, etc.) or a combination of documents.
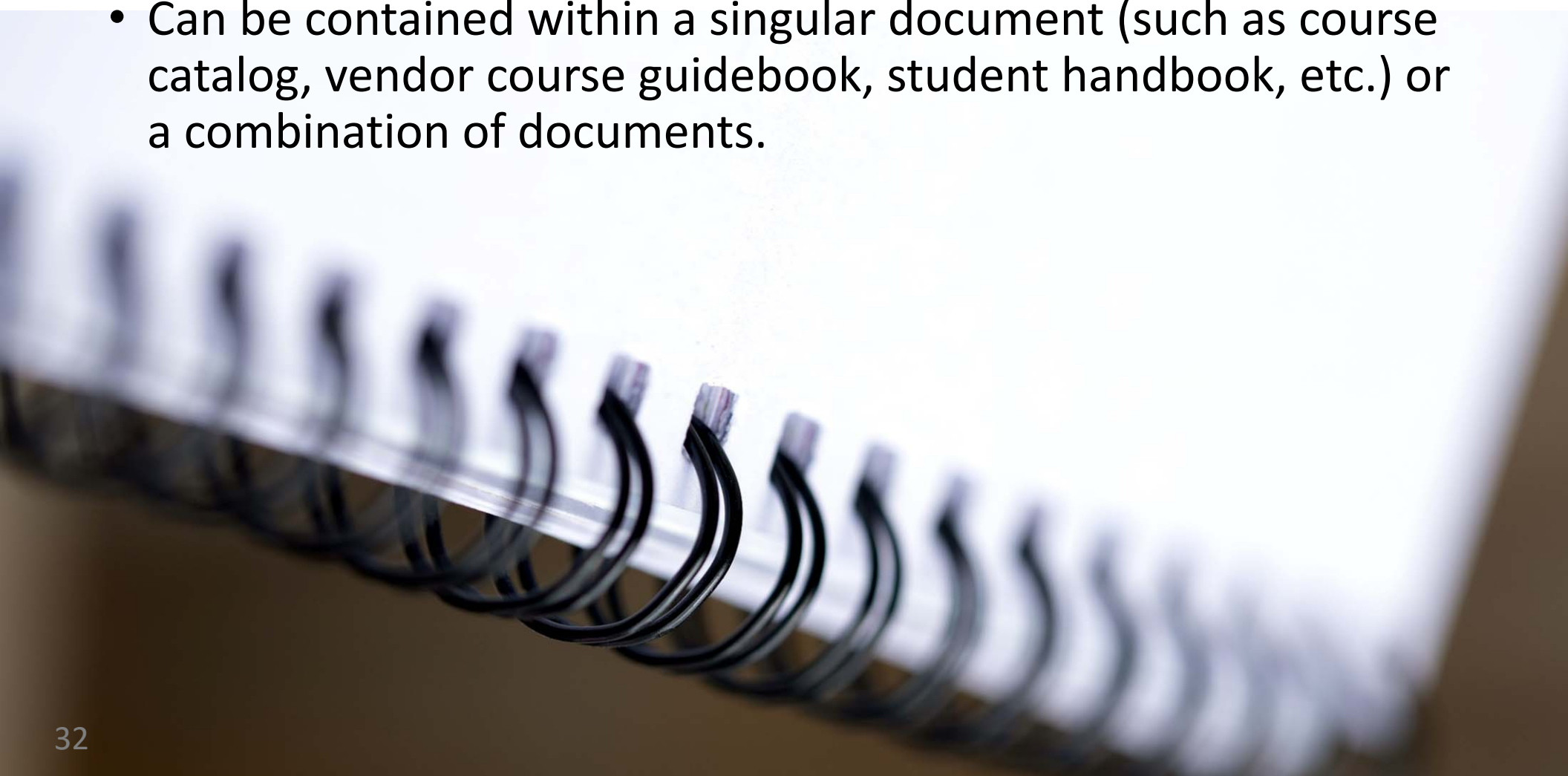
Course Catalog/Documentation*

Should include:

- Course code
- Course title
- Assigned semester credit hours
- Equivalent teacher-pupil instruction and contact time, AND
- A description of the course content

*Pursuant to 1 CCR 301-71-8.02, "the determination of full-time or part-time status is based upon the minimum number of hours provided for a student to receive instruction. Minimum hours can be based on the number of hours per day (or week) required to earn an equivalent number of credits in a traditional classroom setting." As such, information in the course documentation is necessary to ensure that a reasonable equivalent teacher-pupil instruction and contact time is being applied to each scheduled course in order to arrive at the appropriate funding level for each student.

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:
  - http://www.cde.state.co.us/cdefinance/2022_at-risk_audit_resource_guide
- 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

- 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 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

Family Economic Data Survey (FEDS) Form- Template

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

[Insert District Name] 20XX-20XX Family Economic Data Survey
Complete one survey per household. Please use a pen (not a pencil).

Apply online at **[Insert Webpage]**

STEP 1 — List all student's attending **[Insert District Name]** (if more spaces are required for additional names, attach another sheet of paper)

Student's First Name	MI	Student's Last Name	No Income	Birth Date (M M D D Y Y)	Grade	Foster Child	Head Start	Runaway	Homeless	Migrant

Check all that apply. Read Federal Economic Data Survey Application Instructions for more information.

STEP 2 — If household members (including you) currently participate in one of the following assistance programs: SNAP, TANF, or FDPIR list the case number below.

Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF/Colorado Works – Basic Cash Assistance or State Diversion), or Food Distribution Program on Indian Reservations (FDPIR). **Provide case number and skip to Step 4.**

SNAP Case Number   TANF Case Number   FDPIR Case Number

STEP 3 — Report income for ALL household members (Skip this step if you provided a case number in STEP 2)

A.   Student Income
Please include the **TOTAL** income, if any, received by all students' listed above.

Student Income $ How Often? Weekly / BH-Weekly / 2x Month / Monthly / Annually

B.   All Other Household Members (including yourself)
List all other household members not listed in Step 1 (including yourself) even if they do not receive income. For each household member listed, if they do receive income, report **TOTAL GROSS (BEFORE TAXES AND OTHER DEDUCTIONS)** for each source in whole dollars (no cents) only. If they do not receive income from any source, write '0'. If you enter '0' or leave any fields blank, you are certifying that there is no income to report.

Names of Other Household Members (First and Last)	Earnings from Work	How Often? (Weekly / BH-Weekly / 2x Month / Monthly / Annually)	Public Assistance/ Child Support/Alimony	How Often? (Weekly / BH-Weekly / 2x Month / Monthly / Annually)	Pensions/Retirement/ All Other Income	How Often? (Weekly / BH-Weekly / 2x Month / Monthly / Annually)
	$		$		$	
	$		$		$	
	$		$		$	
	$		$		$	

Total Household Members (Students' and Adults)

STEP 4 — Contact information and adult signature. Mail signed and completed application to: **[Insert School/District Mailing Address]**

"I certify (promise) that all information on this survey is true and that all income is reported. I understand that this information is given in connection with the receipt of Federal, State, and/or Local Education Program funds, and that school officials may verify (check) the information. I am aware that if I purposely give false information, my children may lose access to waivers of fees and the district/school may lose funding, and I may be prosecuted under applicable State and Federal laws."

CO

Mailing Address or PO Box   Apt. # or Lot #   City   Zip Code   Email Address

Phone   SIGNATURE of Adult Household Member   Printed First and Last Name of Signer   Today's Date

STEP 5 — Release of Information

The information provided on this survey will be used in conjunction with state educational programs and may be shared with Medicaid or State Children's Health Insurance Program (SCHIP) offices to seek enrollment of children into the above programs. Also, if your students qualify this information may be shared with the school/district for the purpose of waiving certain school/district program fees that your child(ren) might otherwise be required to pay. The school/district is not permitted to share your information with anyone else. You are not required to consent to the release of your information; this will not affect your student(s)' eligibility for school meals. Your information WILL be shared unless you check one of the boxes below.

☐ Do **NOT** share my information with any programs

Do not share my information with the programs I have checked: ☐ Medicaid/SCHIP   ☐ List Specific Program   ☐ List Specific Program   ☐ List Specific Program   ☐ List Specific Program

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 year eligibility determination</u> may use eligibility determinations from 2020-2021 or 2019-2020 during the 30-day carryover period only.
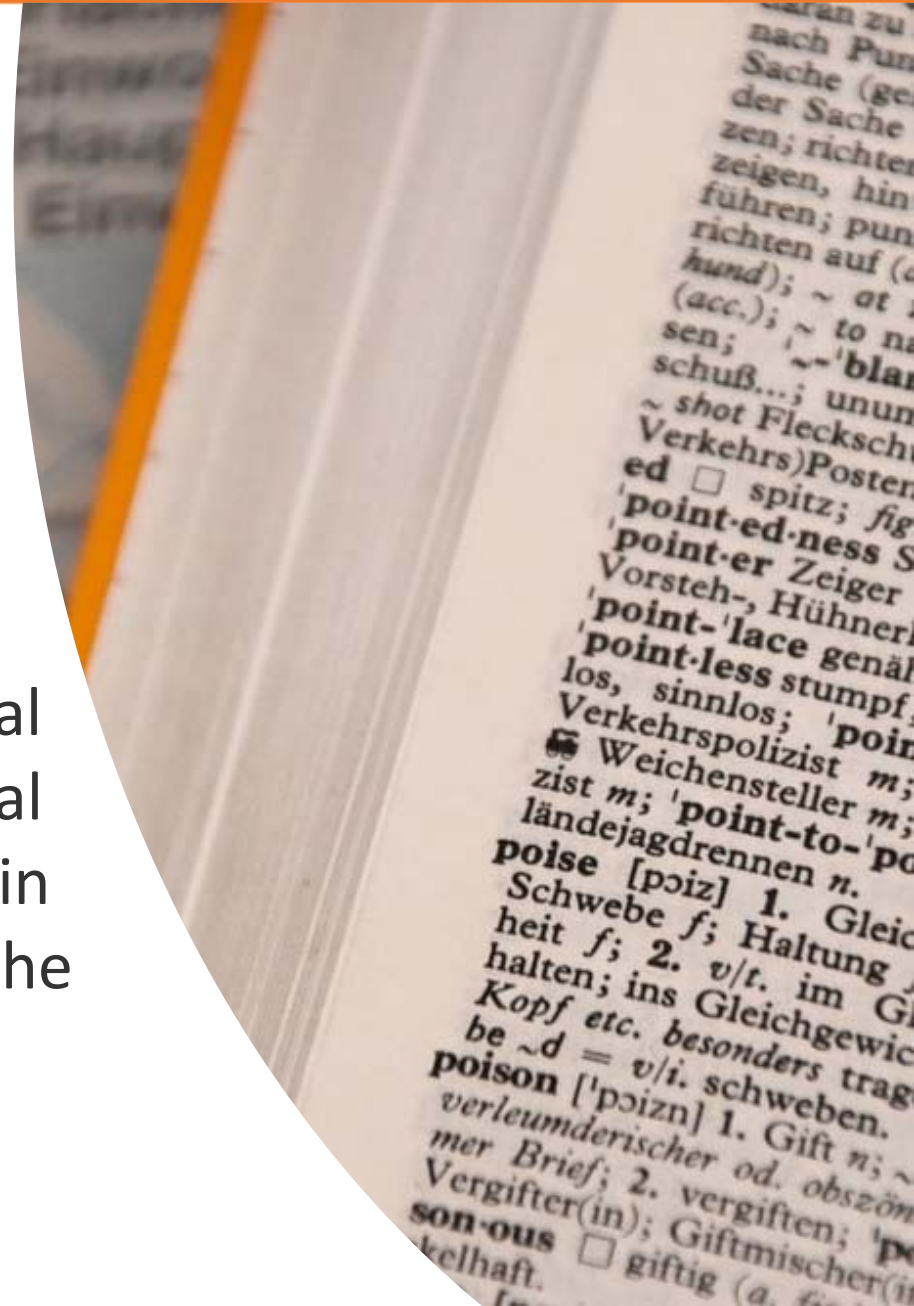
English Language Learner Count

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)

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

- English Language Learner Count Webpage:
  - http://www.cde.state.co.us/cdefinance/auditunit_ell_count

- Introduction to the ELL Count Audit:
  - **Monday, September 13th at 10am**
  - http://www.cde.state.co.us/cdefinance/auditunit_trainings

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Questions?

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

Contact

School Auditing Office:
Rebecca McRee
mcree_r@cde.state.co.us

School Auditing Office Website
http://www.cde.state.co.us/cdefinance/auditunit

Office of Blended and Online Learning:
Renee Martinez
martinez_r@cde.state.co.us

Office of Blended and Online Learning Website
http://www.cde.state.co.us/onlinelearning