



DRAFT UPDATED 04/30/2021

The Student October Count Audit Resource Guide describes the requirements for funding eligibility for all students. Further, it contains all required audit documentation necessary to evidence those requirements have been met.

The Student October Count Audit Resource Guide is updated and posted during the summer preceding the upcoming school year.

The guidance provided in this document is meant to be a preview for updates to the “Supplemental Online Courses” section that will be included in the 2021 Student October Count Audit Resource Guide.

- If your district has developed a learning model that does not fall within the parameters of this guidance, please contact audit@cde.state.co.us by June 30, 2021 for additional information.

This guidance only applies to courses offered to students who are “primarily” enrolled in a traditional, brick-and-mortar school (i.e., those whose reported Student October Count funding codes are 80, 82, 85, or 86).

This guidance does not apply to students who are enrolled in a CDE-approved Online School or Program (i.e., those whose reported Student October Count funding codes are 91, 92, 94, 95, or 96), or those who are participating in a district’s [Remote Learning Option \(K-12\) for the 2021-2022 School Year as a Result of COVID-19 Health Concerns](#).

Overview: Student Funding Requirements

In general, students’ funding eligibility is based on their enrollment, attendance, and scheduled teacher-pupil instruction and contact time. For the most part, these requirements are met in a traditional brick-and-mortar educational setting (i.e., “seat-time”).

- Enrolled with the district as of the pupil enrollment count date (usually 10/1)
- Attend on the pupil enrollment count date or, if absent for any reason:
 - Establish attendance during the current school year prior to the pupil enrollment count date AND resume attendance within 30 calendar days following the pupil enrollment count date
- Scheduled to receive the minimum number of teacher-pupil instruction and contact time hours during the semester of the pupil enrollment count date
 - Part-time funding: at least 90, but less than 360, hours in the semester of the pupil enrollment count date
 - Full-time funding: 360+ hours in the semester of the pupil enrollment count date

In some cases, instruction occurring outside of the traditional classroom may be used in the determination for funding. To be considered for funding, these courses must meet additional program

and documentation requirements. These requirements are described in the Student October Count Audit Resource Guide.

What are Supplemental Online Courses?

“Supplemental online courses” refer to **courses** taken by students enrolled in traditional, 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). The additional course and documentation requirements necessary to include these courses in the determination for funding are described below.

These courses are meant to *supplement* a student’s brick-and-mortar schedule; a student enrolled in a brick-and-mortar school should never be primarily scheduled into supplemental online and/or blended learning courses.

Courses that are offered to students enrolled in brick-and-mortar schools through a CDE-approved Online School or Program, and courses offered through brick-and-mortar schools that are conducted 100% digitally, off-site, are considered “supplemental online” courses.

- Courses that are offered 100% on-site are not considered supplemental online courses.
- Courses that require both in-person and digitally-delivered instruction are considered “[blended learning](#) courses.”
- Courses offered to student enrolled in brick-and-mortar schools, through CDE-approved Online Schools and Programs, will be evaluated as “supplemental online” courses.

Supplemental online courses may be offered through:

- 1) CDE-approved Online Schools and Programs
- 2) third-party course providers or vendors (e.g., CDLS, Edgenuity, Florida Virtual, etc.)
- 3) a district or school that has developed a course “in-house”

Depending on how the supplemental online course is being offered, the course and documentation requirements may be different, as described below.

Course Requirements

Supplemental online courses must meet the following requirements in order to be considered in the determination for funding.

- 1) **Limits on supplemental online courses:** The number of supplemental online courses that may be considered as instructional time for funding purposes is limited.
 - a. Any student enrolled in a brick-and-mortar school may take **one** supplemental online or blended learning course to be included in the determination for funding, regardless of their schedule or funding level.
 - b. If a student enrolled in a brick-and-mortar school wishes to take **two** supplemental online and/or blended learning courses in a semester, the second course may be included for funding as long as it does **not** result in a semester schedule that consists of

- a combined total of more than **40%** supplemental online and/or blended learning courses.
- c. If a student enrolled in a brick-and-mortar school is enrolled in three or more supplemental online and/or blended learning courses, the student will be evaluated as an online student unless the school/district has received an [approved variance](#) from CDE.
 - i. A student can only be evaluated as an online student if they are enrolled in a CDE-approved Online School or Program.
- 2) **Student Schedules:** Supplemental online courses must occupy unique positions on a student’s schedule.
- a. A student should not be scheduled for another course or activity during the time frame reserved for the course.
 - b. Supplemental online courses must be individual courses only; “study blocks” or multi-use periods may not be considered as supplemental online courses.
 - c. When calculating the weekly instructional time for supplemental online courses, the School Auditing Office will use the average instructional time as determined by the brick-and-mortar in-person bell schedule calculation to evaluate the entire course.
- 3) **Synchronous Instruction:** If a supplemental online course is not offered through a CDE-approved Online School or Program, then at least 20% of a student’s weekly scheduled instructional time in a supplemental online course must be synchronous learning activities as described below; the remaining time must be comprised of asynchronous learning activities, as described below.
- 4) **Access to Equipment and Sufficient Internet Access:** Districts must ensure students participating in supplemental online courses have the appropriate electronic equipment and resources to participate in the course. Specific district and school responsibilities include ensuring supplemental online courses meet the needs of students with IEPs and English Learners.
- a. Instruction must be aligned with Colorado Academic Standards and Colorado English Language Proficiency Standards and the course educators must meet state and federal educator licensure and qualification requirements--particularly for educators working with students with disabilities or English Learners (ELs).
 - b. Each student with an IEP must receive the special education and related services, supplementary aids and services, accommodations, and modifications described in the IEP.

Synchronous and Asynchronous Learning Definitions

If a supplemental online course is not offered through a CDE-approved online school or program, then at least 20% of the student’s weekly scheduled instructional time in a supplemental online course must be synchronous learning activities; the remaining time must be comprised of asynchronous learning activities.

“Synchronous learning” is real-time teacher-to-student instruction.

- This could be in the form of whole class, small group, or one-on-one instruction.

- Examples include live-streaming classes (via Zoom, Google Meet, Microsoft Teams, Conference Calls, etc.), reading groups through a virtual platform, peer-to-peer breakout rooms, other peer-to-peer learning activities, etc.

“Asynchronous learning” is teacher-to-student instruction that does not occur in real-time.

- Examples of asynchronous learning that involve daily teacher-to-student instruction for each course include, but are not limited to:
 - A recorded morning greeting, read aloud, and/or lesson where the teacher is modeling a strategy (e.g., a student was not able to attend synchronously at the scheduled time and views the recording at a different time).
 - Discussion board activity where students contribute to a teacher-facilitated class discussion at different times.
 - Use of a choice board in which a student can choose how they will demonstrate learning of a concept (done independently but tied to the overall instruction with follow-up from the teacher).
 - Virtual field trip (tied to content) where students can participate at different times.
 - Completion of work, a quiz, or a test that is meaningful and tied to content.
 - Offline work that is facilitated by a teacher who has provided instruction and then releases the students to practice a skill or complete a project, then gathers students together to conclude the lesson or meets individually (similar to a “writing workshop” in an in-person class).
- Below are some examples of activities that districts may consider to be asynchronous learning that, **if provided in isolation without daily teacher-to-student instruction for each individual course**, do not meet the definition of asynchronous learning:
 - Posting assignments in Google classroom, or other platform, and giving students an entire day to work independently to complete and turn-in the assignments. Further, if the student needs assistance, they are expected to email the teacher who then has 24 hours to respond.
 - Students are provided a link to an app and told to “practice” (such as math facts, a reading app, etc.)
 - Asking students to watch YouTube videos to supplant teacher instruction.
 - Providing a digital curriculum with pre-recorded videos that the student clicks through at their own pace (i.e., the digital curriculum is being relied upon wholly to “instruct” the students.)

Course Documentation Requirements

In order to include supplemental online courses in the determination for funding, the following documentation must be provided at the time of audit:

- A district board of education definition of the educational process (e.g., in board policy, board resolution, governance document, etc.), which includes off-site supplemental online courses
- Documentation (e.g., regulations, course syllabus, handbook, etc.) outlining district policy (if not included in board policy) that describes the following:
 - Acceptable synchronous and asynchronous ways in which teacher-pupil instruction and contact time can occur outside the classroom (i.e., remotely).

- Acceptable ways in which attendance/participation should be documented for asynchronous learning days
- Documentation which clearly indicates the amount of time in which a student is receiving synchronous instruction
 - Schedule documentation must show that [Course Requirement 3](#) (above) has been met
- Schools must clearly identify all supplemental online courses offered at the time audit (for example, a list that matches the course titles listed on the students' individual schedules)

Note: In the event the above noted documentation is not provided at the time of audit, off-site supplemental online courses will not be considered in the determination for funding.

Reference

[Section 22-30.7-105.](#)

[1 CCR 301-71](#)

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

[Section 22-5-119.](#)

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