



COLORADO
Department of Education

Office Hours-

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

June 13, 2024

Recap

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 for an individual school, if needed
- If a student is present in at least one class before the count date, but is absent on the count date, they may still be eligible for funding if they return within 30 days of the count date. In 2024, that day is **October 31**.



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**.

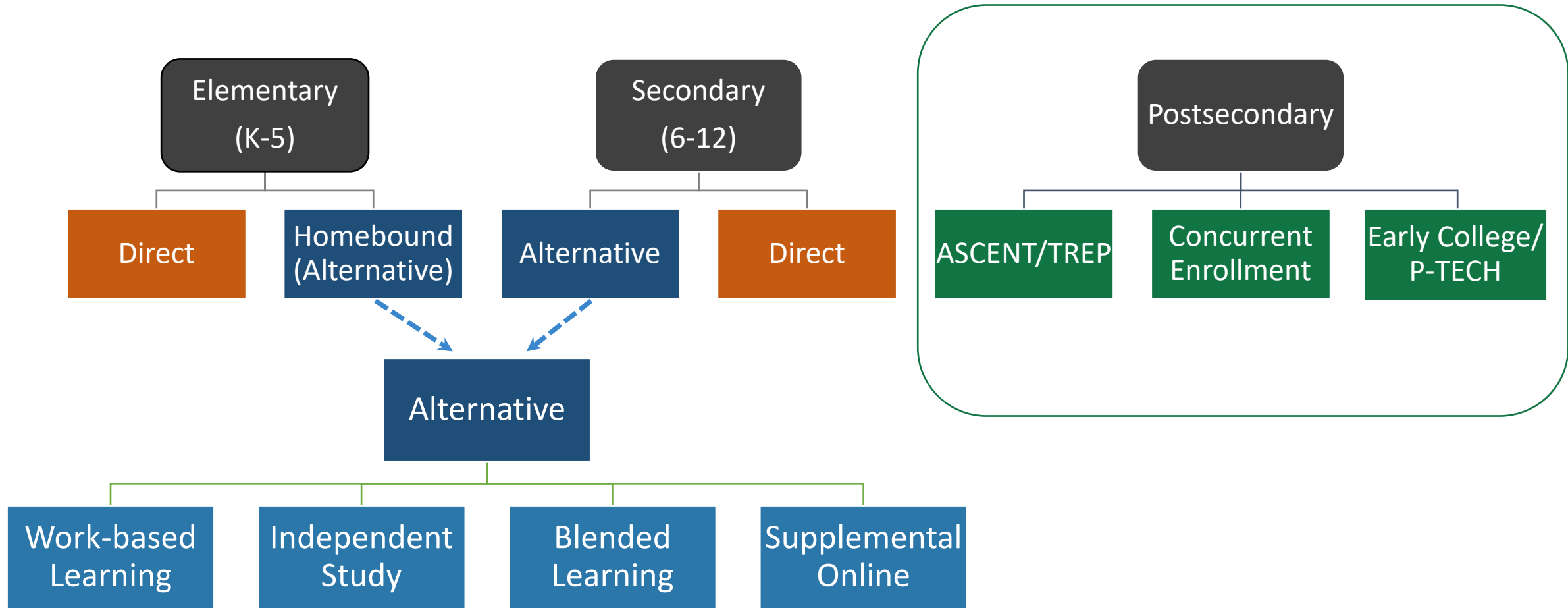
Direct instruction also includes engagement with educational content in courses, such as study hall or advisory or credit recovery lab or independent study, that are on-site at a scheduled time during regular school hours and for a set amount of time and where attendance is mandatory.

“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 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. |



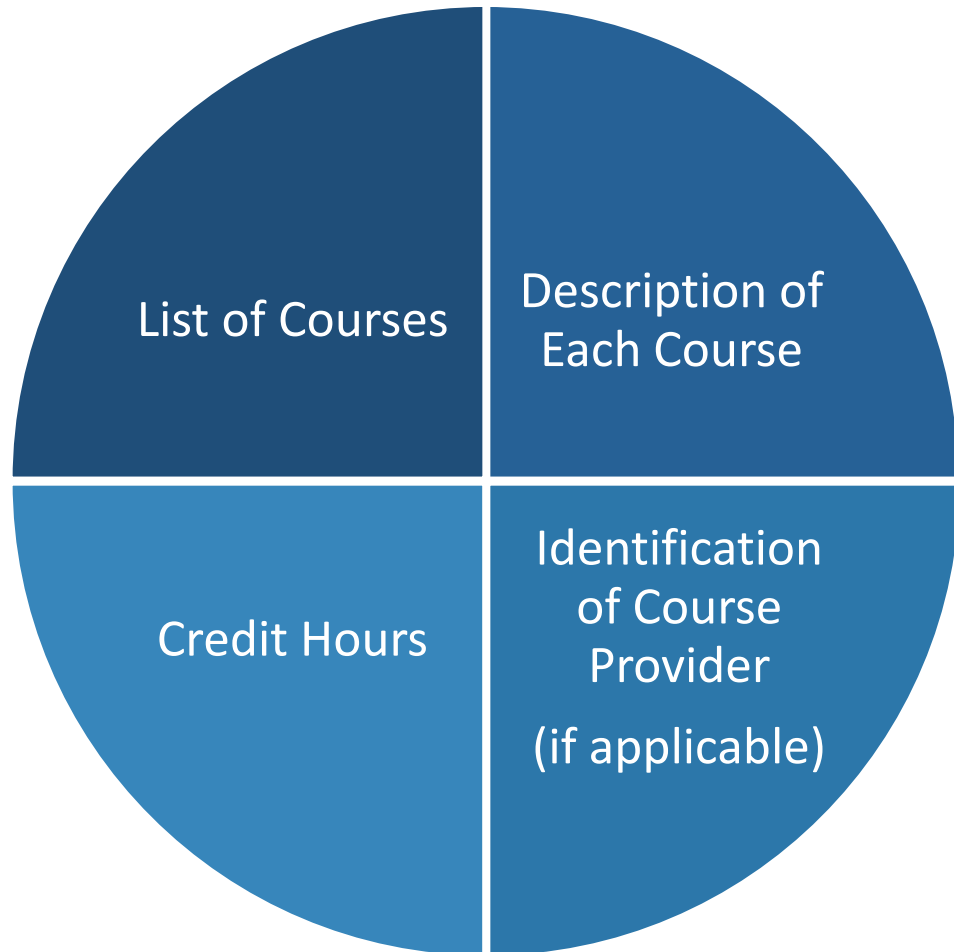
CORRECTION Regarding Blended Learning Courses

- During the various office hours hosted by the School Auditing Office, the Office verbally provided information that did not accurately reflect the definition of blended learning courses as outlined in the updated Rules for the Administration of the Public School Finance Act (1 CCR 301-39, rule 1.01(2))

*Blended learning courses are 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 (with some element of student control over the time and place of participation).*

- As such, a blended-learning course must have some direct instruction occurring regularly **in-person and on-site**.
- A course in which the direct instruction is occurring **synchronously in the same virtual classroom** does not qualify as a blended learning course. (It might meet the definition of a supplemental online course, if the criteria for that course type are met.)

- **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.
 - Optional Brick-and-Mortar Affidavit of Colorado Residency Sample form is now available on the School Auditing Office's [Pupil Count](#) webpage.
- **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.



- 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 four (4) requirements.
- This catalog must be posted on the School/district/BOCES website by the applicable count date.

- For purposes of the catalog of courses using alternative teacher-pupil instruction, **course provider** refers to the entity that creates (and, if applicable, from whom the district or school purchases) the **digital course content** for Blended Learning and Supplemental Online courses.
- If the district is purchasing digital course content from a third-party course content provider (such as CDLS, Edmentum, Edgenuity, etc.), the district must indicate this in their catalog of courses using alternative instruction.
- Further, the district must be prepared to provide evidence of payment for these courses (as applicable).
- If the district or school uses digital course content created by district or school staff for these course types, this should also be stated in the catalog.

- If districts/schools decide to incorporate this catalog within their existing district / school general course catalog, it is the district/school's responsibility to ensure that all required information is provided for all courses using alternative teacher-pupil instruction.
- For audit purposes, districts/schools should ensure that any linked documents incorporated into their catalog are saved and date specific.
 - For instance, if a district has a catalog of courses that use alternative instruction and that catalog links to a course listing found on a 3rd party course provider's website, the district should ensure that the course listing is date specific and saved for audit.

REMINDER: 1 CCR 301-39 2.05(1)(a)(I)

- An alternative teacher-pupil instruction courses may not be considered for funding purposes if the course is not included in the published catalog.
- Beginning with calendars adopted for the 2024-25 school year and each school year thereafter, districts shall publish a catalog of courses using alternative teacher-pupil instruction (as defined in these rules) for any such courses they intend to provide to secondary pupils that they would also like included as instructional time.
- The catalog must be published on the school/district/BOCES website by the applicable count date.

- To determine instructional time for courses that utilize only direct instruction (i.e., 100% in-person onsite courses), districts and schools will need to continue to conduct calendar and bell schedule calculations.
- **New:** Beginning with the 2024-2025 school year, calendar calculations will **no longer include** the additional 3 days that have historically been added to total student contact days for the year.
 - **Semester:** The total number of scheduled student contact days for the school year as documented by the district's adopted board calendar divided by two.
 - **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.



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**



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RECAP- Takeaway: 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 |



Updates since 5/30/24

Upcoming School Auditing Office Trainings

[Training and Office Hours](#) webpage

- Student October: What's New for Online Schools and Programs?- COMPLETE- recording is posted
- At-Risk Funding & CEP for Business Officials- COMPLETE- recording is posted
- Student October: What's New for AEC's? – COMPLETE- recording is posted
- Student October: What's New for Program & Curriculum Leaders? COMPLETE- recording is posted
- Student October: Intro to the Audit Resource Guide 7/16/24
- Student October: Calendar & Bell Schedules Calculations 7/18/24
- Preparing for the New Annual Audit Review 7/23/24
- Student October: What's New for (Pupil Count) Audit Contacts? 7/30/24
- At-Risk Count Audit Overview 8/8/24
- English Language Learning Count Audit Overview 9/17/24
- Duplicate Count Office Hours (follow up to Data Pipeline: Duplicate Count Process and Submission Training) 11/5/24

New - Document 1: District Level Documentation

Implementation Plan*:

A plan developed and maintained by a local school district that ensures every student and his/her parents or legal guardians have access to and assistance with the development of an ICAP, which has a **scope and sequence** that includes:

- district and school objectives,
- intentional district and school responsibilities,
- grade level appropriate timelines and
- key dates.

*As defined in 1 CCR 301-81

Updated- Document 2: Student-Level Documentation

Student-level documentation **or** evidence demonstrating that the student *reflected on the connection between their work-based learning course and their post-secondary workforce or education goals.*

This documentation/evidence should include, at a minimum:

- Student's name
- Term for which it applies (i.e., Fall 2024)
- The work-based learning course the student will be pursuing during the stated term/semester
- A reflective response (provided by the student) on how the work-based learning course connects to their postsecondary workforce or education goals
- Date that the reflection or connection was documented/evidenced by the student
 - For funding purposes, this reflection should occur on or before the pupil enrollment count date

- For the 2024/2025 school year, the district can determine how it will document that the student reflected on the connection between the WBL course and their postsecondary goals.
- Examples of how some districts have stated they will demonstrate this for the upcoming school year include:
 - Have students enrolled in WBL courses complete a survey that contains all of the required criteria
 - Include the required criteria in the district's WBL "contract" that is completed by the student
 - i.e., include questions about the connection between the course and the student's postsecondary goals in the contract

Note: Pending the outcome of the anticipated Notice of Rulemaking for 1 CCR 301-81, "Rules Governing Standards for Individual Career and Academic Plans," the documentation requirements listed on these slides are subject to change starting with the 2025-2026 school year.

Catalog of Courses Using Alternative Teacher-Pupil Instruction

- **Clarification:** Districts do NOT need (but may choose to have) unique course codes for the same course that offers different instructional modalities
 - Example: district can have one course code for Algebra 1 whether it's offered as direct instruction only, or also as supplemental online, etc.
 - If the course code is not unique, the district will need another way to identify which students are scheduled into each type of alternative instruction course
- **Clarification:** Regardless of the approach your district takes, ensure that all 4 criteria (as applicable) are met, and that they include all courses using alternative teacher-pupil instruction
 - i.e., the catalog does not need to specify which class is a given type, but RATHER indicate which courses have an alternative instruction option- supplemental online, blended learning, etc.
- These catalogs are likely to vary by district based on each individual district's existing catalogs and unique situations.
- As districts/BOCES develop their catalogs, our office would appreciate receiving examples.

UPDATE: Tracking Courses using Alternative Teacher-Pupil Instruction Courses for Reporting Purposes

Since our last office hours, the School Auditing Office has received the following feedback:

- **Work-based learning (WBL) courses:** Districts already have specific course codes associated with WBL courses. They plan on using these course codes to identify students scheduled into WBL courses for reporting purposes.
- **Blended learning and supplemental online courses:**
 - Creating placeholder “periods” in the student schedule that will be used only to list blended learning or supplemental online courses (example- period 10 would list only supplemental online courses, etc.)
 - Creating unique course sections within the district’s SIS that would be used to identify blended learning or supplemental courses.
 - If supplemental online courses are offered through the district’s online school or program, the district will use the student’s secondary enrollment to assist them in identifying which brick-and-mortar students are enrolled in these course types for reporting purposes.
 - Some districts have different course codes for their online schools or programs (compared to their brick-and-mortar course codes)- if they are only using these for supplemental online courses, they plan on using those course codes for reporting purposes.

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.

Here... or Coming Soon!
(Forms and Processes)

Required Forms- Coming Soon!!!

- **Updated:** Detention Center Notification- Form AUD 101
 - Substantive change: student must have attended in the 30 calendar days preceding the pupil enrollment count date in order to be considered for funding by the district of residence
- **New:** Annual Assurances for Statutory Compliance for Contracted Services
 - Will not be required for contractual agreements with another Colorado public school district or school, BOCES or institution of higher education (IHE)/ college
- **New:** Confirmation of Part-Time Funding Eligibility form
 - This form will be the only student-level document that will be provided with the Pupil Count Questionnaire- more information coming soon!
- **New:** Annual Audit Review Questionnaires (x3)
 - Pupil Count Questionnaire
 - At-Risk Count Questionnaire
 - English Language Learner Count Questionnaire

- Available NOW (**updated**): [Instructions for Applying for an Alternative Count Date](https://www.cde.state.co.us/cdefinance/alternative_count_date_instructions)
 - https://www.cde.state.co.us/cdefinance/alternative_count_date_instructions
- Available NOW (**new**): [Brick-and-Mortar Affidavit of Colorado Residency](https://www.cde.state.co.us/cdefinance/affidavit_of_residency_for_brick_and_mortar_with_instructions)
 - https://www.cde.state.co.us/cdefinance/affidavit_of_residency_for_brick_and_mortar_with_instructions
- Coming Soon: Alternative Attendance Documentation Request
 - This option is only available for independent study courses
- Coming Soon: Out-of-State Transfer (sample form)

School Auditing Office

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

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Questions?