



COLORADO
Department of Education

Addendum to the 2020 Student October Count Audit Resource Guide

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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Tracked Changes

This Addendum was originally published July 8, 2020. The list below summarizes dates and descriptions of subsequent revisions. Changes new to the most recent version of the Addendum have been highlighted in yellow throughout the text.

August 21, 2020: Version 3 of the Addendum was updated to include the following items:

- Guidance for Districts and Schools Using Support from [Colorado Empowered Learning \(CEL\)](#), including the use of online courses provided by [Colorado Digital Learning Solutions \(CDLS\)](#)
- [Electronic Signatures](#)
 - Provides clarification regarding electronic signatures for Family Economic Data Survey (FEDS) forms and Affidavit of Residency forms.
- [Passing Periods](#)
 - Clarification regarding length of passing periods used in the determination for funding.

July 30, 2020: Version 2 of the Addendum was updated to include the following items:

- [Delayed Start to School Year Clarification](#) section added
- [Enrollment Clarification Regarding Remote Learning](#) section added
- [Facility Schools](#) section added
- [Free and Reduced-Price Lunch \(reporting\)](#)
 - Link to the School Nutrition Unit's Back to School planning website added
- [Online Schools and Programs](#)
 - Clarification regarding supplemental courses offered through a district's existing online school or program
- [Preschool Students](#)
 - Updated link provided
- [Remote Learning \(temporary online programs\)](#)
 - Question and Answer 5 amended
 - Question and Answer 8 added
- [Retained Kindergarten Students](#)
- [Topic Clarification](#)
 - Question and Answer Topics were combined with informational items in the Student October Count Funding and Audit section



Purpose of this Addendum

This Addendum addresses specific requirements and considerations associated with the implementation of [remote learning](#) as a result of public health and safety measures as they pertain to the 2020 Student October Count data collection (specifically, funding and audit documentation requirements for the inclusion of remote learning). The basis for these requirements and consideration comes from CDE's Policy on Instructional Time and Student Attendance for the 2020-21 Academic Year ("[CDE Policy](#)").

The information contained in this Addendum is meant to supplement the information presented in the Student October Count Audit Resource Guide for 2020. **Therefore, districts should ensure that all students submitted for funding in the 2020 Student October Count data collection meet the funding (and audit documentation) requirements as outlined in the Audit Resource Guide.**

- If remote learning is implemented for the reasons described in the CDE Policy during the 2020-21 school year and allowed for by [adopted local policy](#), the district should refer to the CDE Policy and this Addendum for additional requirements and considerations.

The Addendum will be updated throughout the summer of 2020. Any additions or changes after the initial posting of this Addendum will be noted in the [Tracked Changes](#) section above, as applicable.



Definitions of Terms Used in the Addendum

For the purposes of this Addendum, the following terms will be used as described below:

Adopted local policy

Local board policy, regulations, and/or governance documentation that is adopted specifically to address the implementation of remote learning during the 2020-21 academic year in response to the COVID-19 pandemic. This adopted local policy should include the following information:

- Definition of “educational process” that includes the use of remote learning;
- Description of how and when remote learning may be used or implemented, including instances when in-person learning is available (in whole or part);
- Description of how instruction will be delivered during remote learning; and
 - This includes activities that would demonstrate a student is “engaged in the educational process” as described in the adopted local board policy.
- Description of what constitutes “present” during remote learning days (i.e., how the district will take and confirm attendance during remote learning days).
 - If the district is able to track daily attendance within the district’s student information system (to include both in-person and remote learning), the School Auditing Office will accept the SIS attendance at face value (as long as the above policy documentation is also provided).
 - If the district is unable to incorporate in-person and remote learning attendance within one system, and the student does not meet the attendance requirements for funding via in-person instruction only, then the district can provide other forms of attendance (as described in its local board policy, regulations, governance documentation, etc.) to demonstrate this requirement has been met.

Audit Resource Guide

Refers to the 2020 Student October Count Audit Resource Guide posted to the School Auditing Office’s Pupil Count webpage: http://www.cde.state.co.us/cdefinance/auditunit_pupilcount. This Guide has been developed to conform to state statute and the Code of Colorado Regulations (Administrative Rules) and contains all funding and audit documentation requirements. The Audit Resource Guide does not specify CDE policy related to remote learning in response to public health and safety measures associated with the COVID-19 pandemic.

CDE Policy

CDE has developed policy for the 2020-21 academic year in order to maximize flexibilities for districts in school schedules and attendance policies as needed to provide instruction during the COVID-19 pandemic, while still meeting the larger policy goals of allocating funding consistently and equitably and continuing to monitor student engagement during these times. This policy is called the “[CDE Policy on Instructional Time and Student Attendance for the 2020-21 Academic Year](#).” For additional information, please visit the [CDE Policy FAQ](#).

Hybrid Learning

“Hybrid learning” refers to traditional educational settings (i.e., brick-and-mortar schools) that are implementing a combination of both in-person and remote learning at the student level because of public health and safety measures associated with the COVID-19 pandemic. This includes, but is not limited to, students who are



scheduled to receive both in-person and remote learning instruction based on an alternating schedule (i.e., A and B days, A and B weeks, etc.).

Online Schools and Programs

“Online schools and programs” refer to those schools and programs that offer full-time online education programs and are authorized by a Colorado school district, BOCES, or the Charter School Institute (all of which are accredited by the State Board of Education). Further, these schools and programs have undergone the application and review processes and have received a notification of approval from the CDE Office of Blended and Online Learning. These approved online schools and programs are subject to all applicable state statutes and administrative rules. A list of approved online schools and programs can be found at the following link: <http://www.cde.state.co.us/onlinelearning/schools>.

Remote Learning

“Remote learning” refers to teacher-pupil instruction and contact time that would normally occur in-person (on-site), but because of public health and safety measures associated with the COVID-19 pandemic, is occurring remotely (off-site) during the 2020-21 school year. For this purpose, “remote learning” may be used in the determination for funding during the 2020 Student October Count data submission if the district has an [adopted local policy](#).

For purposes of this Addendum, the following is true:

- Remote learning does not refer to students who are enrolled and participating in an approved online school or program (as described in the “[Online Schools and Programs](#)” section of the 2020 Student October Count Audit Resource Guide).
 - Remote learning may include instances where the district’s definition of remote learning includes supplemental courses being offered by the district’s existing online school(s) or program(s) (see “Guidance for Online Schools and Programs Providing Remote Learning Options for the 2020-21 Academic Year”)
- Remote learning does not include Blended Learning courses (as described in the “[Blended Learning Courses](#)” section of the 2020 Student October Count Audit Resource Guide).
- Remote learning does not include Supplemental Online Courses (as described in the “[Supplemental Online Courses](#)” section of the 2020 Student October Count Audit Resource Guide).

Remote learning can occur in a variety of ways including, but not limited to:

- On an “as needed” basis when in-person instruction is suspended due to outbreaks, governor’s executive order, etc.;
 - This includes situations where in-person instruction is temporarily suspended for an entire classroom, school, district, or individual student who is unable to attend in-person instruction due to illness, being required to quarantine, etc.
- Simultaneously with in-person instruction at the student level (see “hybrid learning” above); and/or
- 100% of the time, when the district has provided the opportunity to families who, because of public health and safety measures associated with the COVID-19 pandemic, do not want their student(s) to receive in-person learning for the entirety of the Fall 2020 term and/or 2020-21 academic year



Remote learning is not limited to “online learning” only. Each district will have the flexibility to define activities that would demonstrate a student is “engaged in the educational process.” For example, this may include, but is not limited to:

- Completing educational paper packets;
- Logging in to an online platform to access digital content;
- Accessing assignments through Google Classroom;
- Watching or participating in live Google Hangouts, Zoom meetings, etc.;
- Watching prerecorded instructional videos

For additional information related to Remote Learning Guidance and Supports for the 2020-21 school year, please visit the following webpages:

- <http://www.cde.state.co.us/onlinelearning/remotelearningsupports>
- <http://www.cde.state.co.us/onlinelearning/guidance202021schoolyear>



Delayed Start to School Year Clarification

Calendar

In the event a district is delaying the start of the school year such that the actual first day of school is not the same as what is stated on the district's adopted calendar for the 2020/2021 school year, the district should refer to its locally adopted policies for guidance.

- Key policies for districts to consider are EBCE and IC/ICA (using CASB nomenclature). These policies will be aligned with C.R.S. 22-32-109 (1) (n) (B)...“Any change in the calendar, excluding changes resulting from emergency closings or other unforeseen circumstances, shall be preceded by adequate and timely notice from the board, district administration, or school administration of not less than thirty days.”
- Within the district's respective local policies, if the district classifies the delay as an emergency closure or unforeseen circumstances, it is likely the district will have a clause that the local board would ratify the administration's decision at their next board meeting.
- Districts do not need permission from CDE to close school or to change their calendars. If a district has already provided its calendar information to CDE through the Data Pipeline Directory for the 2020-21 school year prior to the delay being announced, the district does not need to update the Directory.

School Days and Instructional Hours Requirements

As is true with any changes to the total student contact days or instructional minutes per day for any reason, districts must ensure that all schools within the district continue to meet the minimum number of school days and instructional hours requirements. As such, if a delayed start is implemented, the district must ensure that the following requirements are still being met by all schools.

- **School Days:** provide for at least 160 student contact days (unless the district has a waiver)
- **Instructional Hours:** provide for the required minimum teacher-pupil instructional hours
 - Secondary schools: 1,080/1,056 hours
 - Elementary schools: 990/968 hours
 - Half-day Kindergarten: 450/435 hours
 - Full-day Kindergarten: 900/870 hours
 - Colorado Preschool Program: 360/351 hours

If a school or district is not in compliance with the school days or instructional hours requirement listed above, and is unable to come back into compliance before the end of the school year, then the district must contact CDE for a waiver consideration. Please note that waivers will not be considered unless the district is able to show it made a good faith effort to come into compliance with these requirements.

- As described in the [CDE Policy](#), in instances where districts are unable to meet the instructional hour and teacher pupil contact requirements through in-person instruction, the district will be considered in compliance if they make a “good faith effort” to ensure that whatever combination of in-person and/or remote learning they implement during the year allows students to learn the same academic content as they would have learned under the in-person bell schedule. When calculating hours of remote learning for the purposes of determining teacher-pupil contact and teacher-pupil instruction, districts may base their calculation on academic content covered, student demonstrations of learning, estimated times for students to complete independent work, and/or other methods identified by the district to compare in-person learning to remote learning.
 - In this context, a good faith effort to provide a quality education for all students, including vulnerable populations, may be based on local facts and circumstances. Indicators of good faith include clearly communicating expectations for staff and families, dedicating resources and



supports to implement the district's educational process, creating opportunities and access for students with the greatest needs, providing as much instruction and student support as possible through the end of the calendar year, and implementing a method for measuring gaps in student learning. In demonstrating good faith effort, districts should keep in mind that all applicable federal laws for services for students with disabilities and English language learners are still in effect and should be considered when developing plans for remote learning and the district's definition of educational process.

Funding Consideration for 100% In-Person Learning Option

From a funding perspective, if a district adjusts its total student contact days prior to the first scheduled school day (i.e., delayed start in which additional days are not added back into the calendar) such that the total days vary from the district's adopted calendar, the district will need to update its calendar calculations (for 100% in-person learning) to determine the average number of instructional minutes per day a student must be scheduled in order to meet the in-person part-time or full-time funding thresholds for the 2020-21 school year. The adjusted calendar calculation, along with the in-person bell schedule calculations for a given school, should be used to evaluate individual student schedules to determine part-time or full-time funding eligibility for the 2020 Student October Count data submission.

Funding Consideration for Remote Learning Option (Equivalent Instructional Hours)

In situation where a district implements remote learning (hybrid or 100%) as a result of public health and safety measures due to the COVID-19 pandemic during the 2020-21 school year, the district should:

- Use the 2020-21 bell schedule calculation for the 100% in-person learning option for a given school to determine a reasonable equivalency of instructional hours occurring during remote learning (hybrid or 100% remote). In the event a district school is not offering a 100% in-person learning option during the 2020-21 school year, then:
 - School districts can rely upon the calendar and bell schedule calculations from the 2019-20 school year to determine full-time and part-time requirements for the 2020-21 school year for a given school. For example, if five secondary classes were necessary for full-time funding and two classes were necessary for part-time funding during the 2019 Student October Count for a given school, the same requirements can be applied to the 2020-21 school year for that same school.

For additional information on calendar and bell schedule calculations, please refer to Appendix C of the Audit Resource Guide (http://www.cde.state.co.us/cdefinance/2020_student_october_resource_guide).



2020 Student October Count Funding and Audit

In order to include remote learning in the determination for funding for any student during the 2020-21 school year, districts will be required to submit a copy of the [adopted local policy](#) at the time of audit. In addition to the funding and audit documentation requirements described in the 2020 Student October Count Audit Resource Guide, the adopted local policy will be the [only supplemental audit documentation](#) needed in order to include remote learning in the determination for funding during the 2020-21 school year.

Because of the challenges presented by the COVID-19 pandemic, all districts are encouraged to adopt local policy prior to the start of the 2020-21 school year, even if remote learning is not anticipated at the start of the school year. This will provide the district the flexibility needed to include remote learning in the determination for funding if such learning becomes necessary or required. This includes situations where in-person instruction is suspended for any length of time (and remote learning is implemented) during the semester of the pupil enrollment date. Further, if districts begin the school year with a [hybrid learning](#) model of instruction that includes both in-person and remote learning, or if districts provide families the option to select 100% remote learning during the Fall 2020 semester, adopted local policy **will be required**.

Further considerations:

- All funding and audit documentation requirements outlined in the 2020 Student October Count Audit Resource Guide will apply to the 2020-21 academic year.
- The School Auditing Office will be using the adopted local policy regarding remote learning to guide the audit process for each district (including charter schools and any contracted educational entity). Therefore, it is imperative that such policy be adopted prior to the implementation of remote learning by the district (i.e., the first day of remote learning), and available at the time of audit.
 - **Failure to have adopted local policy in place may impact a district's funding if remote learning is used in any capacity as described in the [CDE Policy](#) and adopted local policy during the semester of the pupil enrollment count date.**
- The adopted local policy will guide the type of documentation a district may provide during the funded pupil count audit in order to evidence that students have met funding requirements. Examples of this include, but are not limited to:
 - Acceptable documentation evidencing attendance (if remote learning attendance is not tracked within the district's student information system)
 - An equivalent bell schedule for teacher-pupil instruction and contact time occurring during remote learning (if different from in-person instructional time)
 - Individual student schedules (if not generated from the district's student information system)
- If the district has charter schools that do not follow the district's adopted local policies regarding remote learning, the district will also need to provide the adopted local policies for the charter schools if remote learning is used during the semester of the pupil enrollment count date.
- If the district contracts with providers to educate its students, districts should consult with their contract providers to determine how the provider's services fit into the district's definition of the educational process and plans for remote learning. Districts are responsible for ensuring that the contract providers employ practices and procedures that align with the district's adopted local policies.



- Districts should be able to differentiate between students participating in remote learning from those that are enrolled and participating in a district’s online school and program.
 - Funding and audit documentation requirements for online schools and program will not apply to students engaged in remote learning as defined at the beginning of this Addendum and described in adopted local policy, unless the district’s adopted local policy states that remote learning will include supplemental online courses offered through the district’s acknowledged online school or program.
 - In such cases when brick and mortar students are scheduled into supplemental online courses offered by the district’s online school or program as a remote learning option per adopted local policy, said courses will be evaluated using the acknowledged online school or program’s equivalent bell schedule. Further, attendance for remote learners scheduled into supplemental online courses through an online school or program can be documented per the district’s adopted local policy or the Authorizer’s Assurances for the online school or program.
 - Brick and mortar students who are scheduled into supplemental online courses as a result of the district’s remote learning option (per adopted local policy) should be reported at their brick and mortar school during the 2020 Student October Count data collection, with the corresponding funding code (i.e., NOT an online funding code of 91, 92, 94, 95).
 - Students enrolled and participating in approved or acknowledged online schools and programs will be held to all requirements set forth by state statute and administrative rule.
 - Please refer to the “[Online Schools and Programs](#)” section of the 2020 Student October Count Audit Resource Guide for more information and funding and audit documentation requirements.
 - Visit the following URL for a list of approved online schools and programs:
<http://www.cde.state.co.us/onlinelearning/schools>



Topic Clarification

As outlined in the 2020 Student October Count Audit Resource Guide, all students submitted for funding must meet the enrollment, attendance, and scheduled hours requirements. In some instances, unique student, courses, schools, and program types may have additional audit considerations associated with funding eligibility and/or audit documentation. Below is additional information about each as it relates to remote learning due to public health and safety measures presented by the COVID-19 pandemic for the 2020-21 academic year.

Attendance

The following questions and answers are meant to provide clarification relevant to remote learning used in the determination for funding during the 2020 Student October Count data collection and subsequent funded pupil count audit.

Q1: If our district implements remote or hybrid learning in the fall, what kind of attendance is acceptable?

A1: Acceptable attendance will be determined by each individual district's adopted local policy which should include a description of how the district will take attendance (i.e., mark a student as present) during remote learning days.

- If the district enters attendance for remote learning days in its student information system based upon acceptable ways in which attendance can be confirmed per the adopted local policy, the district can provide attendance reports generated from its student information system for audit purposes.
- Otherwise, the district can provide alternative documents (described in the adopted local policy) to evidence attendance for audit purposes. Examples include, but are not limited to: log-ins into Schoology or Google classroom, attending a Google Hangout or Zoom session, submitting dated hardcopy work papers or assignments, etc.

Q2: If an online platform is used for remote learning, is there a time frame that a student has to be logged-in in order to be counted as present?

A2: No, there is not a requirement as to how long a student must be logged-in in order to be counted as present during a remote learning day, unless the adopted local policy prescribes such a requirement.

Q3: Can we take attendance once daily or weekly based on participation?

A3: As outline in the CDE policy, districts are expected to record attendance (at a minimum) once daily during remote learning days. This includes all grade levels. For example, districts will not be required to track period attendance during remote learning days for secondary students (i.e., students in grades 6-12).

Q4: Are pupil attendance codes or other codes affected by these scenarios?

A4: CDE policy provides flexibilities regarding how districts define and document attendance. However, districts will need to ensure that they have processes in place that will allow them to report attendance information for the spring 2021 Attendance Snapshot data collection.

- Some student information systems may have flexibilities that allow districts to note how attendance was verified for a student for a given school day.



Q5: Will there be guidance on how districts can report attendance from multiple systems in an efficient manner prior to audit?

A5: Districts will define (through adopted local policy) what will constitute positive attendance, and how they will document attendance during remote learning.

Q6: Can we use completed assignments to evidence participation during remote learning days?

A6: If the district's adopted local policy states that a student will be deemed present on dates when completed assignment are submitted during remote learning day, then yes.

Q7: Can we use enrollment lines with start dates for attendance?

A7: Dates of enrollment do not evidence attendance. Students must be participating in activities that show that they are engaged in the educational process, as described in adopted local policy, in order to be considered present.

Q8: If students are given packets of work because they can't get online for remote learning, can we use the date on the worksheets as attendance for that day?

A8: Dates on worksheets may be used as evidence of attendance during remote learning days if the district's adopted local policy includes packet work as an activity that shows the student is engaged in the educational process, and that dated and completed packet work will be one way in which attendance will be taken.

Colorado Empowered Learning (CEL)/Colorado Digital Learning Solutions (CDLS)

For districts that are providing CEL/CDLS courses to their students as part of their 100% remote learning option in response to the COVID-19 pandemic, CDE has provided clarification, guidance, and considerations which can be found at the following location: <http://www.cde.state.co.us/onlinelearning/guidanceoncel>. The text from this webpage is also provided below.

Overview

Due to the COVID-19 pandemic, many districts and schools are providing a remote option for students that leverages support from online providers. Utilizing the current statewide supplemental online and blended learning program commonly known as Colorado Empowered Learning (CEL) is one remote option. CEL is an initiative that provides supplemental online courses to schools and districts at a subsidized cost. CEL has recently been able to expand access to affordable programming through support from the Governor's Emergency Education Reserve Fund (GEER Fund) of the CARES Act.¹ This page provides considerations and information about responsibilities that a district/school should be aware of when utilizing online courses through CEL.²



Context

For the 2020-21 school year only, districts and schools that utilize online courses through Colorado Empowered Learning have been offered three options to choose from as outlined below:

- **Option 1** involves the use of an online asynchronous course that includes support by a teacher provided by CDLS. This option is most similar to the supplemental online course offering model that existed prior to the COVID-19 pandemic.
- **Option 2** involves similar offerings to Option 1 but a district/school-based teacher would oversee the classroom and receive support from a CDLS teacher. A local teacher would therefore stay actively engaged in teacher-pupil interaction.
- **Option 3** involves access to a learning management system with grade level content so that district/school-based teachers would have access to digital learning structures and resources as they plan for remote learning. This option, like Option 2, utilizes the local teacher to drive teacher-pupil interaction.

Regardless of the option that a district or school selects, due diligence must be taken to ensure that requirements related to funding, instructional hours, instruction of special student populations, accountability, and others are being met. For options 2 and 3, many of these requirements will be more closely accounted for because of the regular, local teacher-pupil interaction. For all options however, all applicable legal responsibilities remain with the school/district and do not become the responsibility of Colorado Empowered Learning.

Requirements & Accountability for Students

Given that CDLS is a provider and is not a school, the performance data for students who are enrolled in online courses through CDLS will be attributed to their school of enrollment for 2021 state performance frameworks and federal accountability. Performance data attributed to the school includes all state assessment achievement and growth data, as well as graduation, dropout, matriculation, and all other relevant attendance and performance outcome data. If the school is assigned a multi-year framework report, then these students' data will be included in the 2021, 2022, and 2023 performance frameworks and federal accountability. The district is responsible for understanding the relationship of these students to the accountability of their enrolled school and the request to reconsider process cannot be used to adjust the 2021 ratings or accountability clock status as a result of any of the online course options selected.

The district and school also retain the responsibility to ensure that instructional programs meet the needs of students with IEPs and English Learners. This includes ensuring that instruction is aligned with Colorado Academic Standards and Colorado English Language Proficiency Standards and that online educators meet state and federal educator licensure and qualification requirements - particularly for educators working with students with disabilities or English Learners (ELs). Please see district/school obligations in providing services for ELs.

Student October Count & Funding



Students who are provided remote learning through Colorado Empowered Learning will be evaluated for funding as outlined in the [2020 Student October Count Audit Resource Guide](#). (Please see pages 1-15 for information about general funding requirements, as well as the “Contractual Education Students” section.)

This document, the Addendum to the Audit Resource Guide, provides more detail on the various requirements that districts need to have in place for remote learning and to have remote learning count in the determination for funding. These requirements include having “adopted local policy” (as defined in the Addendum) which addresses the following:

- Definition of educational process that includes remote learning
- Description of how and when remote learning will be used, including how instruction will be delivered and activities that would demonstrate a student is “engaged in the educational process”
- Description of how attendance will be taken during remote learning
- Either a statement of bell schedule equivalency in line with the district’s policy for teacher-pupil instruction and contact time, or how the school/district will determine the equivalent amount of teacher-pupil instruction and contact time associated with the remote learning being delivered

Please note that the requirements for identifying teacher-pupil instruction and contact time is something that needs to be clearly identified by the school or district. Many guidelines related to screen-time (including those that have been circulated by CDLS) do not adequately address these requirements, so specificity for how time will be met is important to delineate at the school or district level. Additional guidance is provided below:

- Use of an “hours conversion” to calculate equivalent instructional hours is not allowed for remote learning (for example, “6 hours of in-person instruction equals 2 hours of online instruction”)
- Remote learning is not limited to just online learning activities. It includes any activities that demonstrate a student is engaged in the educational process as defined by the local board. This includes, but is not limited to hands-on projects, educational (worksheet) packets, movement activities, etc.
- If districts are concerned about limiting screen time (especially for younger students), then they will need to consider providing a combination of online and off-line activities to ensure that the instructional material and content being covered is equivalent to what would be covered during in-person learning. If the same content and instructional material is covered, then it would be appropriate to use the in-person instructional hours as a basis for the equivalency.
 - Example:
 - Consider a “normal” day for a 2nd grader that includes the following types of “subject” or “content” areas and approximate amount of time throughout the day totaling 330 minutes (per day) of in-person instruction.
 - Circle time- 20 minutes (review date, months, seasons, etc.)
 - Math- 45 minutes
 - Reading- 60 minutes
 - Writing- 60 minutes
 - Science- 30 minutes
 - Social Studies – 30 minutes

- Life skills- 25 minutes
- PE- 30 minutes
- Music 30 minutes
- When developing an equivalency of activities to cover the same amount of material and content during remote learning, the district determines how best to provide this instruction
 - The district chooses to use Colorado Empowered Learning courses to cover math, reading and writing, but not the other subject/content areas
 - The district determines how best to cover these other content/subject areas through off-line activities (such as hands-on projects, educational (worksheet) packets, movement activities, etc.)
- Please note that if online course offerings are less than what would normally be covered during in-person instruction, the student may not be eligible for full-time funding.

Elementary Grade Level Considerations

For early elementary grade levels (K-3), districts and schools should be aware that they, not CEL/CDLS, are responsible for meeting all READ Act requirements including, but not limited to administering READ Act assessments and progress monitoring.

Districts/schools cannot use READ Act funding for the purchase of online courses through CEL/CDLS.

Districts and schools should understand that they, not CEL/CDLS, are also responsible for any school readiness assessment requirements for students in Kindergarten.

Be aware that CEL/CDLS provided a communication outlining that their elementary courseware is designed “so that synchronous or real-time instruction is not required.” It is important to note that although CDLS curriculum may be designed in such a way, it ultimately highlights the importance of districts or schools needing to make plans for what teacher-pupil interaction will be for students over the course of the semester and year.

The district or school is responsible for ensuring that online courses meet the needs of elementary aged students. This would include considering opportunities to ensure wellness and connection and establishing a remote learning environment that sustains connectedness to the student’s home school community.

Footnotes:

1. The provider for these online courses is Colorado Digital Learning Solutions (CDLS)
2. Please note that what is presented in CDLS’s “Option 1” is modeled after their original program that was delivered to students who were mostly receiving instruction in a secondary level brick and mortar setting and took one or a limited number of supplemental classes online while staying in an environment overseen by a local educator. As such, districts that use Option 1 will require schools/districts to consistently engage in the learning plans/progressions of students

Contractual Education Students

Districts should consult with their contract providers to determine how the provider’s services fit into the district’s definition of the educational process and plans for remote learning. Districts are responsible for



ensuring that providers they contract with employ practices and procedures that align with the district's adopted local policies.

Early Access (into Kindergarten or First Grade)

Determinations of eligibility for early access students must be made within 60 calendar days of the Administrative Unit (AU) receiving the child's portfolio. As of May 13, 2020, the state board of education has granted a statewide waiver of this timeline for the 2019-2020 school year. We are currently advising that evaluations that do not require in-person meetings, observations, or assessments may be conducted while schools are providing remote learning. Evaluations that require in-person contact would need to be delayed until in-person learning resumes or current guidance of the state/local health department allows such interactions. Communication of next steps and process adjustments should be made proactively with families of applicants. If needed as a result of extended AU closure, determinations can be made up until the beginning of next school year or September 1, 2020 as is standard practice for applications received after April 1st.

For more information, please visit the CDE Gifted Education and COVID-19 Guidance webpage:

<https://www.cde.state.co.us/gt/gecovid19guidance>

Electronic Signatures

For the 2020-21 school year, districts may collect the **Family Economic Data Survey (FEDS)** form and **Affidavit of Colorado Residency** in electronic format to include electronic signatures:

- Forms can be completed through a secure system in which the parent/guardian is able to log into their individual account (such as a parent portal, etc.), complete the form, provide an electronic signature, and submit.
- If an electronic signature cannot be collected through a secure system (as described above), then the district can accept a scanned, faxed, or emailed copy of the completed form that contains a "wet signature."
 - For example, the parent/guardian can complete the hard copy form to include a signature and date, then scan or take a picture and email it (or fax a copy) to the district or school for processing.
- In the event district/school staff are assisting families in completing these documents electronically, but not through a parent/guardian's individual account in a secure system, then the district/school should have a process by which the parent/guardian reviews all information to ensure accuracy and completeness, and then provides a "wet signature" and date confirming all information is correct and accurate.
 - For example, once all information has been entered into the system by the district/school staff, a summary report containing this information could be generated in hard copy format, provided to the parent/guardian for review, and then signed/dated by the parent/guardian confirming all information contained within the summary is accurate and complete.

Enrollment (Clarification) Regarding Remote Learning

If a district (or school) has a student who is continuing from the 19/20 school year into the 20/21 school year, and the student's parent/guardian has opted to enroll their student in the 100% remote learning option being provided by the district (or school) as a result of public health and safety measures implemented as a result of the COVID-19 pandemic, the School Auditing Office will not be verifying the location from which a student is completing the remote learning (i.e., within or outside of Colorado). However, if the student is not completing



remote learning from Colorado, the student must continue to be a resident of Colorado in order to be eligible for funding during the 2020-21 school year.

Facility Schools

The Office of Facility Schools is encouraging facility schools (especially day treatment facilities) to develop plans that will outline how remote learning will be facilitated, if needed, during the 2020-21 academic year. (This includes describing how instruction will be delivered, and what will constitute attendance during remote learning days).

- Districts contracting with facility schools are encouraged to review the facility school plans to ensure that services and instruction being provided appear appropriate in the event of remote learning.
- If districts place students at an approved facility school and submit the student for funding in Student October, the district will be required to provide all audit documentation as described in the Audit Resource Guide
- For more information: <http://www.cde.state.co.us/facilityschools>

First Grade Students (Under the Age of 6)

Beginning with the 2020-21 school year, statute no longer requires first grade students to be at least 6 years old as of 10/1 in order to be eligible for full-time funding.

- Therefore, additional audit documentation is no longer needed to demonstrate full-time funding eligibility as long as the first grader is at least 5 years old as of 10/1.
- Please refer to the First Grade Students (Under the Age of 6) section of the Audit Resource Guide for more information.

Free and Reduced-Priced Lunch (reporting)

For additional regarding Applications for Free and Reduced-Price School Meals, please contact: Free&ReducedPriceSchoolMeals@cde.state.co.us

The following questions and answers are meant to provide clarification relevant to remote learning used in the determination for funding during the 2020 Student October Count data collection and subsequent funded pupil count audit.

Q1: During hybrid and remote learning, there may be barriers to families in submitting Applications for Free and Reduced-Price Meals and Family Economic Data Survey (FEDS) forms. Will CDE be providing any additional flexibilities for the 2020-21 school year?

A1: For the 2020-21 school year, no flexibilities will be provided related the identification and reporting of free and reduced-priced lunch eligibility during the Student October Count data collection beyond what is normally afforded.

- Please refer to the At-Risk/Free Lunch Audit Resource Guide for additional information (http://www.cde.state.co.us/cdefinance/auditunit_atrisk_freeandreduced)
 - In the absence of current year documentation received on or before the pupil enrollment count date, the district may use prior year documentation to evidence lunch status if the pupil enrollment count date falls within the first 30 school days or if the district has requested and received a variance waiver.



Q2: If students are provided 100% remote learning while being enrolled in their brick and mortar school, can the district still distribute and accept Applications for Free and Reduced-Price School Meals?

A2: If students are enrolled in a site/school participating in the National School Lunch Program, then the district can distribute, and encourage families to complete, the Application. If a student is not enrolled in a participating site/school, then the district can distribute, and encourage families to complete, the Family Economic Data Survey (FEDS) form.

Please visit the School Nutrition Unit's back to school planning website for general information:

<http://www.cde.state.co.us/nutrition/backtoplanning>.

Homeless Students

Please see the following link to the "COVID-19 FAQ: McKinney-Vento Education for Homeless Children and Youth Program": <http://www.cde.state.co.us/dropoutprevention/covid-faq-mckinney-vento>

Individualized Education Programs (IEPs)

For the 2020 Student October Count, in instances where the district will be providing an IEP to evidence a student has met one of the requirements for funding (such as special education preschool students, students 21 years old as of 10/1, transition students receiving 18-21 year old services, etc.), the IEP must be current (i.e., not more than 365 days old) and include services that encompass the pupil enrollment count date.

- No flexibilities, beyond what is described below, will be provided for during the 2020 Student October Count in situations where the IEP annual review does not occur within the normal timeframe.
 - If the IEP is overdue (i.e., more than 365 days old), but the district has a written agreement between the parent and school/district to extend the existing IEP, then the district should be prepared to provide the extended IEP and written agreement (to extend).
 - If the IEP being extended does not accurately reflect the services being provided to the student as of the pupil enrollment count date (10/1), the district must also provide an accurate schedule (along with the extended IEP and written agreement).
- For more information, please visit "Special Education & COVID-19 FAQs" which can be found at the following location: http://www.cde.state.co.us/cdesped/special_education_faqs
 - Refer to the "Individualized Education Program (IEP) Meetings" section.

Instructional Hours/School Days

The following questions and answers are meant to provide clarification relevant to remote learning used in the determination for funding during the 2020 Student October Count data collection and subsequent funded pupil count audit.

For more information regarding instructional hours, see the [School Days and Instructional Hours Requirements](#) section above.

Q1: How will instructional hours and attendance be determined with respect to contract services, including for preschool, educational services provided by BOCES, and Colorado Empowered Learning partnerships?

A1: Districts should consult with their contract providers to determine how the provider's services fit into the district's definition of the educational process and plans for remote learning. Districts are responsible for



ensuring that the contract providers employ practices and procedures that align with the district's adopted local policies.

Q2: With a remote and hybrid learning COVID schedule, schools may create and adjust schedules that may significantly differ, and/or require a four-day school week from their previously scheduled planned pupil instruction due to resource constraints, health requirements, and student needs. Will CDE waive the four-day school week application, as well as instructional hours requirements for the first semester due to the need for a district's or school's COVID instructional response?

A2: For the 2020-21 school year, CDE will not be providing a statewide waiver to either the school days or instructional hours requirements.

- Please refer to the CDE Policy which outlines flexibilities available to districts during the coming school year related to these requirements.
 - Student contact (school) days may include both in-person and remote learning days. If a district must suspend all instruction (both in-person and remote learning) for a specified time such that the total number of student contact days drops below 160 for the school year, the district should contact CDE for consideration of a waiver.
 - In instances where districts are unable to meet the instructional hours requirement through a combination of in-person and remote learning, the district will be considered in compliance if they make a good faith effort to ensure that whatever combination of in-person and/or remote learning they implement during the year allows teachers to cover the same academic content as they would have covered under the in-person bell schedule.

Lunch Periods

The following question and answer are meant to provide clarification relevant to remote learning used in the determination for funding during the 2020 Student October Count data collection and subsequent funded pupil count audit.

Q1: Can districts count lunch time if lunch occurs in the classroom with a learning activity?

A1: According to the State Board of Education's rules, lunch periods explicitly may not be counted as instructional or teacher-pupil contact hours. See 1 CCR 301-39, section 2.02(2)(b). However, where a district plans to incorporate learning activities into lunch periods, the district may identify the portion of that period that is attributable to student learning taking place and count that towards teacher-pupil instruction and contact hours. For example, if a 50-minute block of time is set aside for both lunch and math games, the district can only include the time set aside for the math games as instructional and included in the determination for funding.

Online Schools and Programs

Existing Online Schools and Programs Providing Remote Learning Options for the 2020-21 Academic Year

As a result of the COVID-19 pandemic, some families have expressed a desire to enroll their student(s) in a fully online option for 2020-21 but do not want to leave the school district or the brick and mortar school. The information below details how a district with an online school or program may support families in the choice to pursue a fully online option during the COVID-19 pandemic while remaining affiliated with the previous school



attended by utilizing the current structures in existing online schools and programs. This short-term solution is offered to provide options for families for the 2020-21 school year.

For the 2020-21 school year only, districts with online schools or programs may provide remote learning options for students within the district by utilizing the district online school or program as a response to public health and safety measures associated with the COVID-19 pandemic. Any student enrolled in a brick and mortar school that seeks to participate in a fully online remote learning option for the 2020-21 school year would remain enrolled in a district brick and mortar school. The student would be scheduled for a full schedule consisting of supplemental courses offered by the existing district online school or program. This also means that accountability for that student's learning will remain with the brick and mortar school and home district.

Requirements and Accountability for Students Participating in Online School or Program

Given that these students will remain enrolled in their brick and mortar school, the performance data from these students will be attributed to the brick and mortar school's 2021 state performance frameworks and federal accountability, including the methodology for identifying schools for support and improvement, equitable distribution of teachers, comparability, and other federal accountability measures. Performance data attributed to the brick and mortar school includes all state assessment achievement and growth data, as well as graduation, dropout, matriculation, and all other relevant attendance and performance outcome data. If the brick and mortar school is assigned a multi-year framework report, then these students' data will be included in the 2021, 2022, and 2023 performance frameworks and federal accountability. The data from these students will not be associated with any other school, including the online school or program where the student is participating in the supplemental online courses. The district is responsible for understanding the potential impacts of these students' enrollment at their home brick and mortar schools on accountability at the state and federal levels, just as districts are responsible for determining if the existing online school or program meets the instructional needs of participating students. The request to reconsider process cannot be used to adjust the 2021 performance framework ratings or accountability clock status (e.g., year on clock, on watch) as a result of this online instructional option. In other words, data from students receiving instruction from an online school or program (either single or multi-district) that maintain home status at a brick and mortar school will not be attributed to the online school retroactively or removed from the brick and mortar school's accountability determinations.

The brick and mortar school retains the responsibility to ensure that instructional programs meet the needs of students with IEPs and English language learners. This includes ensuring that instruction is aligned with Colorado Academic Standards and Colorado English Language Proficiency Standards and that online educators meet [state](#) and [federal](#) educator licensure and qualification requirements, particularly for educators working with students with disabilities or English learners (ELs). Please see district/school [obligations in providing services for ELs](#).

For any state and federal data collections, the students described in this guidance must be attributed to the brick and mortar school, not to the online school or program.

Student October Count and Funding

Students who select this remote learning option, would be evaluated for funding purposes with the same documentations as outlined on the district's current Authorizer Assurances that are on file with the Office of Blended and Online Learning and the online school or program's course equivalencies. However, brick and mortar student taking supplemental courses through an existing online school or program will not need Proof of Colorado Residency documentation as this requirement only pertains to students enrolled in the online school



or program. Students will be coded in the 2020 Student October Count data collection as attending the brick and mortar school (i.e., with the brick and mortar school code and applicable funding code) and not as an online student (i.e., not with an online school code and/or funding code). This Guidance would not apply to continuing online students who were enrolled in the district's existing online school or program during the 2019/2020 school year. These students would remain, and be reported as, online students and subject to all funding and audit documentation requirements as outlined in the "Online Schools and Programs" section of the Audit Resource Guide.

To utilize this remote learning option, the district must include a description of the use of supplemental courses provided by the district online school or program as a remote learning option in its definition of educational process as described in the "CDE Policy on Hours and Attendance for the 2020-21 Academic Year" and the "Addendum to the 2020 Student October Count Audit Resource Guide" (see "Adopted Local Policy").

Alternative Education Campuses

Note that online Alternative Education Campus (AEC) schools are not recommended as a remote learning option for students within the district attending traditional schools. AECs must certify that they serve a high-risk student body and that their methods of instruction are tailored to meet the needs of those high-risk students. Thus, enrolling traditional students in an online AEC is generally not appropriate, and other options for traditional students needing online instruction should be explored. If an online AEC enrolls or serves traditional district students, it may jeopardize the online school's eligibility to seek an Alternative Education Campus designation. Districts that only authorize an online program attached to an AEC should carefully consider their ability to provide appropriate instruction to both high-risk and traditional student populations and the potential implications for their on-going AEC designation.

For more information, please see the [2020-21 Guidance for Districts with Current Online School and Programs](#) webpage.

Passing Periods

During the 2020-21 school year, it is acceptable for schools to have up to 10-minute passing periods in order to accommodate social distancing in halls, handwashing, etc. If a school is considering implementing longer passing periods, please contact the School Auditing Office for clarification.

Postsecondary Courses (off-site at the IHE)

This includes postsecondary courses offered through ASCENT, Concurrent Enrollment, Dropout Recovery Programs, Early College and PTECH.

For the Fall 2020 semester, districts will be required to provide all audit documentation as outlined in the Audit Resource Guide in order to include these courses in the determination for funding (i.e., tuition payment and credit hour verification).

- Reminders:
 - Beginning with the 2019/2020 school year, districts are no longer required to provide attendance verification for any postsecondary courses used in the determination for funding.
 - Further, the mode of instructional delivery is not considered when determining funding eligibility as these postsecondary courses are evaluated based on the number of district-paid college credit hours during the semester of the pupil enrollment count date. Therefore, if any IHE shifts from in-person to remote learning (or vice versa) during the Fall 2020 term, this will



not impact how funding should be determined for these students. This is also true for 100% online postsecondary courses.

Preschool Students

For information about preschool service providers with whom the district contracts, please see “Contractual Education Students” above.

For program information related to preschool, please visit:

- <http://www.cde.state.co.us/early/opening2020-21#preschool>

Remote Learning (temporary online programs)

The following questions and answers are meant to provide clarification relevant to remote learning used in the determination for funding during the 2020 Student October Count data collection and subsequent funded pupil count audit.

Q1: If a district offers hybrid or 100% remote learning, will the district need to receive an online school or program designation?

A1: No. CDE has clarified that if schools and districts are planning remote programming intended to support students and families in response to COVID-19, they do not need to get formal approval as a designated online school or program.

Q2: If a district creates a temporary online program during the 2020-21 school year to provide remote learning during the COVID-19 pandemic, can they continue the program indefinitely?

A2: Districts that start a temporary online program as part of their remote learning options during COVID-19 as outlined in their local board policy, may continue that program after the 2020-21 school year. However, to continue operating an online school or program beyond the 2020-21 school year, the authorizer must apply for an online designation through the state’s online office.

- For more information: <http://www.cde.state.co.us/onlinelearning/guidance202021schoolyear>

Q3: For remote learning, what will be the required documentation we will need for the audit?

A3: Acceptable documentation to evidence funding requirements have been met by students participating in remote learning will be determined by each individual district’s (or educational entity’s) adopted local policy. Therefore, districts should be prepared to provide at the time of audit a copy of their adopted local policy if remote learning is used in the determination for funding by any student during the 2020 Student October Count data collection.

Q4: If the school year starts in one setting (e.g., in-person) but transitions to another setting (e.g., 100% online learning) prior to or in the middle of the October Count window, how does this affect the October Count?

A4: CDE policy provides flexibilities to accommodate transitions between various phases that include remote learning (100% and hybrid learning) throughout the school year as long as the district has adopted local policy. If a district is using remote learning at any time during the 2020 Fall semester, funding status will be determined



the same way had the student received all instruction in-person as evidenced by the in-person calendar and bell schedule and/or calendar and equivalency statement.

Q5: What funding codes should be used for students receiving hybrid or 100% remote learning during the semester of the pupil enrollment count date?

A5: If students are receiving:

- Hybrid learning which includes a combination of both in-person and remote learning, the student should be reported with a “brick and mortar” funding code (i.e. NOT 91, 92, 94, 95, 96).
- 100% remote learning not provided for by an approved online school or program, the student should be reported with a “brick and mortar” funding code (i.e. NOT 91, 92, 94, 95, 96).
- 100% remote learning per adopted local policy (for brick and mortar students) who remain enrolled in their brick and mortar school, but who are taking supplemental online courses through an existing district online school or program, should be reported with a “brick and mortar” funding code (i.e., NOT 91, 92, 94, 95, 96).
- Students who are enrolled and participating in an online school or program, and do not remain enrolled in their brick and mortar school (i.e., student withdraws from the brick and mortar school and transfers to the online school or program), should be reported with an appropriate online funding code (i.e., 91, 92, 94, 95, 96). In this instance, the student is NOT considered a brick and mortar student, and the online school and program requirements will apply.

Q6: Can districts offer a 100% remote learning option to its families even if in-person learning is available?

A6: Yes. CDE policy provides flexibilities to allow districts to accommodate families with 100% remote learning options.

Q7: What options are being considered for districts if state health mandates prevent all students from being physically present on the Pupil Enrollment Count Day?

A7: CDE policy provides flexibilities for districts related to remote learning in the event of public health and safety measures associated with the COVID-19 pandemic. As long as the district has an adopted local policy which includes remote learning and describes ways in which instruction will be delivered and attendance taken, then any remote learning that occurs on the pupil enrollment count date as described in adopted local policy can be used to show a student was “present” on the pupil enrollment count date.

- Any student absent (for any reason) on the pupil enrollment count date can still meet the attendance requirements for funding (through in-person, remote learning, or combination of both) if the following criteria are met:
 - Student established attendance at least one day during the current school year prior to the pupil enrollment count date
 - and
 - Resumed attendance within 30 days following the pupil enrollment count date.

Q8: If our district is implanting a temporary online program to provide families with a 100% remote learning option for the 20/21 school year, does this program need to meet the school day and instructional hours requirements?



A8: Yes, districts must ensure that their temporary online program provides for at least 160 school days and the equivalent instructional hours requirement.

Retained Kindergarten Students

Kindergarten students who are retained for a second year of kindergarten due to a significant reading deficiency (SRD) and who are participating in a half-day program are eligible for full-time funding.

Because the Spring 2020 READ Act data submission did not occur, districts may submit evidence of a significant reading deficiency based upon mid-year assessments from the 2019/2020 school year.

- Assessment results should clearly list the student's name, date of assessment and scores.
- A list of available assessments can be found at the following location:
<http://www.cde.state.co.us/coloradoliteracy/readinterimassessments>

Student Schedules

The following questions and answers are meant to provide clarification relevant to remote learning used in the determination for funding during the 2020 Student October Count data collection and subsequent funded pupil count audit.

Q1: For funding purposes, how will scheduled teacher-pupil instruction and contact time be determined for students participating in remote learning (100% or hybrid)?

A1: If districts will be including remote learning in the determination for funding, they will need to [adopt local policy](#). As part of this policy, districts will need to determine the equivalent amount of teacher-pupil instruction and contact time associated with the remote learning being delivered.

- For example, if a student is engaged in hybrid learning, the district's equivalent instruction and contact time during remote learning may be the same as the amount of instruction the student receives during in-person instruction, or modified based on the activities occurring during remote learning.
- For example, if a student is engaged in 100% remote learning, the district's equivalent instruction and contact time could be based on the amount of instruction the student would have received if engaged in 100% in-person instruction, assuming the same amount of academic content is being covered during remote learning as would have been covered during in-person instruction.
- Reminder: Regardless of how instruction is being delivered, a student must meet the scheduled hours requirement for funding:
 - Part-time funding: student is scheduled to receive at least 90, but less than 360, hours of (actual or equivalent) teacher-pupil instruction and contact time during the semester of the pupil enrollment count date.
 - Full-time funding: student is scheduled to receive at least 360 hours of (actual or equivalent) teacher-pupil instruction and contact time during the semester of the pupil enrollment count date.

Q2: What audit documentation will be needed to evidence scheduled instructional hours for students participating in remote learning (100% or hybrid)?

A2: The same audit documentation will be required for students enrolled in remote learning as students who are receiving 100% in-person instruction. Districts will need to provide a calendar, bell schedules (for in-person and remote learning, if different than in-person), and individual student schedules (for students in grades 6-12).



Q3: Individual school bell schedules may not reflect the actual times students are learning remotely. Will this impact funding?

A3: As long as districts have adopted board policy as well as equivalent bell schedules/statements for remote learning, students participating in remote learning will be eligible for funding as long as they meet the funding requirements (i.e., enrollment, attendance and scheduled hours). Please refer to the 2020 Student October Count Audit Resource Guide for additional information.

Q4: Will districts be required to identify on student schedules which courses were 100% in-person, hybrid or 100% remote during the semester of the pupil enrollment count date?

A4: As long as the district has adopted local policy, student schedules do not need to differentiate between courses offered through in-person, hybrid or 100% remote delivery.

- Districts will be required to provide all applicable audit documentation evidencing students have met the funding requirements; however, the adopted local policy may prescribe acceptable ways in which attendance can be taken and documented, and teacher-pupil instruction and contact time can be applied to student schedules (during remote learning). **Work-Based Learning Experience Courses**
- For the Fall 2020 semester, districts will be required to provide all audit documentation as outlined in the Audit Resource Guide) in order to include these courses in the determination for funding (i.e., scheduled hours documentation that includes total number of hours scheduled to work, cross-walk regarding credits, and statement indicating equivalent instruction/contact time).
 - Reminder: Work-Based Learning Experience Courses are evaluated based on scheduled work hours as indicated by the scheduled hours documentation.
 - If these courses are scheduled and started at the beginning of the 2020 fall semester term but are then impacted due to public health and safety measures related to the COVID-19 pandemic, these courses can still be used in the determination for funding with appropriate audit documentation.
 - If such courses are not available to students at the start of the 2020 fall semester term as a result of the adopted local policy and/or public health and safety measures related to the COVID-19 pandemic, the district should make appropriate schedule changes.