



COLORADO
Department of Education

October Count: What's New for Program and Curriculum Leaders?

June 6, 2024

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
- Highlight important changes to the Rules for the Administration of the Public School Finance Act starting in Fall 2024
- Define Direct & Alternative Instruction Courses

Introduction

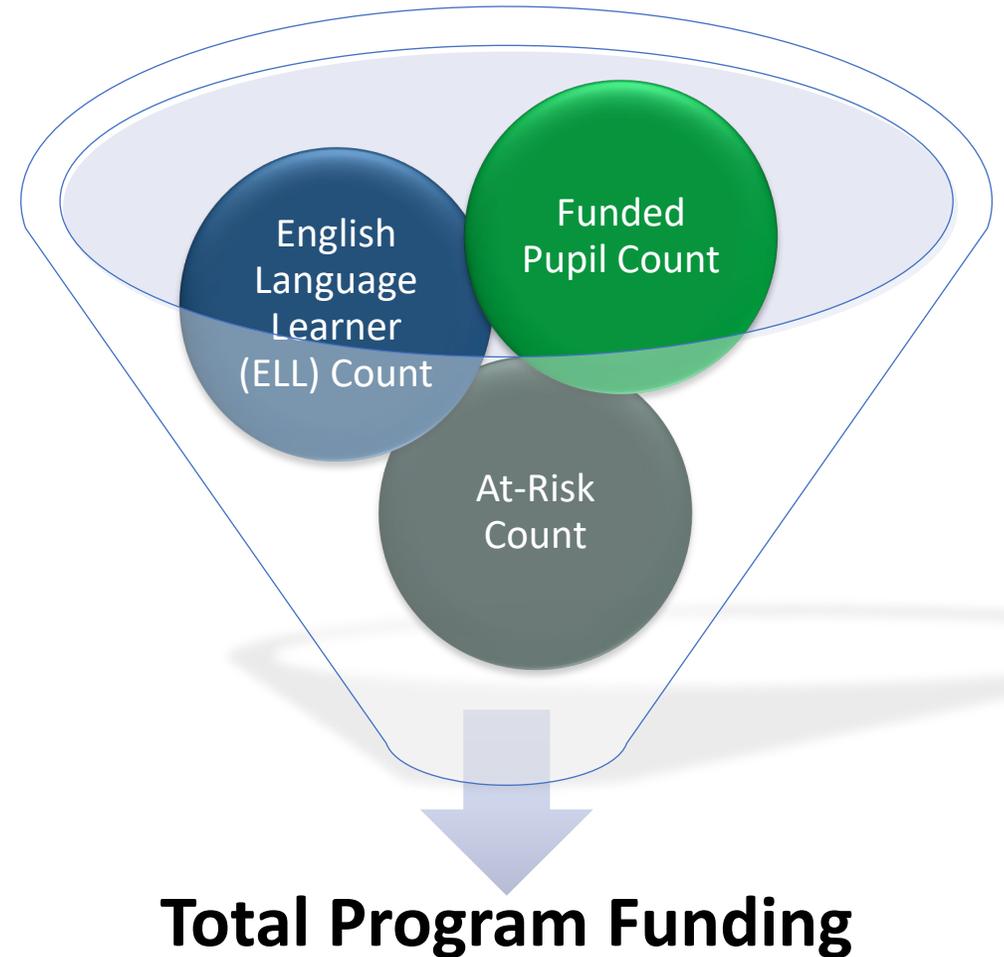
The School Finance Unit at CDE calculates the total pupil and at-risk funding (known as “Total Program” funding) based on district-reported data included in the Student October Count data submission.

The School Auditing Office:

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

Counts From Student October Data Collection Determine Total Program Funding

- School districts in Colorado are funded by a variety of sources
- The biggest source of funding comes from the School Finance Act
- The amount a district receives according to the School Finance Act is called **Total Program**
- Counts from the Student October Count Data Collection are used to calculate Total Program Funding



- When reporting data in the Student October Count data submission, it is very important for districts and schools to 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:
 - Significant audit findings for the district
 - (i.e., the district owing money back to CDE or not receiving all eligible funds prior to audit)
 - Impacts to funding for districts across the state of Colorado
 - Impacts continuing from the current year to future years

Student October Count Data Submission



Total Program funding is calculated based on student counts; not specific programs or courses.

To report a student eligible for funding, the district **must** be prepared to provide all required documentation (as described in the Guide) to support funding eligibility

2024 Student October Count Audit Resource Guide (a.k.a. the “Guide”)

- Located on the [Pupil Count](#) webpage
- Final version will be posted no later than July 1, 2024
- Contains a description and listing of all funding and audit documentation requirements
 - Failure to provide evidence of funding eligibility may result in loss of funding during the audit process
- All districts/BOCES will be required to participate in the Annual Audit Review starting with the 2024/2025 school year; this will require districts/BOCES to complete all applicable audit questionnaires and upload preliminary audit documentation by Wednesday, December 11, 2024.
- Districts/BOCES will be notified in Spring 2025 if they will be required to participate in a focused or comprehensive audit review in response to the 2024 Student October Count data submission.

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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

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



Funding Requirements: Enrollment



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

- Be enrolled with the district, or eligible as a transfer enrollment exception
- In general, least 5 years old, but younger than 21 years old
- In general, not have met the district's minimum graduation requirements
 - Students with an IEP are eligible for funding through age 21
 - Students are eligible for funding for a minimum of 4 years of high school
 - Students who are participating in a 5th or 6th year extended high school postsecondary program (ASCENT, P-TECH, TREP)

Funding Requirements: Attendance

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

OR

- 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 AND
 - Must resume attendance (in any scheduled class) within 30 days following the pupil enrollment count date
 - This assumes the student does not break their enrollment with the district
 - If the student withdraws 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 only scheduled into postsecondary courses off-site at the college

Funding Requirements: Scheduled Instructional Hours

- 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 instructional time (direct or alternative) 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

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.

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 of the new rules 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.

- **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” does **not** 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 a district is operating a Colorado public online school or program, refer to the Online Schools and Programs section of the Audit Resource Guide, and listen to the accompanying [training](#) that occurred on 5/20/24.
- A complete list of certified MDOL schools and SDOL schools and programs that have provided notification to the Office of Blended and Online Learning is available on the [Multi-District and Single District Online Schools & Programs List](#) webpage (<http://www.cde.state.co.us/onlinelearning/schools>).

Blended Learning Initiative (BLI) Variance Waiver



- Beginning with the 2024/2025 school year, the BLI variance waiver will no longer be available.
- Districts and schools that requested and were granted this waiver between 2021 and 2023 will no longer have this option.
- All brick-and-mortar schools and programs (not classified as online schools/programs) must follow the requirements for blended learning and supplemental online courses.



Instruction Types In the Updated 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**.



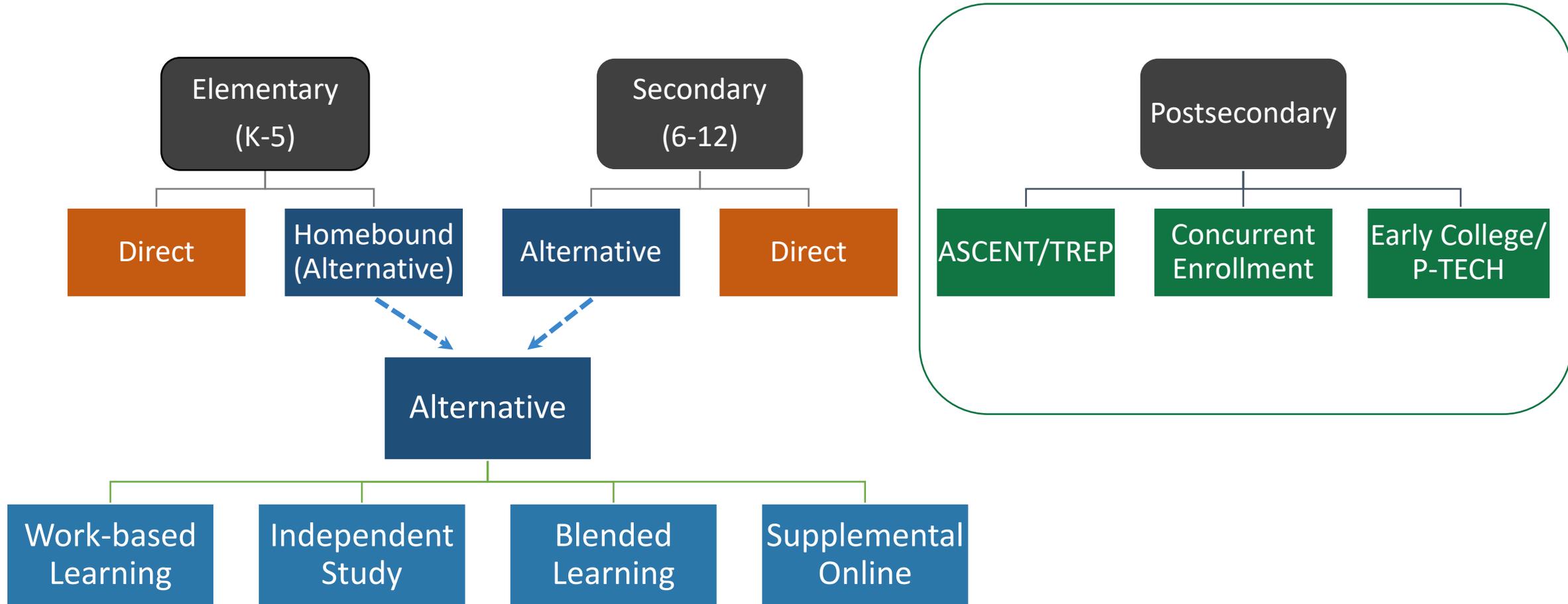
Instructional Time Under New Rules: The “Big Picture”



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



Instructional Types of Courses In the Updated Rules





Courses Using Alternative Teacher-Pupil Instruction In the Updated Rules

Course Type	Description
Blended Learning	<ul style="list-style-type: none">• Credit-bearing courses for a student enrolled in a traditional brick-and-mortar school• where some of the direct instruction is regularly received in-person and on-site and• some of the digitally-delivered asynchronous instruction is received off-site<ul style="list-style-type: none">• (with some element of student control over the time and place of participation).
Independent Study	<ul style="list-style-type: none">• Credit-bearing courses• in which some or all of the course is being completed off-site, independently by the student.• They include the provision of content aligned to grade-level standards (where applicable)<ul style="list-style-type: none">• and are substantially equivalent to a traditional course.• For funding, this course must have a written learning plan that includes:<ul style="list-style-type: none">• the course outline or plan of study,• the digital or print curriculum or materials to be used,• requirements for submitting assignments and recording the academic progress, and• the role of the supervising licensed teacher.• No more than 1 independent study course can be used in the determination for funding.
Supplemental Online	<ul style="list-style-type: none">• Credit-bearing courses taken by students enrolled in traditional, brick-and-mortar schools• in which all of the instruction is digitally delivered and<ul style="list-style-type: none">• is received off-site or• is taken on-site but not at a scheduled time where attendance is mandatory.
Work-Based Learning	<ul style="list-style-type: none">• Credit-bearing courses• that must be incorporated within the student's Individual Career and Academic Plan (ICAP) in order to qualify for funding.• They are learning opportunities that occur in part or in whole in the workplace and• provide the learner with hands-on, real-world experience.



- 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 **brick-and-mortar student** is scheduled into any of these alternative instruction courses during the Fall semester.

- **Proof of Colorado Residency:** Pupils exclusively enrolled in alternative teacher-pupil instruction **or** any pupil that has a schedule that does not require the pupil's regular physical presence at the public school, the district must verify and document student residency in the State of Colorado upon enrollment and annually thereafter.
- **Online Program:** Pupils **exclusively enrolled in online K-12 courses** that take place off-site, but are not enrolled in an online school, must be enrolled in an online program.
 - A student is not exclusively enrolled in online K-12 courses if they have at least one course scheduled to take place on-site, in-person, at a regularly scheduled time during regular school hours and where attendance is mandatory.

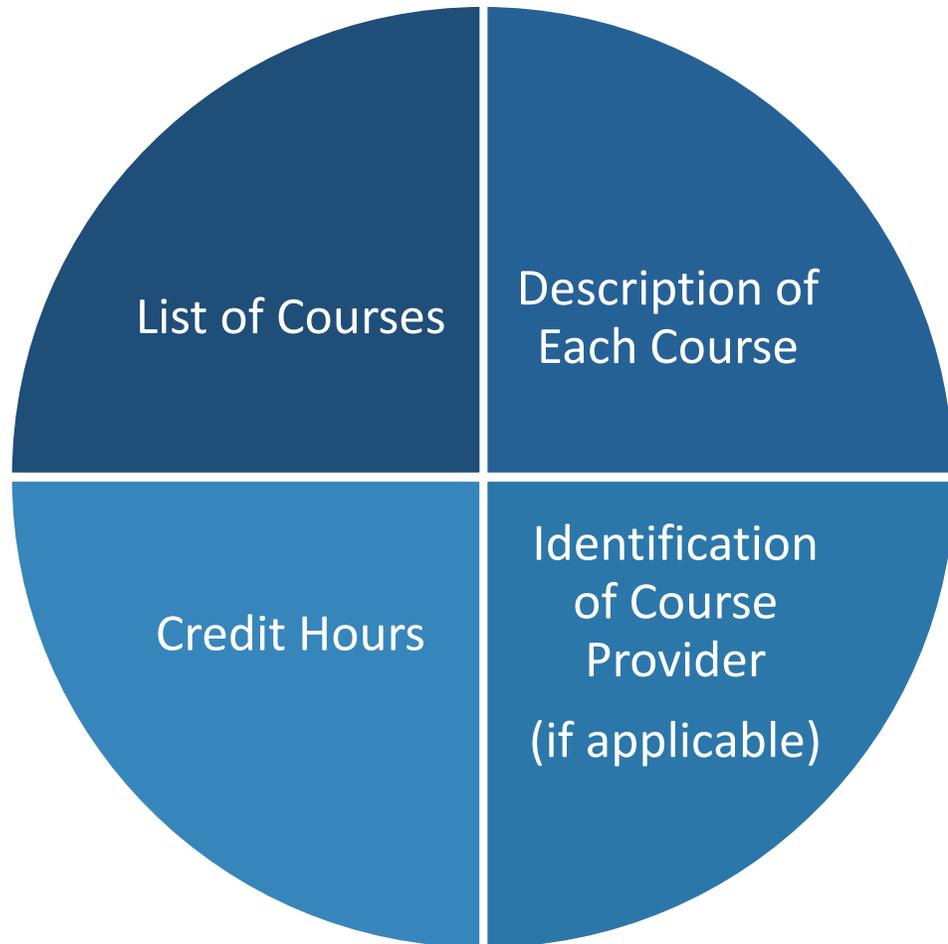
- **Attendance:** For alternative instruction courses, the district must provide attendance verification which is limited to:
 - Evidence of attendance in direct instruction content
 - Logins into course content for digitally-delivered instruction
 - For work-based learning courses, documentation from an employer (e.g., timesheets, paystubs) that lists a student's name and dates worked
- For Independent Study courses, districts may submit a “Request for Alternative Attendance Documentation” to the School Auditing Office by September 15.



Does this combination of courses result in special considerations?



Funding Course Considerations for Student Enrolled in a Brick-and-Mortar School	Proof of Colorado Residency Required	Must be enrolled in an Online Program or School	Special Attendance Considerations
All courses are 100% in person	No	No	No
All courses are blended learning	No	No	No
All courses are supplemental online	Yes	Yes	No
All courses are supplemental online and independent study (1 class only)	Maybe	No	Maybe
All courses are supplemental online and work-based learning	Yes	No	No
All courses are work-based learning	Yes	No	Yes



- 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.



Instructional Time Equivalency for Alternative Teacher-Pupil Instruction Courses

Calendar calculation:
85 days/semester

In-person bell schedule:
50 average daily minutes

Semester hours per period:

- 85 days x 50 minutes = 4,250 minutes per semester for semester course
- 4,250 minutes ÷ 60 minutes per hour = **70.83 hours**

Alternate Instructional Time Equivalency

Based on 100% in-person on-site calendar and bell schedule calculation:

- **70.83 hours of equivalent instruction per semester course**



Equivalency for Alternative Instruction Courses

The number of instructional minutes for Alternative Instruction courses must align with the number of instructional minutes received in a Direct Instruction course conferring the same amount of credit.

Average Daily Minutes of Direct Instruction from bell schedule calculation	Credits awarded for course	Equivalent Daily Alternative Instruction Minutes
30	0.25	30
50	0.50	50
90	0.75	90

- 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.

Action Item: Consider recalculating instructional time for all secondary schools to determine if this changes the number of courses needed to qualify for full- or part-time funding.

Additional Known Updates

Additional Known Updates based on Updates to Board Rule (Part-time Students)

Part-time students (1 CCR 301-39 (5.06)(1))

- For part-time students in grades 1-12 the district must be prepared to provide a statement describing the reasons the student is enrolled part-time AND confirming how the student is compliant with the compulsory school attendance requirements.
- Students in the following categories don't need a separate statement:
 - 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 based on Updates to Board Rule (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](#) webpage on or before July 1, 2024.

- In order to include work-based learning courses in the determination for funding, the district will need to be able to provide documentation that shows these courses have been incorporated within the student's ICAP.
- Documentation must include the following:
 - Title/ label of "ICAP" (Individual Career and Academic Plan)
 - Student's name
 - Term for which it applies (i.e., Fall 2024)
 - Date the document was created/updated
 - Identify what WBL opportunity the student will be pursuing
 - Describe how the WBL opportunity addresses or connects to the student's postsecondary goals

Next Steps

As your district is contemplating its offerings next year, what are your district's expectations regarding students' ability to enroll in courses using alternative instruction?

- Will your district be offering all types of alternative instruction courses?
- Are there district limitations on who is eligible to enroll in these course types?
- Are there district limitations on the number or type of alternative instruction courses students can take?
- Districtwide, must all digital content for supplemental online courses be purchased from a specific course provider?
- Does your district have restrictions on how blended learning courses are delivered (e.g., is there a minimum amount of direct instruction the district expects each blended learning course will provide)?
- How does your district plan to track the days/times students are receiving direct instruction (specifically, when are students expected to be in a physical or virtual classroom with their teacher)?

These questions may guide you in your implementation plan.

- Identify if your district/school/BOCES will be offering courses to brick-and-mortar students that utilize alternative teacher-pupil instruction during the 2024/2025 school year that may be used for funding purposes. If yes, then:
 - Create and post a “catalog of courses using alternative teacher-pupil instruction” to the district/school/BOCES website no later than the applicable count date.
 - Create a process to identify which secondary students (and homebound students in grades K-5) are scheduled into courses utilizing alternative teacher-pupil instruction during the fall semester.
- Determine how your district will document that specific work-based learning opportunity courses have been incorporated into individual student ICAPs

Resources

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](#)

School Auditing Office's Scheduled Training and Office Hours for the upcoming 2024 Student October Count

- **Public School Finance Act Update--Office Hours** June 13, 2024 (1PM)
- **Student October: Intro to the Audit Resource Guide (2 hrs.)** July 16, 2024 (1PM)
- **Student October: Calendar & Bell Schedule Calculations** July 18, 2024 (10AM)
- **Preparing for the New Annual Audit Review** July 23, 2024 (10AM)
- **Student October: What's New for (Pupil Count) Audit Contacts?** July 30, 2024 (10AM)
- **At-Risk Count Audit Overview** August 8, 2024 (1PM)
- **English Language Learner Count Audit Overview** September 17, 2024 (10AM)
- **Duplicate Count Office Hours** November 5, 2024 (10AM)

[Training and Office Hours](https://www.cde.state.co.us/cdefinance/auditunit_trainings) website (https://www.cde.state.co.us/cdefinance/auditunit_trainings)

School Auditing Office

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Questions?