#EachChildOurFuture

FY2021 Community School Full Time Equivalency (FTE) Review Manual

OFFICE OF BUDGET AND SCHOOL FUNDING
OFFICE OF FIELD RELATIONS

AUGUST 1, 2020

Ohio | Department of Education

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Introduction

Community schools enter data concerning the enrollment and attendance of their students in the Education Management Information System (EMIS). EMIS data populates the Ohio District Data Exchange System's (ODDEX) School Options Enrollment System (SOES). The Ohio Department of Education uses SOES data to inform public districts about their students who are enrolled in community schools. Area coordinators conduct full-time equivalency (FTE) reviews to verify the accuracy of the enrollment and attendance data reported by community schools in EMIS.

A Department FTE review team examines enrollment and attendance policies, student enrollment data and the school's procedure for maintaining enrollment, and attendance documentation that indicates whether the data reported to the Department for funding is accurate and the school's policies are compliant with governing laws and rules. The review team compares the source enrollment and attendance data with the EMIS data the community school submits for funding and checks to make sure that for a student with disability (SWD), the individualized education program (IEP) and Evaluation Team Report (ETR) are current and properly identify a disability condition and funding category code.

This handbook describes the procedures reviewers use to conduct FTE reviews. It gives information on what documentation community schools must collect and maintain and addresses issues involved in conducting FTE reviews. **The FTE reviewer or team may use discretion in implementing the various aspects of the review, as long as the reviewer is consistent with governing laws, rules and this manual to ensure he or she conducts the review properly and consistently. Unique aspects or programs of a school may require the area coordinator to modify or skip certain steps in the review process and accept alternative supporting documents. Some sections of the manual require area coordinators to perform certain actions; those are not optional. If an area coordinator has questions, he or she should consult with the Office of Budget and School Funding and / or Legal before proceeding.**

The area coordinator has the authority, consulting with relevant Ohio Department of Education offices, to request any documents he or she needs to complete the review. The area coordinator can request those documents from any appropriate employee of a community school or traditional school district. Nothing contained within this handbook shall be construed as limiting the area coordinator or other charged personnel in obtaining such documentation or information as necessary to complete the review mandated under Ohio Revised Code 3314.08(K)(1).

Words and paragraphs in this FTE Review Manual that are in italics, such as this sentence, are reference to legal citations in Ohio Revised Code.

Disclaimer: Any references to log-ins only relate to participation. State law requires e-schools to track students' log-ins and log-outs to document students' participation in a school's learning opportunities. Any references to blended learning do not apply to e-schools in accordance with ORC 3302.41(C).

Note: As a result of the ordered school-building closure, stay-at-home orders, and the necessity to implement social distancing measures as a result of the COVID-19 pandemic, wherever the terms “on-site,” “visit,” or ‘in-person” are used in this manual, area coordinators may use virtual means of communication as a suitable substitute if necessary. A new section to this manual, **Suggestions for a Virtual CS FTE Review**, has been added as an appendix to assist area coordinators and community schools navigate a virtual FTE review in lieu of an on-site, in-person visit.

Timeline for Area Coordinator

- By Aug. 1: The FY21 CS FTE Review Manual will be posted to the Department's website and community schools/sponsors will be notified by the Department via email.
- By Sept.15: The Office of Budget and School Funding will notify community schools selected for an FTE review because the schools are:
    - Due for regularly scheduled FTE reviews (normally every five years); Added based on Department office recommendations and criteria listed on page 4 of this manual; or
    - New community schools for that school year.
- By Oct. 31: Area coordinators will conduct orientation visits to new community schools per this manual.
- By Jan. 31: Area coordinators will contact all community schools to discuss the FTE review process and requirements.
- By June 30: Area coordinators will conduct FTE Reviews for all schools unless authorized by the Office of Budget and School Funding to conduct FTE Reviews after June 30.

Note: FTE reviews should be completed within seven business days of being notified by the Office of Community Schools of a merging, closing, closed or suspended community school.

Annual FTE Reviews — Selection of Community Schools

ORC 3314.08(K)(1) – *If the department determines that a review of a community school's enrollment is necessary, such review shall be completed and written notice of the findings shall be provided to the governing authority of the community school and its sponsor within ninety days of the end of the community school's fiscal year unless extended for a period not to exceed thirty additional days….*

The Office of Budget and School Funding will identify community schools due for regularly scheduled FTE reviews (minimally once every five years).

Additional community schools may be added to the FTE review list for the current fiscal year for these and other reasons:

- New community schools (new IRN);
- Community school that moves to new a location or operates in multiple facilities;
- Schools that have not been reviewed for the previous five years;
- Community schools overpaid by 10 percent or more in the previous school year;
- Community schools that went insufficient in any monthly payment in the previous fiscal year;
- Office of Budget and School Funding recommendations;
- Issues identified by the Auditor of State in regular financial audit or other reviews;
- Area coordinator recommendations;
- Office of Community Schools recommendations; and
- Community schools with a significant number of reporting errors, as identified in EMIS, at the end of the previous school year. This would typically involve reporting errors that impact funding;
- Community schools, which reviews were moved from FY20 due to Ohio's ordered school-building closure;
- Random selection of community schools.

Area coordinator recommendations may include community schools that have changed locations or added grades in a different location or schools that have faced local issues including, but not limited to, documented financial concerns on the most recent state audit and or substantial changes in enrollment. Area coordinators should send such recommendations to the Department's Community Schools payment administrator as soon as possible.

New Community School Orientation Visit

Area coordinators must visit newly chartered schools prior to Oct. 31 of their first year of operation. To complete this effort, the Community Schools payment administrator will provide a list of new schools to each area office by Oct. 1 of each year. The list should include accurate school addresses, phone numbers, school administrators and a calendar for the current school year.

Area coordinators should schedule orientation visits for schools that open after Oct. 31 within 30 days of each school's opening. They should enter this visit as a meeting in the **Schedule** Tab of the Compliance System in the **Community School FTE Review** module and title the meeting "**New CS Orientation.**" See the Appendix for instructions on using the Compliance System.

The area coordinator will contact the new school and schedule a visit at a mutually convenient time and date (see sample letter in the appendix).

During the orientation visit, the area coordinator will review the following:

1. The school's annual calendar as reported in EMIS against the school's actual operating calendar (please note schools may have more than one calendar depending on their operation);
2. The school's reporting in hours and the effect on the calculation of the FTE;
3. The role of the FTE Adjustment Report and how the school can use it;
4. Flagging procedures;
5. The role of the area coordinator in general and in the resolution of flags;
6. Funding timeline and payment reporting;
7. ETRs and IEPs, disability conditions and funding category codes;
8. The FTE review process (the Community Schools FTE Review Manual posted on the Department's website) and the use of the Compliance System;
9. Original source documents for documenting attendance;
10. Calamity days and make-up days;
11. Written enrollment and attendance policies;
12. Credit flexibility; kindergarten early entrance and/or acceleration policies, if applicable
13. The EMIS Manual, as necessary;
14. HB 410 (habitual truancy, excessive absences, chronic absenteeism);
15. Residency verification process;
16. College Credit Plus and career-technical education funding (if a middle or high school); and
17. Any other topic the area coordinator feels should be discussed.

Contacting Schools that will Receive FTE Reviews

Between Oct. 1 and Jan. 31, area coordinators should contact all community schools that will receive FTE reviews to do the following:

- If the school requests it, schedule in-person or virtual meeting to answer questions about the FTE review process and manual (this is recommended but not required). As a best practice, the area coordinator should select a few student records and use the manual and survey to provide the school with a preview of what to expect during the FTE review. Area coordinators may use their discretion in requiring this step.
- Answer questions in-person, virtually, by phone or via email about the FTE review process, including discussing the procedures, learning opportunity documentation requirements, timelines and scheduling an on-site portion of the review.
- If the school requests it, schedule workshops, virtual or in-person meetings to review the school's learning opportunity documentation system or methods, records, computer system (if applicable) and procedures. Area coordinators may use their discretion in requiring this step.

- The area coordinator should enter the meeting in the Schedule Tab of the Compliance System in the Community School FTE Review module and title the meeting "Pre-Review Orientation." If it is an on-site orientation visit, he or she selects On-site Review. If the Pre-Review Orientation is conducted via email, phone, or any other remote process, he or she selects Desk Review. See the Appendix for instructions on using the Compliance System.

New community schools will participate in the orientation meetings described here. Area coordinators should use their discretion in all aspects of the meeting to determine what level of information, assistance and explanation the community school needs to fully understand the FTE review process. Area coordinators and community schools should work together to determine if they need a more in-depth meeting to explain the FTE review process. For example, it may be in the best interest of a community school to receive a full orientation visit, even if it is not a new school.

Requirements for E-schools and Schools with Blended Learning Models

Area coordinators must schedule meetings with e-schools and schools with blended learning models at the beginning of the school year (October and November) to learn about each school's learning opportunity documentation methods and educational delivery system. Area coordinators need to know about the system and its capabilities and limitations before the review. This meeting is in addition to other meetings to discuss the FTE review process and manual.

The reviewer will ask the school to upload to the Compliance System a written description of how time is claimed for funding which includes:

- The student's total learning opportunity and how the school calculates the time value to create that total;
- The method the school uses to transform the online raw durational data from different vendors into the participation time for a student that the school is claiming for funding purposes;
- Instruction time in non-classroom-based learning opportunities for which a student receives credit and how this instruction time is assessed and certified through EMIS by an employee of the community school.

The school can use the **E-school and Blended School FTE Review Guiding Questions** document in Appendix to help prepare a comprehensive description.

The area coordinator should enter the meeting in the Schedule Tab of the Compliance System in the Community School FTE Review module and title the meeting "Pre-Review Orientation." If it is an on-site orientation visit, he or she selects On-site Review. If the Pre-Review Orientation is conducted virtually, he or she selects Desk Review. Notes can be entered describing the school's learning opportunity documentation methods and educational delivery system. See the Appendix for instructions on using the Compliance System.

Information to be Provided to a Community School Before an FTE Review

The following information should be emailed to the community school prior to the scheduled FTE review. If it is an e-school or school using a blended learning model, the area coordinator should update the list of items to include all documentation of student participation in learning opportunities, as outlined on pages 14-20 of this manual.

Example Email Message

This is to confirm that I will be conducting an FTE review of your school's student enrollment and attendance policies and records for the 2020-2021 school year and will examine the school's procedures for maintaining enrollment, attendance and other documents that substantiate the full-time equivalency reported for funding. I will arrive at your school at 9 a.m. on Tuesday, Jan. 14, 2021. As part of the review, I will be comparing the school's enrollment and attendance data with the school's EMIS data and will help to resolve challenges identified by any error flags.

Supporting documentation must be uploaded in the Compliance System **Community School FTE Review Document Tab** at least two weeks prior to the scheduled visit. For instructions on navigating the Compliance System, see the Appendix in the FY21 Community Schools FTE Review Manual. Please upload the following documents:

1. Copy of the contract with the school's sponsor (or a link to the contract on the Department's website);
2. The community school's written enrollment and attendance policies/procedures;
3. Board-approved kindergarten early entrance policy and/or acceleration policy, if applicable;
4. Board-approved credit flexibility policy, if applicable;
5. Board-approved school "operating" calendar; and
6. E-school and blended school: written description of how the time is claimed for funding (not necessary if it was already provided for pre-review orientation).

I will email the SSIDs of the sample of students whose records will be reviewed **XXXX – insert time (*Use the guidelines on page 8 to determine how far in advance you will need to send the sample and indicate this in this message*).** The school should match SSIDs in the sample to the students' names and provide this list on arrival. The files should be arranged by SSID in the same order as they appear in the sample. (***The directions on how to obtain FTE Detail Report are on page 22. They can be shared with the school. The area coordinator can determine how to organize files based on their preference***). The following records should be made available for review for each active and inactive student:

- Birth record;
- Proof of residency;
- Enrollment form;
- Withdrawal documentation (if applicable);
- Proof of attendance by way of an original source document;
- Credit flexibility student: student's plan;
- Student with disability: all ETRs and IEPs effective during the current school year;
- E-school: documentation showing that a computer was supplied by the school or a waiver if the student is not using a school computer;
- E-school and blended school: Documentation of participation in learning opportunities per pages 14-20 of the FY21 Community Schools FTE Review Manual.

I will complete the **Community School FTE Review Survey** in the Compliance System. Issues identified may need additional follow up. The report of the review will be emailed to school and will be available in the Compliance System. For instructions on using the Compliance System, see the Appendix in the FY21 Community School FTE Review Manual. Any finding that results in additional funds owed to the school or funds the community school owes to the state will be documented in the Compliance System.

The reviewer or the area coordinator has the authority, in consultation with the relevant Department offices, to request such documentation as necessary to complete the review from any necessary personnel of the community school or of the traditional public district. Nothing shall be construed as limiting the area coordinator or other charged personnel in obtaining such documentation or information as necessary to complete the review mandated under ORC 3314.08.

Sample of Student Records Selected for an FTE Review

The Department's Community Schools payment administrator will provide the area coordinator with the file that will contain the sample of SSIDs selected for review, EMIS calendar, FTE Adjustment Report and FTE Detail Report. The CS payment administrator will also provide to the area coordinator any relevant information regarding the additional issues that can be addressed during the FTE review. The sample file and additional information will be sent no later than three days before the scheduled review. Area coordinators will email the sample to the schools 24 hours before the visit.

- For schools with fewer than 300 records, sample is a minimum of 25 records;
- For schools containing between 301 and 2,000 records, sample is 8 percent of student records, with a minimum of 25 records selected. If the list contains more than 1000 records, 50 percent of the SSIDs selected may be provided to the school two business days before the FTE review;
- For schools with 2,001 or more records, sample is 5 percent of the student records, with a minimum of 160 and a maximum of 350 records selected. Eighty percent of the SSIDs selected may be provided to the school two business days before the FTE review;
- Twenty-five percent of the sample (regardless of total sample size) are the students coded with a disability status on the FTE Detail Report.
- For e-schools and blended schools the durational sample will be equal to the sample size or 50 students, whichever is smaller.
- For schools with credit flexibility policy – 5 students participating in credit flexibility.

Community School FTE Review Visit

Timeline

The area coordinator will contact each school by Jan. 31 to discuss the FTE review process, answer questions and schedule a review date. The area coordinator and the school can discuss the best way to conduct the review: either on-site or virtually. See Appendix on page 46 for suggestions on conducting virtual reviews.

Once the review is scheduled, the area coordinator should enter the date of the review in the Compliance System, **Schedule** tab, select **On-site Review** or **Desk Review** type and title the meeting "**FTE Review.**" This will allow the Department's Community Schools payment administrator to prepare and send the sample file to the area coordinator in the proper time.

Area coordinators will complete the review for all schools by June 30, but they may go past the June 30 deadline with approval from the Department's Office of Budget and School Funding. Area coordinators should wait until after the end of the school academic year to conduct e-school and blended school reviews.

This timeline does not apply when a community school is closing at the end of the school year. The next section contains additional guidelines for when a school is closing or has closed.

ORC 3314.08(K)(1-3) *states:*
(1) If the department determines that a review of a community school's enrollment is necessary, such review shall be completed and written notice of the findings shall be provided to the governing authority of the community school and its sponsor within ninety days of the end of the community school's fiscal year, unless extended for a period not to exceed thirty additional days for one of the following reasons:

(a) The department and the community school mutually agree to the extension.

(b) Delays in data submission caused by either a community school or its sponsor.

(2) If the review results in a finding that additional funding is owed to the school, such payment shall be made within thirty days of the written notice. If the review results in a finding that the community school owes moneys to the state, the following procedure shall apply:

(a) Within ten business days of the receipt of the notice of findings, the community school may appeal the department's determination to the state board of education or its designee.

> *(b) The board or its designee shall conduct an informal hearing on the matter within thirty days of receipt of such an appeal and shall issue a decision within fifteen days of the conclusion of the hearing.*
> *(c) If the board has enlisted a designee to conduct the hearing, the designee shall certify its decision to the board. The board may accept the decision of the designee or may reject the decision of the designee and issue its own decision on the matter.*
> *(d) Any decision made by the board under this division is final.*

(3) If it is decided that the community school owes moneys to the state, the department shall deduct such amount from the school's future payments in accordance with guidelines issued by the superintendent of public instruction.

Community School FTE On-site Review

During the FTE review, the area coordinator shall:

1. Compare the school's EMIS calendar with the board-adopted "operational" calendar for accuracy, verifying that:
   a. Beginning and ending dates for students are correct;
   b. The number of annual instructional hours for students are correct and distributed proportionately across the school's calendar year, considering school breaks;
   c. Each school day contains the number of instructional hours needed to meet daily or annual requirements, as stated in the contract;
   d. Each school day contains the number of instructional hours indicated in EMIS and in the annual school calendar, not counting the lunch period and recess.
2. Review enrollment and attendance policies. Review kindergarten early entrance policy and/or acceleration policy, if applicable. Review credit flexibility policy, if applicable.
3. Review the school's contract to see if the school is authorized to use a blended learning model. ORC 3302.41 states that an e-school is not a blended school.
4. Review the records of all the selected students for accuracy to ensure that each record contains all relevant documentation.
5. Verify that the FTE reported on the student sample is supported by enrollment and original source attendance data, including entry dates, withdrawal dates, attendance documentation and participation in learning opportunities documentation.
6. Re view student's credit flexibility plans.
7. Review the special education documentation for each student with a disability in the sample. Students with disabilities are eligible for funding if:
   a. The ETR lists the disability of the student and is current;
   b. The IEP is in effect for the current school year;
   c. The disability designation (in EMIS) matches the disability on the current ETR;
   d. The **initial** IEP is signed, but this only needs reviewed by the area coordinator if this is the initial IEP for newly identified students.
8. At the completion of the student records review, the coordinator may discuss any errors he or she discovered. These may include, but are not limited to, original source data that does not support entry or withdrawal dates, improperly identified districts of residence, students who do not have enrollment documentation on file such as birth certificates or proofs of residency, lack of learning opportunity documentation or other issues that may arise.

If the area coordinator found errors during the review, he or she may choose to select additional records to review. The Department highly encourages area coordinators to contact the Department's Community Schools payment administrator to request a sample and guidance if more than a few additional records are needed. The area coordinator may, coordinating with the Department's Office of Budget and School Funding representative, refer the school to the Office of Community Schools and the Office for Exceptional Children for further follow up.

CS FTE Review Survey, Issues, Action Plans and Reports in the Compliance System

An area coordinator may discuss preliminary results of the FTE review with the community school before the conclusion of the visit, but the area coordinators should communicate that any discussion will not be considered final results of the review as the Department must review and evaluate the information received during the visit.

The reviewer will complete the survey, identify any issues and outline the follow-up action needed to resolve issues in the Compliance System. The area coordinator will email the report to the school. In addition, the school can generate a PDF report within the Compliance System. If there are issues that require follow up, the school will need to enter the action plan into the Compliance system and show proof to the area coordinator that it has resolved the issue. The area coordinator will review the documentation and enter comments in the Compliance System indicating that issues were resolved. Once all the issues are resolved, the Department representative will mark the Issue closed and Action Plan implemented and the school can generate a PDF report in the Compliance System for its records. See the Appendix for instructions on using the Compliance System.

FTE Reviews of Merging, Closing, Closed or Suspended Schools

The area coordinator should use these guidelines when completing an FTE review in a community school when it is merging or closing, after it has closed during the current school year, or when its operation has been suspended. When two or more community schools merge, the school(s) that are closing to merge into other schools will receive an FTE review.

The Office of Community Schools established procedures concerning where originals and copies of records are to be sent after a community school closes. See the Office of Community Schools' guidance document entitled "Community School Closing Procedures."

Timeline

The FTE review must be conducted **within seven business** days of the merging or closing, if possible, or within seven business days after notification by the Office of Community Schools and/or the Office of Budget and School Funding.

In a situation where it is known that a community school will be closing after the school year is over, the reviewer(s) shall follow the procedures in the Community School FTE Review Manual and conduct the review, preferably before the last day of instruction or immediately after the end of the school year.

In the case of an emergency closing, the availability of records, files and original source documentation often can be lost, misplaced, stolen or inaccurate. If all records are not at the site and available immediately, area coordinators may allow the school up to 21 days after the closing or after the notification date of the closing, if it is later, to find the records and make them available for the review. All available attendance and enrollment documentation must be present at the beginning of the review.

Notification

The area coordinator must notify the school administration and the school sponsor of the time and date of the review visit by telephone (for speed) and email (for written documentation). The notification should include information about the specific documentation that is needed for the review, for example, student files, attendance records, special education records or original source data. Notification should indicate the necessity of the sponsor or the administrator to attend the exit conference following completion of the review.

Review Guidelines

Two or more coordinators may work together (one of whom takes lead responsibility) to complete the review. If the school's FTE is fewer than 200 and the coordinator feels comfortable, one coordinator may complete the review.

If original source documentation of attendance is not provided, students shall be considered present only on days when attendance is documented.

All students have to be withdrawn on the last day the school was in session.

An exit conference (sponsor, administrator or EMIS coordinator) will be conducted before the conclusion of the review visit.

When finished, the lead reviewer will complete the **Community School FTE Review Survey** in the Compliance System as soon as possible. Areas of compliance and noncompliance will be identified there. Any unresolved issues will need follow up. The area coordinator will email the report to the school. In addition, the school can generate a PDF report within the Compliance System. See the Appendix for instructions on using the Compliance System.

Internet or Computer-based Community School (E-school) FTE Review Procedures

ORC 3314.02(A)(7) – *"Internet-or computer-based community school" means a community school established under this chapter in which the enrolled students work primarily from their residences on assignments in non-classroom-based learning opportunities provided via an Internet- or other computer-based instructional method that does not rely on regular classroom instruction or via comprehensive instructional methods that include Internet-based, other computer-based and non-computer-based learning opportunities.*

Commencing of Instruction in an E-school

ORC 3314.08(J)(1) – *No student shall be considered enrolled in any internet- or computer-based community school or, if applicable to the student, in any community school that is required to provide the student with a computer pursuant to division (C) of section 3314.22 of the Revised Code, unless both of the following conditions are satisfied: (a) The student possesses or has been provided with all required hardware and software materials and all such materials are operational so that the student is capable of fully participating in the learning opportunities specified in the contract between the school and the school's sponsor as required by division (A)(23) of section 3314.03 of the Revised Code; (b) The school is in compliance with division (A) of section 3314.22 of the Revised Code, relative to such student.*

E-school FTE Review Guidance

When reviewing an e-school, coordinators must follow the review procedures listed in this manual and in the survey; however, some procedures will vary in level of detail and will be different because of the e-school's legal obligations and unique situation.

The reviewer should keep in mind that, in some respects, e-school funding is different from funding of other community schools. E-school funding consists only of the formula amount (based on an accurate FTE calculation), the special education weighted funding and career-technical education funding. There are no funds for economically disadvantaged students, targeted assistance, limited English proficiency students, K-3 literacy or transportation. A reviewer must pay careful attention to the relationship between the hours and days of instruction and the daily and hourly attendance documentation used to calculate the percent of time for each student, which will affect the e-school's FTE funding.

When reviewing an e-school, the reviewer must follow all the review procedures in the **Community School FTE Review Survey for E-schools and Blended Schools**, incorporating these required procedures:

1. The reviewer will check original source documentation that shows a computer was delivered to each student. This documentation should be signed by the parent to verify delivery and setup dates. Other reasonable documentation of the delivery and setup, such as a packing notice, delivery schedule notice or other record also is acceptable. A signed waiver is permissible if the student already has a computer.

   The reviewer will check documentation that determines the first log-on in which a student has accessed a learning opportunity. A student who does not log on at all in the new school year is considered a “no show” and will not be funded. For more information review **Start Date/From Date** and **No Show** sections of this manual.

2. An e-school is required to maintain student attendance records, as specified in the e-school’s written attendance policy. The reviewer will check and verify the e-school has a written attendance policy and the e-school is following the policy. The reviewer will check the attendance record procedure maintained by the e-school.

3. The reviewer will check the individual attendance records for at least 50 students in the sample. If the review sample has fewer than 50 students, the reviewer should check the record for every student in the sample. These attendance records should show when a student accessed learning opportunities and how long the student participated in those learning opportunities if the online system is able to document them. A learning opportunity for an e-school student could be a documented computer time for doing homework in any subject, reading resource documents, writing research papers, taking tests at the school, doing research, conferencing with teachers or other similar activities. If the school’s online system cannot document learning opportunities that take place within the system, the school must document them per the requirements outlined in the section titled **Learning Opportunity Documentation Requirements for E-schools**.

   All non-classroom-based activities also must be documented in a form consistent with this manual and certified in writing by a licensed teacher as meeting the criteria established for completing the learning opportunity. Documentation of instruction time must include hourly, daily, and weekly accounting that the student accessed a learning opportunity during documented hours. See **Guidance on Conducting FTE Reviews for Schools Using Non-classroom-based Learning Opportunities** for more information on required documentation. Please note that this section requires area coordinators to add up the total amount of documented time based on original source documentation for at least 50 students if the sample is larger than 50 students.

4. The reviewer will discuss the written description provided during the pre-review orientation and confirm there have been no revisions or updates to the methodology. See page 6 of this manual. The reviewer will request that the **Total Learning Opportunity Records** for all e-school students be emailed to Office of Budget and School Funding staff or uploaded to the Compliance system within **five business days**, unless additional time is mutually agreed to by the school and an area coordinator, after completion of the on-site portion of the review. The Total Learning Opportunity Records, in Microsoft Excel format, contain these elements:
   a. Student SSID numbers (remember, this document should not contain student names).
   b. Student’s enrollment start and end dates (found on the school’s FTE Detail report). Some students may have more than one enrollment period (line) on the FTE detail report. The school should include all lines.
   c. Total hours for the student record based on student’s start and end dates.
   d. Total amount of documented time a student participated in online learning opportunities that occurred in and were tracked by the e-school’s online learning system. This figure should match the amount of time that may be tracked by the e-school’s online system, if applicable. If a e-school’s online system does not track the amount of time students participate in online learning opportunities, the school may document these learning opportunities using the guidelines outlined

in **Minimum Documentation Requirements for Non-classroom-based Learning Opportunities**. Ohio recognizes that e-schools may track online learning opportunities in different ways because they have different system capabilities. An e-school may have more than one online system that tracks the duration of learning opportunities. In these circumstances, the times may not overlap or be counted more than once. Time not on the computer (self-reported) may not overlap online time.

e. Total amount of documented time a student participated in **Other Learning Opportunities** or non-classroom-based learning opportunities. See the section titled **Guidance on Conducting FTE Reviews for Schools Using Non-classroom-based Learning Opportunities** for more information on required documentation and review.

f. Sum of the time in d and e as noted above. **The school must ensure that all overlapping time was removed and a 10 hour a day cap was applied to the sum of all different learning opportunities daily.**

g. Percent of Time is calculated by dividing Total Documented Learning Opportunities (f) into the Total Enroll for This Record (c).

Example of Total Learning Opportunity Records (Excel Format)

a	b		c	d	e	f	g
SSID	ENRL Start Date	ENRL End Date	Total Enroll for This Record	Computer-based Learning Opportunities (documented by the school's system) Total Hours	Other Learning Opportunities Total Hours	Total Documented Learning Opportunities	Percent of Time
SD8789755	8/24/17	5/25/18	920	820	80	900	98
WE8978975	01/16/18	5/25/18	440	80	150	230	52
HJ7786555	10/16/17	5/25/18	705	477	228	705	100

To ensure that each student is being funded only for documented time spent on learning opportunities, the reviewer, with help from the Department's Office of Budget and School Funding, will compare the total amount of verified time each student participated in documented learning opportunities to the percent of time being reported in EMIS for the student. This review will take place AFTER the FTE review visit. If the reported percent of time does not match the calculated percent of time, the reviewer will report these findings to the Department for follow-up.

An example template and instructions for percent of time calculation are available on the Community School Funding Information webpage.

Reviewing Total Learning Opportunity Records – Example

The e-school calendar has 950 hours of learning opportunities per school year. If student A was enrolled at the e-school for the entire calendar year and has 780 hours of verified learning opportunities, the percent of the 950 hours should be 82 (780 hours divided by 950 hours of possible learning opportunities = 82 percent).

Guidance on Conducting FTE Reviews for Schools Using Non-classroom-based Learning Opportunities

Community schools with non-classroom-based, non-computer-based learning opportunities are subject to the same FTE reporting and documentation requirements as all other community schools. Area coordinators must use the following guidance when conducting FTE reviews for schools with these types of learning opportunities. **Schools using blended learning models or e-schools must document learning opportunities that are not tracked and documented by an online or computer system and that do not take place within a traditional brick and mortar classroom.**

Non-classroom-based Learning Opportunities

ORC 3314.08(H)(2): *Learning opportunities shall be defined in the contract which shall describe both classroom-based and non-classroom-based learning opportunities and shall be in compliance with criteria and documentation requirements for student participation which shall be established by the department. Any student's instruction time in non-classroom-based learning opportunities shall be certified by an employee of the community school.*

Minimum Documentation Requirements for Non-classroom-based Learning Opportunities[1]

The schools must keep documentation for all non-classroom-based learning opportunities, and the teacher must certify them. These are the minimum requirements for non-classroom-based learning opportunities:

Schools may use the Alternative Learning Opportunity Documentation Log to document learning activities. Any documentation must include at least these elements:

a. Student SSID;
b. Brief description of learning opportunities, for example, class or course information;
c. Dates and times of actual learning opportunities;
d. Total of verified learning opportunities time;
e. Teacher certification of the reported learning opportunities (see **Teacher Certification**, page 21).

Schools cannot use estimated or approximated times to calculate percent of time. For example, if a school estimates an assignment should take 15 hours to complete and a student took only 10 hours to complete it, that student would receive credit for 10 hours.

A community school employee must document and certify through EMIS all non-classroom-based instruction hours. Schools may use different means to track documented learning opportunities; but it must apply its process consistently and adhere to the guidance in this manual and ensure that the reported time is not overlapping with other reported time. If the non-classroom activities are computer-based, the amount of time spent on them should match the amount of time the e-school's online system tracks, if applicable. If a school's online system does not track the amount of instruction time of students participating in online learning opportunities, the school may document these learning opportunities using the **Minimum Documentation Requirements for Non-classroom-based Learning Opportunities**. This required documentation is separate from the original source documents and may be compiled by either the student or school staff. In either case, its accuracy must be certified on a regular basis by a teacher who is licensed by the Ohio Department of Education and subject to the Licensure Code of Professional Conduct for Ohio Educators.

[1] Alternative Learning Opportunities may include non-classroom, non-computer-based learning opportunities. Examples of these include, but are not limited to work done at home online. It also may include computer/online learning opportunities that were not tracked by the school's computer/online system.

Learning Opportunity Documentation Requirements for E-schools

E-schools are required to document student participation in learning opportunities. Reviewers will check these records during the FTE review and may use the records to adjust the percent of time, which affects funding. E-schools will receive credit only for documented learning opportunities; **missed days (both excused and unexcused absences) or assignments do not count as hours**. No e-school will receive credit for any time a student spends participating in learning opportunities beyond 10 hours within any 24 consecutive hours per ORC 3314.08(H)(3). See the next section for documentation requirements for e-schools.

Online Learning Opportunities - Tracked by the E-school's System

An e-school may have a system that tracks learning opportunity participation within the school's online system. If an e-school's online system has this capability, the school must produce Excel spreadsheets showing the daily, weekly and monthly accounting of learning opportunities and the final total of all online learning opportunities that the student participated in and the e-school's system tracked. The e-school may have more than one online system that tracks durational time. In these circumstances, an e-school may not overlap times or count times more than once. Time not on the computer (self-reported) may not overlap online time.

The school must be able to email Office of Budget and School Funding staff or upload this documentation to the Department's Compliance System, on request, in Excel format and by SSID.

This spreadsheet should not have merged cells and should be set up for convenient review by the Department. Here is an example of a well-organized spreadsheet.

SSID	Start_Dtm	End_Dtm	Data_Source	Duration_Seconds
AB1234567	8/19/2016 11:34:34.000	8/19/2016 11:41:45.000	Online Vendor #1	431
AB1234567	8/19/2016 11:50:27.000	8/19/2016 12:21:26.000	Online Vendor #2	1859
AB1234567	8/19/2016 12:21:26.000	8/19/2016 12:43:31.000	Online Vendor #1	1325

Other Learning Opportunities

E-schools may offer learning opportunities that the school's online system does not track or that take place offline or not on a computer. In addition, some e-schools' online systems may not be able to track and document a student's participation in the online system learning opportunities. E-schools that have these situations must use the following minimum documentation requirements and must be able to provide area coordinators and Department officials the needed information on request.

Documentation must exist for all learning opportunities and must be certified by a teacher. Hours spent on other learning opportunities should not include the online hours the e-school already counted. Below are minimum requirements for **Other Learning Opportunities**.

Minimum Documentation Requirements: Any documentation must include at least the following elements:

a. Student SSID;
b. Brief description of learning opportunities, such as class or course information;
c. Dates and times of actual learning opportunities;
d. Total of verified learning opportunities time;
e. Teacher certification of the reported learning opportunities (see **Teacher Certification**, page 21).

E-schools may use the Alternative Learning Opportunity Documentation Log to document these learning opportunities, but it is not required. The log is simply an example of how an e-school can track these learning opportunities. It is up to the school to decide how to meet the tracking requirements.

E-schools cannot use estimated or approximated times to calculate percent of time. For example, if a school estimates an assignment should take a student 15 hours to complete and it took a student only 10 hours to complete, the student would receive credit for 10 hours.

Certification of Non-classroom-based Learning Opportunities

A teacher must document and certify all non-classroom-based learning hours. Schools may use different means to certify documented learning opportunities, but it must apply the process consistently and adhere to the requirements of this manual. If the non-classroom activities are computer-based, this should match the amount of time the e-school's online system tracks, if applicable. If a school's online system does not track the amount of time students participate in online learning opportunities, schools may document these learning opportunities using the **Minimum Documentation Requirements for Non-classroom, Non-computer-based Learning Opportunities**. That required documentation is separate from the original source documents and may be compiled by either the student or school staff, but its accuracy must be certified on a regular basis by a teacher who is licensed by the Ohio Department of Education and therefore is subject to the Licensure Code of Professional Conduct for Ohio Educators.

Total Learning Opportunity Records

E-schools must email Office of Budget and School Funding staff or upload into the Compliance System (in Excel format) both Online Learning Opportunities, Other Learning Opportunities and their sum for each student record by SSID and each enrollment period (see example on page 13).

An example template and instructions for percent of time calculation are available on the [Community School Funding Information webpage].

Learning Opportunity Documentation Requirements for Schools Using Blended Learning Models

Brick and mortar community schools using blended learning models provide learning opportunities through a combination of online and traditional classroom instruction at supervised physical locations away from home (school building). Attendance requirements, including a majority of time required in the school facility, should be detailed in each community school's education plan and student handbook. Appropriate documentation of student learning activities should include a combination of attendance in the school facility and documentation of online learning activities.

Schools using blended learning models are required to document student participation in learning opportunities. Area coordinators will review and check these records during the FTE review and adjust the percent of time, which affects funding.

Computer-based Learning Opportunities - Tracked by the School's Online System

Schools may have systems that track learning opportunity participation that takes place within the school's online system. If a school's online system has this capability, the school must be able to produce Excel spreadsheets showing the daily, weekly and monthly accounting of learning opportunities. It also must be able to show the final total of all online learning opportunities that a student participated in and that school's system tracked. A blended school may have more than one online system that tracks durational time. In this circumstance, the school cannot overlap the times or count them more than once. Time not on the computer (self-reported) may not overlap online time.

The school must be able to email Office of Budget and School Funding or upload this documentation to the Department's Compliance System, on request, in Excel format by SSID.

This spreadsheet should not have merged cells and should be set up for convenient review by the Department. Here is an example of a well-organized spreadsheet.

SSID	Start_Dtm	End_Dtm	Data_Source	Duration_Seconds
AB1234567	8/19/2016 11:34:34.000	8/19/2016 11:41:45.000	Online Vendor #1	431
AB1234567	8/19/2016 11:50:27.000	8/19/2016 12:21:26.000	Online Vendor #2	1859
AB1234567	8/19/2016 12:21:26.000	8/19/2016 12:43:31.000	Online Vendor #1	1325

Other Learning Opportunities

Schools may have learning opportunities their online systems do not track and that take place offline or not on a computer. Also, some school's online systems may not be able to track and document a student's participation in online learning opportunities. These schools must use the minimum documentation requirements for other learning opportunities, described below, and be able to provide area coordinators and Department officials with the information they need on request.

Schools must have documentation for all learning opportunities, certified by a teacher. Other learning opportunity hours should not include the online hours that already have been counted.

Minimum Documentation Requirements: Any documentation must include at least the following elements:

a. Student SSID;
b. Brief description of learning opportunities (class or course information);
c. Dates and times of actual learning opportunities;
d. Total of verified learning opportunities time;
e. Teacher certification of the reported learning opportunities (see **Teacher Certification** on page 21).

Schools may use the Alternative Learning Opportunity Documentation Log to document these learning opportunities, but it is not required. This is an example of how they can track these learning opportunities. It is up to the school to decide how to meet these requirements.

Certification of Non-classroom-based Learning Opportunities

Schools must document all non-classroom-based learning opportunities, and have a teacher certify them. Schools certify documented learning opportunities in different ways; but they must apply their processes consistently and adhere to the requirements of this manual. If the non-classroom activities are computer-based, this should match the amount of time the school's online system is tracking, if applicable. If a school's online system does not track the amount of time students participate in online learning opportunities, schools may document these learning opportunities using the **Minimum Documentation Requirements for Non-classroom, Non-computer-based Learning Opportunities**. That required documentation is separate from the original source documents and may be compiled by either the student or school staff. In either case, its accuracy must be certified on a regular basis by a teacher who is licensed by the Ohio Department of Education and therefore subject to the Licensure Code of Professional Conduct for Ohio Educators.

Classroom-based Learning Opportunities

Blended learning models used by Ohio community schools must require that students spend the majority of their school year on-site at their school facility. Schools should include all classroom-based learning opportunities that the students were expected to attend. Provided the school requires the students to attend a majority of time on-site, the school may get credit for all those classroom-based learning opportunities even if the student was absent, either excused or unexcused. For funding, these days and hours are treated just like learning opportunities at a brick and mortar school.[2]

Total Learning Opportunity Records

The reviewer will ask a school to email Office of Budget and School Funding staff or upload the **Total Learning Opportunity Records**, in Excel format, for all blended learning students to the Department's Compliance System. The school will do this within five business days of the on-site portion of the review, unless additional time is mutually agreed to by the school and an area coordinator. The Total Learning Opportunity Records, in Microsoft Excel format, contain these elements:

a. Student SSID numbers (remember, this document cannot contain student names).
b. Student's enrollment start and end dates (found on the school's FTE Detail report). Some students may have more than one enrollment period (line) on the FTE detail report. The school should include all lines.
c. Total hours for the student record based on student's start and end dates.
d. Total amount of all classroom-based learning opportunities that the student was expected to attend.
e. Total amount of documented time a student participated in online learning opportunities that occurred in and were tracked by the school's online learning system. This figure should match the amount of time that may be tracked by the school's online system, if applicable. If a school's online system does not track the amount of time students participate in online learning opportunities, the school may document these learning opportunities using the guidelines outlined in **Minimum Documentation Requirements for Non-classroom, Non-computer-based Learning Opportunities**. Ohio recognizes that schools may track online learning opportunities in different ways because they have different system capabilities. A school may have more than one online system that tracks the duration of learning opportunities. In these circumstances, the times may not overlap or be counted more than once. Time not on the computer (self-reported) may not overlap online time.
f. Total amount of documented time a student participated in **Other Learning Opportunities** or non-computer, non-classroom-based learning opportunities. This time should not overlap other reported time. See the section titled **Guidance on Conducting FTE Reviews for Schools Using Non-classroom, Non-computer-based Learning Opportunities** for more information on required documentation and review.
g. Sum of the time in d, e and f as noted above. **The school must ensure that all overlapping time was removed daily.**
h. Percent of Time is calculated by dividing Total Documented Learning Opportunities (g) into the Total Enroll for This Record (c).

[2] If the school does not require the students to attend a majority of time on-site, the school may receive funding for classroom-based learning opportunities, but the school may be referred to the Office of Community Schools for noncompliance.

Example of Total Learning Opportunity Records (Excel Format)

a	B		c	d	e	f	g	h
SSID	ENRL Start Date	ENRL End Date	Total Enroll for This Record	Classroom-based Learning Opportunities Total Hours	Computer-based Learning Opportunities (documented by the school's system) Total Hours	Other Learning Opportunities Total Hours	Total Documented Learning Opportunities	Percent of Time
SD8789755	8/24/17	5/25/18	920	460	360	80	900	98
WE8978975	01/16/18	5/25/18	440	220	10	0	230	52
HJ7786555	10/16/17	5/25/18	705	352.5	228	124.5	705	100

An example template and instructions for percent of time calculation are available on the Community School Funding Information webpage.

Schools Using Blended Learning Models and E-schools — Calculation of Percent of Time Based on Documented Learning Opportunities

A school must track and document the number of hours a student participates in learning opportunities, as required in this manual. The school will be considered to have provided one hour of learning opportunity for each hour of student work documented. The school will receive credit for providing partial hours of learning opportunities for each partial hour of student work documented, per this manual. Non-classroom learning opportunities are credited only for actual documented hours. **Excused and unexcused days of absence or assignments do not count as hours in e-schools**.

A student may combine hours from different learning modes. For example, a student with 460 documented hours of non-classroom time and 460 hours of classroom-based instruction would have 920 total hours. The classroom teacher must compile and keep documentation of classroom-based learning, such as attendance logs.

The school will report, for funding purposes, each student's percent of time based on hours of documented learning opportunities as a percentage of total school calendar hours or a total for a specific student's record (see **Percent of Time**).

Area coordinators should make sure the reported percent of time matches the documentation the school provides for learning opportunities. A school with blended learning opportunities must be ready to display online, classroom-based and non-computer non-classroom-based learning opportunity attendance records for each student.

If an area coordinator detects significant discrepancies or issues, the Department recommends he or she widen the sample of student records to review. All area coordinators should use their judgement and experience in making these determinations. The intent is to detect issues and resolve calculation and documentation issues regarding percent of time as early as possible.

Area coordinators should check for student records with the same configuration of non-classroom learning activities. Non-classroom learning opportunities naturally will vary among individual students. If a reviewer detects a pattern in which a significant number of students have the same, or a very similar, combination of online, classroom-based and non-computer non-classroom-based learning opportunities, he or she should investigate further and report these findings to the Department.

Regular and Year-End Percent of Time Adjustment for E-schools and/or Non-computer, Non-classroom-based Students

All e-schools and blended schools must adjust the percent of time in EMIS for their students based on the documented learning opportunities. The Department recommends updating the percent of time in EMIS quarterly. All community schools (e-schools and brick and mortar, which includes blended) must adjust the percent of time in EMIS for their students who are part time or participating in courses at joint vocational school districts or taking College Credit Plus courses. For more information, see **Percent of Time**.

Here are suggested “best practices” to help a school to comply with the rules and maintain predictable funding based on documented learning opportunities:

- Have a clear methodology for how all raw durational data is used to arrive at the total hours claimed for funding;
- Maintain daily logs of online, classroom-based and non-classroom non-computer-based learning opportunities;
- Ensure that if there is an overlap in durational time, the school counts each time only once between:
    - Different online systems; and
    - Online time, non-classroom non-computer-based time and classroom seat time, where applicable.
- E-schools: apply a 10-hour cap to total learning opportunities daily;
- Use Department template for the percent of time calculations;
- Conduct a timely adjustment to the percent of time in EMIS for withdrawn students;
- Estimate the percent of time for students based on the available records and enter it in EMIS quarterly.

Teacher Certification Example

I hereby certify, pursuant to my obligations under ORC 1702.54 and 31 U.S.C. § 3729, that I have no actual or constructive knowledge of _*(name of student)*__misreporting hours spent in non-classroom-based learning opportunities. To the best of my knowledge, _*(name of student)*__ spent _*(number of hours)*_ *hours during* ______*(month/year)*________ *toward the completion of the plan* agreed to on his/her behalf and _*(school name)*_ on (*date of last signature on plan*).

____

Name of teacher

____

Ohio Educator License Number(s)

____

Date

Obtaining a List of Students from the FTE Detail Report

Access the Data Collector (SIF Works VRF)

1. Click on the “Reports” tab.
2. Enter the IRN of the school in the LEA IRN field in the Filter Options Area.
3. Select FY21-S-SOES Final from the Collection Request dropdown box.
4. In the Display Options area, click on the “Level 2 Reports” radio button.
5. Click on the “Show Reports” link that is located below the Display Options area.
6. Click on the link that says (FTED-001) FTE Detail.
7. Open the .CSV file that is generated that contains the FTE Detail report.
8. Only the following columns are needed for the FTE review:

   RPT DEST IRN
   LAST NAME
   FIRST NAME
   SSID
   FTE FUND
   ENRL START DATE
   ENRL END DATE
   ORIG FTE
   ADJSTD FTE
   ADJSTD SPECED CAT FTE
   LEGAL DIST OF RES IRN
   STDNT PCT OF TIME
   STATE EQUIV GRADE LEVEL CODE
   DISAB CNDTN CODE
   SPECED CAT CODE
   ECON DISADV FLAG
   TOTAL ENROLL FOR THIS REC
   TOTAL FOR THIS CAL

Topics and Issues Related to Community Schools FTE Reviews

(Listed Alphabetically)

18-Year-Old Living Apart from Parents

An 18-year-old living apart from parents is either self-supporting or non-self-supporting.

If the student cannot prove self-support, the student is non-self-supporting.

The applicable section of the ORC is 3313.64(F)(1), which states*: "All persons at least eighteen but under twenty-two years of age who live apart from their parents, support themselves by their own labor, and have not successfully completed the high school curriculum or the individualized education program developed for the person by the high school pursuant to section 3323.08 of the Ohio Revised Code, are entitled to attend school in the district in which they reside."*

ORC 3313.64(F)(1) places three conditions that must be met for the adult to be able to attend the district where he or she resides. The first is living apart from his or her parents. ORC 3313.64 defines parents in the legal sense so the fact that there is another adult living in the household of the student is irrelevant to this situation.

The student does not meet Ohio's legal definition of a parent; therefore, the student does in fact live apart from the parents.

The second condition is supporting themselves by their own labor. If no evidence is presented that this is the case, the student does not meet this condition and, therefore, is not entitled to attend the district in which he or she resides. A student's receipt of SSI income is considered to represent support by one's own labor. Ohio Attorney General opinion 2014-026 states that the phrase "supports themselves by their own labor" means to finance or otherwise furnish the life necessities, including food, shelter and clothing, by means of their own physical or mental effort. The phrase does not apply to a person who depends on another for support. A person also may receive imputed income, meaning that other compensation besides wages can be considered in determining self-sufficiency.

The third condition of not completing the high school curriculum is presumed to be met.

The Department believes that if the 18-year-old student and adult does not support himself with his own labor, he is not entitled to attend school in the district in which he resides; therefore, the community school should point to the district where the residential custodial parent resides.

72 Consecutive Hours of Unexcused Absence Rule

ORC 3314.03(A)(6)(b) – *A requirement that the governing authority adopt an attendance policy that includes a procedure for automatically withdrawing a student from the community school if the student without a legitimate excuse fails to participate in 72 consecutive hours of the learning opportunities offered to the student.*

The 72-hour rule does not apply after the last day a community school was in session. If a school closes mid-year, the school must withdraw all students on the last day of instruction, even if 72 hours extend beyond the last day the school offered learning opportunities.

To determine the specific end date to be used in EMIS:

1. Look for the number of hours of daily instruction on the school's calendar in EMIS.
2. Divide the daily number of hours into 72 to determine how many instructional days the 72 hours represents.
3. Determine the student's last day of documented attendance or excused absence.

4. Count forward from the day following the last day of documented attendance or excused absence, the number of instructional days in #2 above, using the school calendar and counting days in session. Note the date.
5. The date from #4 should be the student's FTE withdrawal date in EMIS.

A school may use a partial day of attendance on the last day a student is enrolled.

When computing the 72 hours, a school should exclude calamity days but include calamity make-up days.

Attendance

Attendance is participation in learning opportunities provided by a community school as defined in the community school's contract with its sponsor.

This would include documentation of learning opportunity participation by a student enrolled in an e-school or a school using blended learning models (see **Learning Opportunity Documentation Requirements for E-schools and Learning Opportunity Documentation Requirements for Schools with Blended Learning Models**). It does not include days on which only enrollment and or orientation activities occur.

The Office of Community Schools has stated that schools may not count in a student's hours of receiving instructional services any orientation activities, which usually occur near the beginning of a student's enrollment in a community school; the student's start date does not include such orientation days.

The school must provide documentation that clearly shows the pupil has started participating in learning opportunities, either through attendance records or evidence that a student in an e-school has logged in to the system and accessed these learning opportunities (See **Computerized Attendance Record** and **Original Source Documents** and **Learning Opportunity Documentation Requirements for Schools with Blended Learning Models,** and House Bill 2 Guidance for Blended Learning for Community Schools).

Habitual truancy, excessive absences, chronic absenteeism

It is important for Ohio's students to be in class every day, ready to learn. Ohio defines chronic absenteeism as missing 10 percent or more of the school year for any reason. A child who is not in school is missing out on his or her education. All public schools in Ohio must implement the requirements outlined in HB 410 to reduce chronic absenteeism. They must track each student's attendance at least hourly, regardless of the student's calendar. For students under age 18, schools also must comply with HB 410 "triggers" for finding students excessively absent and truant. When passed, HB 410 did not change the requirement that students with 72 hours of unexcused absences in a community school must be withdrawn. See more information about HB 410 here.

How does non-attendance (excused or unexcused) affect school funding?

Brick and mortar community schools and blended schools (the classroom-based learning opportunities portion) receive funding regardless of student attendance (including excused and unexcused absences). E-schools and blended schools (non-classroom-based learning opportunities portion) receive funding based on documented learning opportunities.

Can a community school require student attendance records from a traditional public school?

A traditional school district does not have to give a community school any attendance records, but it does have to notify the community school of the date a student was last educated by the district. If the student was both enrolled in and attending a community school and a school district building at the same time, overlapping enrollment occurs. If a community school and a school district cannot resolve the disagreement, an area coordinator must review the documentation that both schools have and decide what date to use.

Remote Learning Plans and Attendance Considerations

Remote learning plans are a temporary requirement for the 2020-2021 school year only and apply to community schools that are not Internet/Computer based community schools and are not operating blended learning models. Community schools using remote learning plans should track attendance details locally to the degree that their current systems allow, as long as they are able to address the considerations outlined in the Department's Remote Education Planning guidance as well as Attendance Considerations for Remote Learning Plans guidance.

Blended Learning Model Schools

Ohio law permits community schools to use blended learning models — where some instruction is delivered in the community school's physical facility and some instruction is delivered online, allowing students some control over the time, place, path, and pace of their learning.[3] Blended learning models used by Ohio community schools must require that students spend the majority of their school year on-site at their school facility. If a community school will use a blended learning model, the community school's contract with its sponsor must: (1) state that the school is using a blended learning model and (2) include a description of the learning opportunities that will be offered to students, including both classroom-based and non-classroom-based settings. The community school delivering blended instruction must notify the Department by July 1 of a school year. For 2020-2021 school year the deadline has been extended to November 1.

If the reviewer determines through the review that the brick and mortar community school is operating as a blended school, he or she must contact the Department's Office of Budget and School Funding to load a **Community School FTE Review Survey for E-school and Blended School** into the Compliance System. The reviewer also should inform the Department's Office of Community Schools.

Calamity Days

ORC 3314.08(H)(4) *With respect to the calculation of full-time equivalency under* division (H)(3) of *this section, the department shall waive the number of hours or days of learning opportunities not offered to a student because the community school was closed during the school year due to disease epidemic, hazardous weather conditions, inoperability of school buses or other equipment necessary to the school's operation, damage to a school building, or other temporary circumstances due to utility failure rendering the school building unfit for school use, as long as the school was actually open for instruction with students in attendance during that school year for not less than the minimum number of hours required by this chapter. The department shall treat the school as if it were open for instruction with students in attendance during the hours or days waived under this division.*

If the community school has more hours on its school calendar than the minimum 920 hours required by statute and the community school declares a calamity day for the reasons outlined in ORC 3314.08(H)(4) above, the community school does not have make up hours or days for this closure as long as the minimum number of 920 hours is provided. If the number of hours drops below 920, the school must make up the number of hours needed for students to have 920 hours of learning opportunities.

A school may not include calamity days in a student's number of instructional days or hours when it reports the student in the ODDEX system. Calamity days also may not appear in the computation of the 72 hours or equivalent days that occur before a student's withdrawal for unexcused absences.

One way to make up time missed within the minimum required hours is to require students to complete classroom lessons posted on the community school's web portal or website. Before Aug. 1 of each school year, the governing authority of a community school can adopt a plan to make up hours in that school year.

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[3] See ORC 3301.079(K)(1) read in conjunction with the definition of "internet or computer based community school defined in ORC 3314.02(A)(7).

The plan explains how the school will make up the missed hours, up to the equivalent of three scheduled days (ORC 3313.482). Schools no longer submit locally approved plans for this purpose to the Ohio Department of Education. A district's plan should include the written consent of the teachers' employee representative, per ORC 3313.482. The area coordinator can request a copy of this plan for review if a community school used that option. The area coordinator should make a note of this in the **Compliance System CS FTE Review Survey Calendar** question.

Closing or Suspended Community Schools Records

Sponsors are required to ensure that all school records to be shared with the Ohio Department of Education, Ohio Auditor of State, U.S. Department of Education and other interested entities are secured and available for completing the school's closing. Records generally describe an account in permanent form and preserve knowledge or information about facts, transactions or events. They are kept for the proper administration of the school. Records include student, staff, administrative and financial information. The Office of Community Schools has issued a separate document, "Community School Suspension and Closing Procedures," that describes how records should be handled.

Computerized Attendance Record

If a community school presents a computer printout of attendance, it must have original documents from which the computer printout data was drawn, such as teachers' daily attendance and absence lists, teachers' grade books and student sign-in sheets. If the school provides an absence only list to verify attendance, it must be accompanied by the total class list for that teacher.

If the source of the computer printout data is a teacher personally entering data into the Student Information System, the computer printout itself is the original source document. In such a case, the community school must identify which staff members, including the teacher, have access to the attendance system to make data changes. The school must document in a separate log any changes made by staff members other than the classroom teacher. An example is an office clerk who changes an absence to a tardy based on a late sign-in sheet.

If an office staff member records attendance in a computer, the attendance record of the classroom teacher, which is sent to the office staff member, is the original source document and should be used by the reviewer to verify attendance.

Conflict Resolution Process

One facet of the FTE review includes an examination of the student records that have been flagged by traditional school districts. It is extremely important for traditional school districts and community schools to communicate in a timely, appropriate way in these situations. For additional guidance on flags, see **Error Flags**.

The burden falls on all involved parties to identify problems, communicate the reasons for any concern and to work together to get their concerns resolved before the end of the fiscal year.

The area coordinator's role is one of reviewer, mediator and decision-maker. Neither a community school nor a traditional school district has the right to use the ODDEX system irresponsibly to deliberately report incorrect information or demand unnecessary information. Each district has a right to expect that there is appropriate documentation to confirm accurate enrollment and attendance reporting. Each community school must adhere to all applicable statutory requirements for student enrollment. If the schools cannot resolve issues on their own, it becomes the area coordinator's responsibility to communicate with both parties, verify that the appropriate documentation exists, assure that the data has been entered accurately and, if necessary, visit the school to resolve the issue. After reaching a decision, the area coordinator will communicate that decision to all parties. An area coordinator may direct a school to remove a status flag or modify the student's information, and if a school fails to do so, may report to the Department's community schools payment administrator for possible overrides in the ODDEX SOES. Depending on the circumstances, the coordinator also may report the failure to the director of Office of Field Relations and director of Office of Budget and School Funding for guidance on resolving the issue.

Custodial Pupils/Foster Children

RC 3314.084(B)(1) – *The child's school district of residence, and not the school district in which the home that the child is living in is located, shall be considered the school district in which the child is entitled to attend… (3) – The child's school district of residence shall count the child in that district's formula ADM.*

During the enrollment process, the community school should confirm the enroller's relationship to the child. If there is custody or guardianship, the community school must obtain the legal form and information that identifies the district responsible for educational costs.

District of Residence

For most students, the district of residence is the school district where a child's parent(s) or grandparent reside.

For a student residing in a home (see **Home**), the district of residence is the school district determined by ORC 3313.64 and ORC 3323.01(L), which is where the residential custodial parent resides or resided or the district of residence as determined using the DRC (district of residence change) process. In some situations, a court order will designate a school district as the district of residence. Such a court order will supersede any other determinations.

The district of residence is the school district where an 18-year-old student resides who is supporting himself or herself by his or her own labor or who is receiving government benefits or an inheritance.

For a homeless student residence information see **McKinney-Vento Homeless Assistance Act** section of this manual.

Enrollment in a Community School

Admission and enrollment have the same meaning in this section of guidance — that is, students attend traditional district buildings or community schools where they receive educational instruction and count for funding.

Community schools are public schools of choice, part of Ohio's program of education (ORC 3314). Community schools are required to adopt policies for the admission of students that does one of the following:

- Prohibits the enrollment of students who reside outside the district in which the community school is located;
- Permits the enrollment of students who reside in districts adjacent to the district in which the community school is located; or
- Permits the enrollment of students who reside in any district in the state (ORC 3314.03(A)(19)).

A community school's admission policy also must declare that it is open to any student entitled to attend school under ORC Section 3313.64 or 3313.65; will not discriminate in admission; will not exceed the capacity of the school's programs, classes, grade levels or facilities; and will admit students by lot if the number of applicants exceeds the school's capacity. The only exceptions to admission by lot are that the school will give preference to students who attended the school the prior year or who reside in the district in which the school is located and the school may give preference to siblings of students who attended in the previous year.

ORC 3313.672 specifies documentation that must be provided in the enrollment process. It includes the birth certificate or proof of birth date plus any pertinent court orders. Proof of residency also is needed to establish where a student is entitled to attend school under ORC 3313.64 and 3313.65.

Ohio law addresses different factors such as legal custody, proof of district residence, homelessness, and court ordered placements in determining where a child is entitled to attend school. This can be complicated in individual cases (ORC 3313.084 (B)(1)). The traditional school district where a student is entitled to attend public school is the resident district. The community school should ensure that it is referencing the correct resident district when it enters enrollment information in ODDEX.

Enrollment Reporting

If a community school has proof of residency for a child who previously has been accepted by a public district (**reviewed without error**), that public district must accept that enrollment up to the date it notifies the community school it has verified the child (parent) does not reside at the address listed in ODDEX.

A public district does not have to accept a child's residency at the address given in ODDEX for a date after it verifies* that the child (parent) does not reside at the address being given in SOES and so notifies the community school.

The community school may create a second residency record for a child. The first residency record will have an end date that precedes the date on which the public district notified the community school about the child's nonresidence, and the public district may not flag that record if it previously reviewed the record without error. The public district may flag the second record at the same address as previously reported. The community school is obligated to obtain an updated proof of residency for the child (parent).

If the community school fails to obtain an updated proof of residency for a child within a reasonable period of time (30 days), it may not backdate the child's start date in ODDEX more than 30 days from when the updated proof of residency is eventually obtained.

If the public district reviews an SOES record with an error flag for residency in the fall, or on the initial enrollment of the child, after the beginning of the school year because it has verified* the child does not reside at the address listed in the ODDEX, the public district may continue to impose an error flag for the residency on that record until the community school obtains an updated proof of residency for that child (parent).

If a public district verifies* a child (parent) does not reside at the address listed in ODDEX and imposes the error flag "Documented Challenge" and the community school does not obtain and provide an updated proof of residency for the student, the district may use the error flag of "Documented Challenge." The district should put a note in the comment box that says, "It is assumed that the student's address is not in the district since the community school has not provided an updated proof of residency."

A public district is not obligated to pay for the enrollment of a student in a community school unless the community school notifies the Department of Education within 30 days that it has enrolled a student.

For example, in the spring of a school year, a community school may not open a new residency record for a student with a start date that is in the fall of the school year. The new residency record may go back 30 days, minus vacation time, from the time the community school creates the new residency record. An exception would be the discovery of a court order that necessitates a particular district as responsible for educational costs.

*Verification may not be based on either "the child never enrolled in the district" or "the district never heard of the child."

Error Flags

Traditional public districts have an obligation to protect their district resources. As part of this obligation, a traditional public district must review student data reported by community schools to assure that payments it has made for the enrollment of its students in community schools are appropriate. Districts can view the data in ODDEX/SOES. **Community school students are not required to register at their local districts.**

The community school must obtain proof of residency when it enrolls a child and adopt a policy that prescribes the number of documents required to verify the child's residency. The list of appropriate documents can be seen in the **Proof of Residency** section. For a child authorized to attend school in a district other than the parent's district of residence, the community school should obtain this documentation from a guardian or a court regarding a child's status including guardianship, custodianship or other circumstances authorized under

ORC 3313.64. The school should report as resident district in ODDEX the district that identified as responsible in court documents or Ohio law.

If the resident district has a valid reason to question the address, it must clearly communicate that reason. The community school must attempt to reconfirm the information it obtained during the enrollment process. The community school will ask the parent to provide written document with his or her signature that acknowledges the address provided on enrollment is current and valid and that the student resides with the parent. If the school did not secure acceptable documentation at registration, it must attempt to get some form of written documentation and verify that the information is valid. If the public district verifies that a student does not reside at the address provided by the community school, the community school must give the public district documentation of the student's residency. If a community school does not provide an address, the resident district will not fund the student. Once the community school gives the resident district an address for the student, the district has 75 days to review it and place a flag if necessary.

Most Ohio county auditor's offices have a program that can associate a resident school district with an address. If the community school can find reasonable documentation to confirm the address and or the district of residence, it will advise the resident district that the address is valid, no matter what other information the resident district obtained. While the community school is not required to provide the information to the resident district, it should be encouraged to do so. If the resident district asks for verification of the residential status before removing the flag, the area coordinator may ask the community school to provide that documentation and, if needed, visit the community school to review the documentation. If the documentation is appropriate, the area coordinator will advise the resident school district to remove the flag.

A traditional school district's failure to do so may be reported to the community schools payment administrator for possible overrides in the SOES.

While districts can flag these errors in the SOES, there may be additional errors that must be identified and addressed during the reviews.

E-school

ORC 3314.02(A)(7) – *"Internet-or computer-based community school" means a community school established under this chapter in which the enrolled students work primarily from their residences on assignments in non-classroom-based learning opportunities provided via an Internet- or other computer-based instructional method that does not rely on regular classroom instruction or via comprehensive instructional methods that include Internet-based, other computer-based and non-computer-based learning opportunities unless a student receives career-technical education under ORC 3314.086.*

Foster Children

(See Custodial Pupils/Foster Children)

FTE: Full-Time Equivalency

Full-time equivalency is the portion of the school year a student was educated. It is determined by the number of hours of instruction provided to a student during a school year, divided by the total number of hours of instruction a community school must provide during a school year according to its contract with the sponsor (its annual membership units). These are listed in the community school's annual school calendar in EMIS.

A student's enrollment date, withdrawal date, the calendar he or she is assigned to, and the percent of time are the data points used to calculate a student's FTE. For a student new to a school, the first documented date of attendance starts the clock for calculating FTE. Details on how FTE is calculated in EMIS are available in the EMIS Level 2 Report Explanation: FTE Detail Report.

One FTE at a school is equal to the total hours in the calendar. If the calendar totals 1,200 hours; 1,200 hours is the standard for 1.0 FTE for that school. Every school has a different calendar with different start and end dates, different days off for holidays and breaks, and different numbers of scheduled hours per day. Find the denominator on the school's FTE detail report in the column labeled "**Total for this Cal**" and the numerator in the column labeled "**Total Enroll for this rec**."

A student who enters at the beginning of a school year and receives instruction for the community school's total annual membership units will generate an FTE of 1.0. Students who do not remain for the entire school year or who enter after the start of a school year will have FTEs that reflect the total number of hours of instruction received during the time they were enrolled. No student will be funded for an FTE greater than 1.0. All community schools must offer a minimum of 920 hours of learning opportunities each school year.

All schools must adjust percent of time for students who are attending part time, participating in courses at a joint vocational school district or taking College Credit Plus courses. Also, e-schools and blended schools must adjust percent of time based on the total documented learning opportunities.

GED

ORC 3317.03(E)(5) states that there shall be no state foundation funding for a student who has "a high school equivalence diploma," such as a GED. Such a student may be enrolled but "shall not be included in the enrollment of any school."

Home

Either an institution or residential care facility, as defined in ORC 3313.64(A)(4), or a foster home, group home or a home where the guardian of a student resides.

Home Instruction

If the student has an IEP that requires "home instruction," the school would receive credit for a full week of attendance and instruction if the services were provided per IEP. This position is consistent with practice in traditional public districts.

Instructional Day

A school's contract with its sponsor defines its instructional day. The instructional day: 1) may be the time between when students come in and when students leave or when instruction begins and when instruction ends; or 2) may be accomplishment of specified activities and completion of certain tasks by students who are doing assigned work that is individualized to a single student's program or curricular area of interest.

Instructional Hours/Learning Opportunities

Instructional hours in a community school are defined by learning opportunities provided to or engaged in by a student.

OAC 3301-102-02(M): *"Learning opportunity" means classroom-based or non-classroom-based supervised instructional and educational activities that are defined in the community school's contract and are (1) Provided by or supervised by a licensed teacher; (2) Goal oriented; and (3) Certified by a licensed teacher as meeting the criteria established for completing the learning opportunity.*

A community school is required to define learning opportunities in its contract with its sponsor:

1. It may include both classroom-based and non-classroom-based activities.
2. These activities have to be either directly provided by a teacher or supervised by a teacher; the school should be able to identify the teacher.
3. These activities have to be educational, instructional and goal-oriented; there should be some school policy or guidance that in advance describes the goal, mainly of non-classroom-based activities. Reporting activities after the fact, without prior goals, prior specification of activities and/or teacher direction, is not sufficient.

Instructional hours in a community school's day include time for changing classes but not the recess, breakfast and lunch periods. For students in e-schools, credit can be given within the parameters of ORC 3314.27 and documented according to the parameters for **Learning Opportunity Documentation Requirements for E-schools**. Students can earn credit on evenings, weekends and holidays.

Schools cannot count durational time before the start of the school calendar or after the end of the school calendar. Normally, the Department does not fund summer school. If some students start before the approved start of the school year, the school can choose to set up students on a different calendar with an earlier start date. The exception to this is College Credit Plus.

Students with disabilities may be assigned an intervention specialist to provide additional instruction and support. Schools can count this as classroom time or as a non-classroom-based learning opportunity certified by a teacher. If special education students in an e-school or blended school receive services provided by third-party providers, bills and invoices can be used as source documentation to track time. Schools must use the detailed invoices that show students names, the dates and duration of the services.

Taking part in a credit flexibility activity may count in the instructional hours of a student if the student asks to use credit flexibility and the other procedures associated with credit flexibility are in place, such as goal setting, specification and completion of activities, and review by a licensed teacher.

While e-schools cannot claim funding for absences, schools can count up to 10 hours per day of documented learning opportunities. Nothing prohibits a student from working more than the scheduled day, such as in the evening or on the weekend. However, a student cannot generate an FTE for more hours than the number of hours in the school calendar.

Non-computer, Non-classroom-based Learning Opportunities

Reading, research, completing assignments offline, phone calls with students to discuss coursework, field trips and credit-bearing work experience are examples of non-classroom-based learning activities that a teacher must certify. However, travel time to and from state testing and field trips cannot be included.

Schools should have teachers and students or parents report non-computer classroom time on a regular basis. Schools may use the Alternative Learning Opportunity Documentation Log or something similar as an option to record time not captured by an online system.

Schools may not estimate the time it takes for students to complete tasks. Schools can claim only the verified time a student is taking part in classroom or non-classroom-based learning opportunities. Teachers must certify non-classroom-based learning opportunities.

The area coordinator will determine whether students in brick and mortar schools routinely engage in any non-classroom learning activities, such as the following:

1. May include some out-of-home supervised instruction together with some online instruction; and
2. Only online instruction but not classified as an e-school under the Ohio Revised Code 3314.02 (A)(7).

If students use non-classroom activities, the school must document their participation in learning opportunities per page 14. Whatever type of supporting documentation the community school uses should be noted in the Compliance System. If there are perceived issues, this should be communicated to the Office of Community Schools and to Office of Budget and School Funding. Schools should only receive funding for students' documented and verified time spent engaged in learning opportunities.

If the community school provides only online instruction outside a brick-and-mortar building and is not designated as an e-school, under ORC 3314.02(A)(7), the procedures for providing supporting documentation, as indicated above for "non-classroom activities," would be appropriate.

College Credit Plus (CCP) courses

The rationale for the hours calculation assumes one semester equals half of a school year. Full time for a college student is typically 12 hours a semester, so two semesters can equal 24 hours. Therefore, to calculate one semester hour, the computation is calendar hours divided by 24. If you have a 920-hour calendar, one semester hour would equal 38.3 hours. If a college is on quarters, you would use 36 as the divisor, and for a 920-hour calendar, one quarter hour would equal 25.5 hours.

College Credit Plus is to be entered in the EMIS **FS** record with a **PS** in SENT REASON 1 and SENT REASON 2 (if attending more than one college) and the percent of time the student is enrolled in that program. The result equals the amount of documented time a school can use one hour of College Credit Plus courses a student is enrolled for. For the courses taken over the summer term, the school should add those credit hours into the calculation of the total CCP percent of time for the academic year and then report that percent of time in EMIS. The school does not need to make changes to their EMIS calendar. An example of a student taking six hours of College Credit Plus courses follows.

Hours in school calendar	(A)		922.5
Minimum College Hours for Full time status	(B)		24
One College Credit Hour equals documented time	(C)	(A/B)	38.4
Six hours of CCP	(D)		6
Total documented hours for CCP	(E)	(C x D)	230.6
CCP percent of time	(F)	(E/A)	25

A community school may not count homework or any other work students participate in associated with College Credit Plus classes in the total learning opportunities they provide and account for in the remaining portion (not College Credit Plus) of the student's FTE.

Juvenile Detention Center

ORC 2151.362(B)(5) *If the child is enrolled in an internet- or computer-based community school established under Chapter 3314. of the Revised Code, and provided that the facility possesses the necessary hardware, software, and internet connectivity, permit continued instruction of the child by the internet- or computer-based community school.*

If the facility coordinates the education of the child pursuant to division (B)(1), (2), (3), or (4) of this section, child's school district as determined by the court or the department, in the same manner as prescribed in division (A) of this section, shall pay the cost of educating the child based on the per capita cost of the educational facility within the detention home or juvenile facility.

If the facility coordinates the education of the child pursuant to division (B)(5) of this section, payment for the cost of educating the child shall be made only as provided in division (C) of section 3314.08 of the Revised Code."

If a community school enrollee enters a juvenile detention center, the student must be withdrawn from the community school if the district where the juvenile detention center is located provides educational services at the juvenile detention center and if the child does not continue in a community school's internet/computer-based program. It is possible that a child's district of residence and a community school might agree to have a community school pay the educational costs of the child's enrollment at the juvenile detention center, but this decision must be made jointly between the district of residence and the community school.

Kindergarten Enrollment

The start date entered for an incoming kindergartner shall be the child's first day of attendance. The community school may enroll a child who is not yet 5 years of age as of Sept. 30 if the community school has an early entrance to kindergarten policy for admitting the child and the child met the requirements of that policy. For a child who will not turn 5 years of age until after Dec. 31, the child must have met the requirements of a Department-approved acceleration policy that involves passing the Iowa Assessments.

The community school will receive funding for the student if it has proper early entrance and acceleration policies, per the guidance found here.

The community school must report that the policy is in place in EMIS **DN** record, C_STUEEPOL Student early entrance policy flag.

McKinney-Vento Homeless Assistance Act

The McKinney-Vento Homeless Assistance Act defines homeless children and youths as "individuals who lack a fixed, regular, adequate nighttime residence.[4]

The McKinney-Vento Act requires that students experiencing homelessness be enrolled immediately, even if the student is unable to provide documents that typically are required for enrollment, such as previous academic records, records of immunization and other required health records, proof of residency or other documentation.[5] Moreover, the student must be allowed to attend classes and participate fully in school activities immediately. For additional information about the McKinney-Vento Homeless Assistance Act please refer to the Department's guidance here.

School of Origin or Attendance Area School

Section 3314.11 of the Revised Code establishes the responsibility of the governing authority of a community school to verify the school district in which the student is entitled to attend school. ORC 3314.11(F) specifies that when a student loses permanent housing and is determined McKinney-Vento eligible, the school in which the student is entitled to attend is determined in accordance with ORC 3313.64(F)(13) and the McKinney-Vento Homeless Assistance Act. These provisions specify generally that the student may either continue in the student's school of origin or enroll in a school in the attendance area in which the student is living.[6] Issues involving where homeless students are eligible to attend involve the evaluation of many facts and the application of the McKinney-Vento law. Additionally, there are dispute resolution procedures when there is a dispute over eligibility, school selection, or enrollment. For additional information about dispute resolution procedures please refer to the Department's guidance here.

First Time Enrolling Due to Age

The school must enroll the child in kindergarten immediately and work with the family to obtain acceptable proof of age. Many types of documents can be accepted to prove age, including medical records, baptismal certificates or a simple statement of age signed by the parent or guardian.

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[4] 42 U.S.C. §11434a.

[5] 42 U.S.C. §11432(g)(3)(C).

[6] ORC 3314.64(F)(13); 42 U.S.C. 11432(g)(3)(A).

Proof of Residency

Schools may not require verification or proof of residency as a condition of enrollment.[7] If documents necessary for enrollment are missing, a community school can use forms from the National Center for Homeless Education Homeless Liaison Toolkit and the Sample Housing Information Form.

Flags and Data Reporting Issues

A district may impose an error flag in SOES on a homeless child's record to challenge the child's homeless status. The homeless liaison of the community school should confer with the homeless liaison of the applicable resident district to determine the homeless status of any student in question. While a residency dispute exists, the reviewer or the area coordinator should follow the **Conflict Resolution Process**. Further steps may be taken (for funding purposes), as described in **Error Flags**.

McKinney-Vento Dispute Resolution Procedure

If a dispute arises over eligibility, school selection, or enrollment, the community school must immediately enroll the homeless student in the school in which enrollment is sought, pending final resolution of the dispute, including all available appeals (McKinney-Vento Homeless Assistance Act, Section 722(g)(3)(E)(i)). The dispute resolution policy should also consider that the statutory definition of "enroll" and "enrollment" includes attending classes and participating fully in school activities (See section 725(1)). Homeless families and youths may be unaware of their right to challenge placement and enrollment decisions. Therefore, the community school must provide the parent, guardian, or unaccompanied youth with a written explanation of any decisions related to school selection or enrollment made by the school, the community school involved, along with a written explanation of the appeal rights (Section 722(g)(3)(E)(ii)). The community school must refer the unaccompanied youth, parent, or guardian to the local liaison, who must carry out the dispute resolution process established by the Ohio Department of Education as expeditiously as possible (Section 722(g)(3)(B)(iii)). The local liaison should assist the child and family in preparing the appeal and should make the resources of the school (e.g., copying, mailing, or obtaining records) available to the parent, guardian, or unaccompanied youth.

No Show

Students considered to be "No Shows" are those who:

1. Enrolled and were expected to attend but did not attend even one day or never logged in to an e-school's instructional program after the start of a school year; or
2. Were enrolled through the end of the prior school year, were expected back in the fall but never attended or logged in after the start of the new school year.

If it cannot be documented that the pupil attended at least one day or, in the case of an e-school, logged in to the system, the pupil will not be considered as enrolled in that school year.

A new student who enrolled before the start of a school year but did not come to school for at least one day or, in the case of an e-school, logged in to the system, should be withdrawn with a withdrawal reason code of 81 in EMIS.

A student who was enrolled last school year, was expected to return in the fall and for whom no enrollment elsewhere is known in the new school year may be given unexcused absences for up to 72 consecutive hours after which the student must be withdrawn with a withdrawal reason code of 76 in EMIS. No attendance is recorded, and no payment can be made for the student.

[7] 42 U.S.C. §11432(g)(3)(C).

ODDEX (Ohio District Data Exchange)

Ohio District Data Exchange (ODDEX) is the primary application resident districts and community schools will use for data verifications and exchanges (such as SOES, SCR, History, Calendars and CCP).

Original Source Documents

Different sets of documentation are reviewed during the FTE review process for active and inactive students:

- Birth records, court orders relating custody and guardianship, proof of current residency;
- Enrollment records;
- Withdrawal records;
- Student credit flexibility plan;
- Computer distribution records (e-schools); and
- Attendance records.

The original source document for birth record may be a photocopy of a birth certificate or a properly attested documentation of birth. A court order which is still in effect that designates either a custodial parent, a custodian, or a guardian can be the original source document to identify a child's resident district. The **Proof of Residency** section lists the documents which are acceptable to verify proof of residency.

The original source document for enrollment is the enrollment application, either online or hard copy.

A completed withdrawal form signed by a parent or responsible adult, records request from another district, the SOES printout showing the student enrolled in another district or a letter indicating a withdrawal due to 72-hours of consecutive unexcused absences can be used as original source documents to verify withdrawal.

For computer distribution, the original source documents are the computer distribution forms signed by the parent or responsible adult and/or delivery service tracking records.

Each student credit flexibility plan should be current for the school year and meet the requirements outlined in this guidance. Additionally, there should be a defined curriculum with a defined set of tasks and a number of hours for the completion of tasks. Attendance should be documented by weekly progress reports that delineate the completion of tasks and the number of hours in which the student was actually engaged in learning opportunities.

The original source documents for attendance are the teacher attendance rosters or grade books, teacher class lists, sign-in sheets, log-in records, learning opportunity documentation records or other documents on which the student's attendance is recorded by the person who sees the student daily. A sign-in sheet must include both a "Time In" and a "Time Out." For e-school students and blended learning students, see the **Documentation of Learning Opportunities for E-schools** and **Documentation of Learning Opportunities for Schools with Blended Learning Models** sections in this manual.

The documentation presented to prove attendance must indicate attendance, not just absences. Absence reports usually encompass the school's entire calendar year and do not prove attendance if they do not indicate a start date or an end date for a student who enters the school after the school year has begun or withdraws before the end of the school year. A Student Information System generated report is not adequate proof of attendance if it gives only absences and not entry and withdrawal dates.

The area coordinator has the discretion to determine what will be appropriate documentation of instruction and attendance and what other documentation is needed as original source documents.

Part-time Student

The maximum amount of time a student can generate is 1.0 FTE. If a student only is enrolled in one or two courses, the school should adjust the student's percent of time to reflect the level at which the student is participating.

Percent of Time

The percent of time is critical to use in e-schools and schools using blended learning models. It also must be used in brick and mortar schools where the student is attending part time or participating in courses at a joint vocational school district or participating in College Credit Plus courses.

For example, if a student is enrolled for the full year at an e-school (with a reported calendar of 920 hours) and has 736 hours of documented learning opportunities, the percent of time for the student should be reported as 80 percent (736/920 = 0.8), and the student would generate 0.8 FTE.

Similarly, if a student is enrolled for half the year at an e-school (460 hours possible) with 230 hours of documented learning opportunities, the percent of time for the student would be 50 percent (230/460 hours maximum in calendar), and the student would generate 0.25 FTE.

For example: *(50 percent of time) x (460/920) = 0.25* **Simplified:** *.5 x .5 = .25*

Some students have multiple records on the FTE detail report because of the change in economic disadvantagement, residency, special education code and/or other reasons.

E-schools and blended schools must calculate and report different percent of time for each of the records for the same student based on the start and end dates of each of those records.

E-school and blended school example templates and instructions for percent of time calculation are available on the Community School Funding Information webpage.

Percent of Time – Withdrawn Student E-school Examples

Example 1 – For a student that has withdrawn, the calculation is as follows:

- The numerator is the number of documented learning opportunities from computer and non-computer sources.
- The denominator is the total number of hours possible based on specific enrollment.
- The calendar is 7 (hours per day) x 180 (calendar days) = 1260 hours per year.
  1260 hours = 100% = 1.0 FTE
- A student is enrolled for 10 days (7 hours per day) and 50 total hours are documented.
- The equation would be 50/70 = 71.4%; therefore, the *percent of time* needs to be adjusted in EMIS to **71 percent** on withdrawal.
- This percent of time factor, when applied, will change the funded FTE from **.06** (70 hours for 10 days of enrollment divided by 1,260 total calendar hours) to **.04 FTE**.
  Equation Examples: *0.06 x .714 = .04* **Simplified** *50 hours/1260 hours = .04*

Example 2 – A student enrolls, logs in for one day (for 7 hours) and then has 72 hours of consecutive unexcused absences:

- The numerator would be the number of documented learning opportunities.
- The denominator would be 72 hours + one day of attendance (7 hours).
  Example: *72 + 7 = 79*
- The fraction would be 7/79.
  Equation Example: *7/79 = .0886*
- The *percent of time* is 9 percent on withdrawal.
- This percent of time factor, when applied, will change the funded FTE from **.06** (79 hours divided by 1,260 total calendar hours) to **.005 FTE**.
  Equation Examples: *0.06 x .0886 = .005* **Simplified** *7 hours/1260 hours = .005*

Preschool Students

Community school students are permitted to have preschool students; however, preschool students do not generate foundation funding. If a community school has preschool students, the school's contract must authorize this.

Proof of Residency

A community school must have an enrollment policy adopted by the governing authority that prescribes the documents and the number of documents required to verify a student's residency. The community school must obtain proof of residency when it enrolls a child per that policy. ORC 3314.11 requires community schools to review the residency records monthly and verify to the Department students' residency upon enrollment and annually. Best practice suggests community schools have policies in place that provide for the collection of residency documentation annually. The Office of Community Schools has provided additional guidance found here.

The school should confirm that the information included in the documentation agrees with what it has entered in the ODDEX system. This documentation must be current and may include the following:

- A deed, mortgage, lease, current home owner's or renter's insurance declaration page, or current real property tax bill;
- A utility bill or receipt of utility installation issued within ninety days of enrollment;
- A paycheck or paystub issued to the parent or student within ninety days of the date of enrollment that includes the address of the parent's or student's primary residence;
- The most current available bank statement issued to the parent or student that includes the address of the parent's or student's primary residence;
- Documented affirmation of address of student's parent(s) from district of residence where parent(s) currently resides;
- Notarized affirmation from parent(s) or student(s) if over 18-years of age of current residence address;
- USPS return receipt from certified letter sent to parent(s) by district of residence;
- Written confirmation from the Department of Job and Family Services of current address of the parent(s); or
- Written confirmation from a local law enforcement agency of the current address of the parent(s).

An example of inappropriate documentation is a driver's license or voter registration, since the student's residence may change but not yet be reflected on the driver's license or voter registration.

Schools are required to create policies to determine how they will verify enrollment on an annual basis. Annual verification may include parents' submission of a residency form that features a verification of residency and parent signature section. The school's residency verification policy also can include annual collection of proof of residency documents.

Suggested best practices may include:

- Sharing the policy with your students' resident school districts;
- Establishing and maintaining good working relationships with resident districts;
- Monthly reminders to parents to contact the school if they move;
- Clarifying the rights of homeless students and reinforcing the requirement that students who are homeless (including students who are sharing the housing of another person (doubled up) due to loss of housing, economic hardship or similar reason) cannot be denied enrollment;
- Collecting proof of residency as part of the school's re-enrollment process. Schools also may ask parents/guardians to affirm (with a signature) the address reported is true and accurate;
- Instituting a policy where the school performs a monthly residency check on a sample of students in addition to other verification procedures.

If a challenge is raised, the community school is required to provide to the district indicated in ODDEX as the resident district the proof of residency collected during the enrollment process or the latest proof of residency that it has obtained.

Community schools are separate, legal entities and have their own admissions and enrollment policies; they are not legally required to collect those proofs of residency asked for by the student's district of residency in its enrollment policy. The community school's proof of residency requirements supersede those of the traditional public district where the child resides. If a public district requires more than one proof of residency, a community school may obtain only one proof of residency if that is what is stated in its policy.

If a student's family moves during a school year, the community school must obtain a proof of residency for the new address. The original district may not place an error flag on the student's record in SOES for a start date that is before its confirmation of the family's move, although the new district may place an error flag on the student's SOES record challenging the residency of the student if it verifies that the child/family does not reside at the address listed in ODDEX or until it receives a new proof of residency in that district.

If a community school student is 18 years of age or older, it must be determined whether he/she is self-supporting or non-self-supporting (homelessness is addressed separately under McKinney-Vento Homeless Assistance Act). If the student is self-supporting, the student is entitled to enrollment in the district where he or she is residing (see definition of **18-year-old Living Apart from Parent**). If the student cannot prove that he or she is self-supporting, the student is non-self-supporting and entitled to enrollment in the district where the residential custodial parent resides. For the non-self-supporting student, the latter is the student's district of residence in ODDEX/SOES.

Each traditional school district and each community school is responsible for applying its own enrollment policy to students attending school in the resident district or community school. If there are differences regarding proof of residency, the policy of the traditional district or community school in which the student is enrolled prevails. For example, if district A is the resident district for a student and the student enrolls in a community school with an admission policy that permits enrollment from district A, district A must accept the documentation required by the community school's admission policy as sufficient for establishing that the student is entitled to lawfully enroll in the community school.

The Department, traditional districts and community schools all have an obligation to assure the law is followed in each particular case. Traditional school districts and community schools have valid reasons for investigating residency issues that may involve more than the "standard" proof of residency, and cooperation from all parties is desired. It is not acceptable to "flag" students as non-residents unless the resident district **can document information** to dispute the residency determination of the community school. If the district of residency has a valid reason to question the address, it must clearly communicate that reason to the community school and request the community school provide the district a copy of documentation of the student's residency. The community school must work to confirm the information it obtained during the enrollment process. As part of the process, the community school should request that the parent provide written confirmation, including the parent's or guardian's signature, that acknowledges the address provided during enrollment is current and valid and the student resides with the parent. This information should then be provided to the district of residence. If the community school refuses to provide the proof of residency, the resident district can flag the student's record in SOES.

The Department's area coordinators are available to assist with district residency determinations. If a disagreement still exists, the community school may present the matter to the superintendent of public instruction for a final determination.

Examples of appropriate proof of residency for verification of student's entitlement to attend either a community school or a traditional school district building are listed in Ohio law cited above. These items must be current and include a street address; a P.O. Box address cannot be used to validate residency records.

The Department advocates cooperative relationships and open lines of communication between community schools and resident districts to ensure all Ohio's students are well prepared for academic success in our 21st century learning environments.

Transportation note:

Establishing residency for transportation is different in that proof of residency for transportation purposes follows that of the resident district's policy. Resident districts may require the same proof of residency from community school students as required of students attending the traditional district's schools.

Residential Care Facilities, Pupils Residing in

Section 265.410 of H.B. 166: A community school established under 3314 of the Revised Code that was open for operation as a community school as of May 1, 2005, may operate from or in any home, as defined in section 3313.64 of the Revised Code, located in this state, regardless of when the community school's operations from or in a particular home began.

For special education services to be provided to residents of a home, the parent or surrogate will decide whether services are to be provided by the public district or the community school.

School Options Enrollment System (SOES)

The School Options Enrollment System (SOES) application is used by community schools, STEM schools and resident districts for determination of student enrollment and residency. This system allows resident districts to review the residency of students being reported by community and STEM schools. Districts and schools can use it to determine whether a student is truly a resident of the district and approve or set contention flags. The application allows the community and STEM schools to view a resident district's comments and flagging values. In addition, any Department involvement for a particular student is visible to all districts associated with the student's SSID.

Information about the School Options Enrollment System being populated by EMIS can be found in the EMIS Manual.

School Options Enrollment System Records, Mandatory Adjustments of

There are instances where, after the conflict resolution process has been concluded, mandatory adjustments of ODDEX records are necessary. These instances usually occur when a traditional public district will not remove an error flag or when a community school will not correct a date in the School Options Enrollment System such as an IEP date or a student's withdrawal date. In such instances, the area coordinator will contact the community schools payment administrator; give only the SSID number(s) involved and the circumstances necessitating a correction.

Student Cross Reference (SCR)

The Student Cross Reference (SCR) application is to be used by all EMIS reporting entities to verify enrollment for funding. Within the Student Cross Reference, districts will see records for students they have submitted data for. When conflicts are determined, any district linked to the conflict also will be able to see the student, even if the district did not submit any data for the student. The ability to view these students may be removed when the conflicts are resolved.

When data is submitted to the Student Cross Reference and that data is loaded for viewing, rules will be run against the data checking for enrollment conflicts. If any conflicts are found, these are recorded and districts are notified on their Student Cross Reference landing pages. As new data is submitted for conflicts identified and then resolved, the records may move to new columns on the landing page.

Site-Based Community School

A site-based community school is a community school where its students receive instruction in a brick-and-mortar facility. A brick-and-mortar facility is defined as a school having physical location specified in the contract with sponsor that students are expected to attend pursuant to the school calendar.

Special Education

Community schools receive weighted special education funding for the part of the school year for which a child with a disability has a current IEP and ETR. To verify funding, the community school will need to provide a copy of the ETR and the IEP for each student with a disability. If both documents are not provided, additional investigation will be needed by the Department.

The area coordinator must verify that, for the newly identified special education students, the SpEd FTE Start Date reported in EMIS is the date when the parent signed the initial IEP giving a consent for the services. The SpEd FTE Start Date on the FTE Detail Report can be a later date when the services started if the services did not start on the day of parental consent.

In cases when the student's disability was changed during the school year, the area coordinator should verify that there is a Consent to Assess (PR-05) form signed and dated by the student's parent.

During an FTE review of special education records for the students in the sample, the area coordinator does not have to verify that re-evaluation ETRs and IEPs have parent signatures or multiple attempts have been made to contact the parents to obtain the signatures.

The area coordinator verifies that the disability condition and funding category code are correctly reported in EMIS. The disability condition can be found in section 4 of the ETR. Because a disability condition code is not always listed, below is a description of conditions matched to their funding category code.

Disability Condition	Spec Ed Cat Code	Description of Condition
1	5	Multiple Disabilities (other than Deaf-Blind)
2	6	Deaf-Blindness
3	3	Deafness (Hearing Impairment)
4	4	Visual Impairments
5	1	Speech and Language Impairments
6	5	Orthopedic Impairments
8	3	Emotional Disturbance (SBH)
9	2	Intellectual Disabilities
10	2	Specific Learning Disabilities
12	6	Autism
13	6	Traumatic Brain Injury (TBI)
14	4	Other Health Impaired (Major)
15	2	Other Health Impaired (Minor)
16	2	Developmental Delay (preschool only)

Electronic ETRs and IEPs are satisfactory if they are on a secure server that is accessible to authorized personnel.

If an IEP is generated, either in a public district or a community school and then modified at a later date in another community school, the effective date for the IEP depends on the circumstances:

a) If the community school convenes an IEP team and determines that either a significant portion or the entire document needs to be changed, the date of the IEP changes to the date the IEP is modified. This change must be entered in EMIS;
b) If the community school convenes an IEP team and either accepts the IEP "as is" or makes minor changes, the original date stands.

The best way to determine what occurred is to review the ODDEX record.

If, during the FTE review, the reviewer discovers a student is receiving "home instruction," the reviewer would ask to see the IEP. If the instruction is being provided in the home, but "home instruction" is not in the IEP, the school would get credit only for the number of hours of service provided. If the student is on "home instruction" and "home instruction" is not reflected on the child's IEP, the school should not receive funding. If the "home instruction" is reflected on the child's IEP and the services are provided fully per the IEP, the full funding is warranted.

Start Date/From Date

ORC 3314.08(H)(2) – *A student shall be considered to be enrolled in a community school for the period of time beginning on the later of the date on which the school both has received documentation of the student's enrollment from a parent and the student has commenced participation in learning opportunities as defined in the contract with the sponsor, or thirty days before the date on which the student is entered into the education management information system established under section 3301.0714 of the Revised Code.… Any student who completed the prior school year in an internet or computer-based community school shall be considered to be enrolled in the same school in the subsequent school year until the student's enrollment has ceased as specified in (H)(2) of this section….However, if the student without a legitimate excuse fails to participate in the first seventy-two consecutive hours of learning opportunities, the student shall be considered not to have reenrolled in the school for that school year…*

The entry date is the student's first day of instruction. Per ORC 3314.08(H)(2), the start date in ODDEX is either:

a. The first day a student participates in learning opportunities (not an orientation or state assessments day);
b. The date a parent signs an application, if it is after a.

The entry date listed in the ODDEX system cannot be a date that is more than 30 days before the date the student record was entered in the ODDEX system.

The entry date for a new e-school student is determined by when the school has received proper enrollment documentation, all required hardware and software have been provided by the school, all such materials are operational and the student has commenced learning opportunities. Verification that the necessary equipment has been provided will be checked during the on-site FTE review. To assist with establishing the proper entry date, the reviewer also will verify that the student has logged in to the system.

Total Membership Units

Total membership units are the number of days or hours of instruction that the community school will provide during a school year, as indicated in its contract with the sponsor.

Truancy

Refer to **Habitual truancy, excessive absences, chronic absenteeism** section of this manual and information about HB 410.

Withdrawal/End Date

ORC 3314.08(H)(2) *–… A student's enrollment shall be considered to cease on the date on which any of the following occur: (a) The community school receives documentation from a parent terminating enrollment of the student; (b) The community school is provided documentation of a student's enrollment in another public or private school; (c) The community school ceases to offer learning opportunities to the student pursuant to the terms of the contract with the sponsor or the operation of any provision of this chapter.*

The withdrawal date is the last day of a student's attendance or of the days to be counted. While no more than 72 hours of unexcused absence may be used in determining the "End Date," a partial day of attendance in meeting the 72-hour requirement is possible (see **72 Consecutive Hours of Unexcused Absence Rule**).

If a student is suspended and learning opportunities are not provided and then the student is expelled when the suspension ends, the end date is the last day when learning opportunities were provided to the student — the 72-hour rule does not apply in this situation. If a community school enrollee enters a juvenile detention center, refer to **Juvenile Detention Center** section.

The end date for a student is the earlier of:

1. The date when the parent withdrew the child; or
2. The date the community school receives a request for records from another school; or
3. The date before the student began attending another school; or
4. The date on which the student's 72^{nd} consecutive hour of unexcused absence occurred.

The last day that the child attends or is enrolled is reported in EMIS as the withdrawal date.

If the child re-enrolls in another community school or in the traditional public district, the withdrawal date shall be the day before the first day of school in the newly enrolled school. If the child does not enroll in another community school or in the traditional public district and the parent (or the student if he or she is self-supporting) has not advised the school that the student will be withdrawing, the community school must unenroll the student on the day that represents 72 hours of unexcused absence. No more than 72 hours is permissible, even if the last day of enrollment is a partial day, so as not to exceed 72 hours.

The acceptable kinds of withdrawal documentation include the following:

- Signed withdrawal form;
- Documentation of notification from a Department system that the student has enrolled in another Ohio district;
- Records request (hardcopy or electronic);
- Form or a letter or attendance documentation of 72 hours of unexcused absences.

Work Study Hours and Funding

Community school students in work-based learning experiences, as defined here, may be eligible for school credit. This work experience and transcripted credit also may count toward that student's instructional hours.

To award credit for work-based learning by utilizing credit flexibility, each student, the student's family, the school and business partner create the work-based learning agreement and credit flexibility plan together. Work-based learning experiences are designed to provide authentic learning experiences for students that link academic, technical and professional skills. Business and education partners work together to evaluate and supervise the experiences, which must be documented with learning agreements and evaluation forms. Local schools may have additional guidelines for these work-based learning experiences concerning eligibility, required competencies or credit granted. The credit flexibility plan, based on the local school's requirements, typically includes an application for credit and outlines information on the course, how much credit the student is seeking and how the student will demonstrate competency in subject areas, which should directly align with the work-based learning agreement.

The Ohio Department of Education has a downloadable Work-Based Learning Agreement that may be customized based on local policies to showcase student learning to be eligible for credit according to the district's policy on credit flexibility.

Community schools may count up to 120 hours per transcripted credit of student work experience toward their minimum of 920 required instructional hours. For example, a work-based learning experience at an animal hospital can be designed to align to science course standards. A credit flexibility plan can outline the credit to be issued to the student on demonstration of competency of those standards.

Scenario A: A student works 90 hours at an animal hospital and demonstrates competency of the science standards, as written in the work-based learning agreement and credit flexibility plan, resulting in one credit of science. The community school counts the 90 hours the student worked as part of the student's 920 instructional hours.

Scenario B: A student works 150 hours at an animal hospital and demonstrates competency of the science standards, as written in the work-based learning agreement and credit flexibility plan, resulting in one credit of science. The school only counts 120 hours the student worked as part of the student's 920 instructional hours.

See information about:

- **Work-Based Learning**
- **Apprenticeships and Internships**
- **Credit Flexibility**
- **Career-Based Intervention (CBI)**

To count employment hours toward meeting the 920-hours requirement, the school must have a policy that outlines how the school implements the work-based learning. Each student participating in the program should have an individual student plan and documentation of work-based experience (pay stub, journaled hours). The e-schools must ensure that participation requirements are met before applying the limitation in ORC 3314.27. (No student enrolled in an internet- or computer-based community school may participate in more than 10 hours of total learning opportunities in any period of 24 consecutive hours.)

Appendix

Communication to a New Community School Before an Orientation Visit

Suggestions for a Virtual CS FTE Review

E-school and Blended School FTE Review Guiding Questions

McKinney-Vento Sample Housing Information Form

FY21 Community School FTE Review Survey – Brick and Mortar School

FY21 Community School FTE Review Survey – E-school and Blended School

Compliance System Navigation Directions

Communication to a New Community School Before an Orientation Visit

The area coordinator should email the following message to the new community school to announce an orientation visit:

This is to confirm that I will be visiting your community school for an orientation visit on:

Date: ___________________________________

Time: ___________________________________

During the orientation visit, I plan to address the following:

1. The school's annual calendar as reported in EMIS against the actual operating calendar;
2. The school's reporting in hours and the effect on the calculation of the FTE:
3. The role of FTE Adjustment Report and how the school can use it;
4. Flagging and modification procedures;
5. The role of the area coordinator in general and in the resolution of flags;
6. Funding timeline and payment reporting;
7. ETRs and IEPs, disability conditions and corresponding funding category codes;
8. The FTE review process and the use of the Compliance System;
9. Original source documents for documenting attendance;
10. Calamity days and make-up days;
11. Written enrollment and attendance policies;
12. Credit flexibility; kindergarten early entrance and/or acceleration policies, if applicable;
13. Use of the EMIS Manual, as necessary;
14. HB 410 (habitual truancy, excessive absences, chronic absenteeism);
15. Residency verification process;
16. If a high school, College Credit Plus and career-technical education funding; and
17. Any questions that you may have.

I invite you to include in the visit any available staff members who are involved in these procedures.

Suggestions for a virtual CS FTE Review

Upload the following documents into the Compliance system as soon as possible:

- Copy of the contract with the school's sponsor (or a link to the contract on the Department's website);
- The community school's written enrollment and attendance policies/procedures;
- Board-approved kindergarten early entrance policy and/or acceleration policy, if applicable;
- Credit flexibility policy, if applicable;
- Board-approved school "operating" calendar;
- Description of methodology of how time is claimed for funding (e-school and blended school only).

Consider the following:

- Test your computer to see if you are able to use MS Teams or Skype. Can you share your screen?
- Do you have the documents below in electronic format?
- Are you able to scan the documents below and organize them as suggested?
- If your documents are in the paper form, do you have a projection system that could project the paper document on the computer screen to be shared during the meeting?

1. Organize student files in the same SSID order as they are in the sample.
2. Provide a match between student name and the SSID.
3. Have these documents available for all active and inactive students:
    a. Enrollment form
    b. Birth record
    c. Proof of residency
    d. Withdrawal form signed by parent or request for records form
    e. Student credit flexibility plan
    f. Special education documents:
        i. Current ETR(s)
            1. Front page showing dates
            2. Section IV showing the disability
            3. Signature page (only for newly identified students)
        ii. Current School Year IEP(s)
            1. Front page showing dates
            2. Signature page (only for newly identified students)
        iii. Consent to Assess (PR-05) form showing parent signature for any disability change during the school year
    g. Attendance Records that show student's first and last day. Pay special attention to students who start at the school after the beginning of the school year and/or are withdrawn before the end of the school year.
4. Review the operational and EMIS calendars. Update the EMIS calendar as needed prior to the review.
    a. Does the calendar have the minimum number of required hours (920)?
5. E-school and blended school only: present TLOR for students in the durational sample and supporting documentation of documented learning opportunities.

If you have any questions, please feel free to contact your area coordinator.

E-school and Blended School FTE Review Guiding Questions

One important part of the FTE review in the blended and e-schools is to understand the method the school uses to document, count and claim participation time for funding.

How does the school define the following:

- Participation;
- Attendance;
- Online time;
- Classroom time;
- Non-classroom -based learning opportunity.

What types of systems and/or vendors does the school use for durational time for the following:

- Computer;
- Classroom;
- Non-classroom -based learning opportunities.

Online hours:

- How does the school define time spent on the computer?
- How does a vendor present the durational data to the school?
- Are there login and logout times for each durational increment?
- Does a vendor show durational data in aggregate for the entire year?
- What time zone does the vendor present the reports in? If not in EST zone, does the school convert the start and end times to the EST?
- How does the school define activity? Does the school count Time on Activity (some vendors provide total time logged in and then Time on Activity)? What causes the activity timer to continue running?
- Does the school have "forced" log out times? In other words, how does the school or vendor handle a student who doesn't show any activity? How long does the school allow, 15 minutes, 30 minutes? How did the school determine the forced log out time? Is the forced log out time included in the durational interval?

Non-classroom-based hours:

- What does the non-classroom-based learning opportunity documentation look like (start and end of activity, description of activity, hours and minutes spent on the activity)?
- How does the school monitor attendance by each student for the duration of activity?
- Who reports the non-classroom-based hours (students, parents, teachers)?
- Are offline hours certified by a teacher? How often?
- Do teachers question the hours reported by students if they appear to be too many or too few? Do teachers review the activities indicated by students?
- What process does the school use to determine which activities count toward funding?
- Does the school count student employment hours toward funding? How is that documented? Are the employment hours in line with the approved work based learning programs (career-based intervention, apprenticeship or mentorship programs)? Does the student have an Individual Academic and Career Plan?

Classroom time:

- What are the school's expectations for student's attendance in the classroom? How many hours a day? How many days a week?
- How does the school take attendance for this time (every period, start and end of the school day)?

Combining online, non-classroom-based and classroom time:

- What is the process school uses to combine all different types of hours?
- How does the school ensure that it does not count duplicated time?
    - Two online systems;
    - Online and non-classroom-based time;
    - Online and classroom time.
- For vendors that submit only aggregate annual time, how does the e-school ensure there is no duplication or exceeding of the 10-hour limit?
- How does the e-school apply the 10 hours per day cap?
- How does the e-school define 24 consecutive hours to apply to 10-hour cap? (midnight to 11:59 p.m.)
- Are there families in which two or more siblings share a computer? How does the school track online time for them?

McKinney-Vento Sample Housing Information Form

SAMPLE HOUSING INFORMATION FORM

Your answers will help determine if the student meets eligibility requirements for services under the McKinney-Vento Act.

Student ______________________________ Parent/Guardian ____________________________

School ___________________________ Phone _______________________________

Age _____ Grade _____ D.O.B. ___________

Address ____ City ________________

Zip Code ________________ Is this address Temporary or Permanent? (circle one)

Please choose which of the following situations the student currently resides in (you can choose more than one):
_____ House or apartment with parent or guardian
_____ Motel, car, or campsite
_____ Shelter or other temporary housing
_____ With friends or family members (other than or in addition to parent/guardian)

If you are living in shared housing, please check all of the following reasons that apply:
_____ Loss of housing
_____ Economic situation
_____ Temporarily waiting for house or apartment
_____ Provide care for a family member
_____ Living with boyfriend/girlfriend
_____ Loss of employment
_____ Parent/Guardian is deployed
_____ Other (Please explain)

Are you a student under the age of 18 and living apart from your parents or guardians? Yes No

Housing and Educational Rights

Students without fixed, regular, and adequate nighttime residences have the following rights:

1) Immediate enrollment in the school they last attended or the local school where they are currently staying even if they do not have all of the documents normally required at the time of enrollment without fear of being separated or treated differently due to their housing situations;
2) Transportation to the school of origin for the regular school day;
3) Access to free meals, Title I and other educational programs, and transportation to extra-curricular activities to the same extent that it is offered to other students.

Any questions about these rights can be directed to the local McKinney-Vento liaison at [Insert phone number] or the State Coordinator at [Insert phone number].

By signing below, I acknowledge that I have received and understand the above rights.

____

Signature of Parent/Guardian/Unattached Youth *Date*

____

Signature of McKinney-Vento Liaison *Date*

FY2021 CS FTE Review Survey - Brick and Mortar School

Section : School Information and Calendar Question Count : 2
Question 1 Is this school ☐ Closing/Closed ☐ Suspended
Question 2 Compare a copy of the school calendar reported to EMIS and the officially adopted school calendar. The calendars must match.
Section : Policies and Contract Question Count : 4
Question 1 Review the community school - sponsor contract. Does the school contract approve the school to use a blended learning model? ☐ Yes ☐ No Does the school, in practice, use a blended learning model? ☐ Yes ☐ No If any of the answers is **Yes - STOP** filling out the survey and contact ODE Office of Budget and School Funding representative to load the E-school and Blended School Survey.
Question 2 Review the enrollment and attendance policies and/or procedures. Add a comment if any issues are identified.
Question 3 Review the community school's adopted early entrance student policy for advanced learners. Add a comment if any issues are identified.
Question 4 Review the community school's adopted credit flexibility policy. Does the school have any students who are participating in credit flexibility? ☐ Yes ☐ No Add a comment if any issues are identified.

FY2021 CS FTE Review Survey - Brick and Mortar School

Section : Student Enrollment Documentation and Attendance Question Count : 2

Question 1
Review the files for the SSIDs selected in the sample. Each student record file in the sample must contain:

- birth record
- proof of residency
- an enrollment form
- a withdrawal documentation, if applicable.

SSID	Birth Record	Proof of Residency	Enrollment Form	Withdrawal Documentation	Action
	--	--	--	--	

Question 2
Do the attendance documents support the Start Dates and End Dates listed in the FTE Detail Report?

SSID	FTE Start Date	FTE End Date	Action
	--	--	

* In the box below describe the original source documents that verify attendance:

Section : Special Education Records Question Count : 1

Question 1
For the students with disabilities in the sample check the validity of the data for funding purposes.
A student is eligible for special education funding if:
1. The ETR lists the disability of the student and current.
2. The IEP is in effect for the current school year.
3. The disability designation (In EMIS) matches the disability on the ETR.
4. The initial IEP is signed.

SSID	ETR is Current	IEP is Current	Student Disability is Properly Reported in EMIS	Initial IEP has parent signature or equivalent	Initial IEP start date is properly reported in EMIS	Action
	--	--	--	--	--	

FY2021 CS FTE Review Survey – E-School and Blended School

Section : School Information and Calendar Question Count : 2
Question 1 Is this school ◻ Closing/Closed ◻ Suspended ◻ Blended ◻ E-school
Question 2 Compare a copy of the school calendar reported to EMIS and the officially adopted school calendar. The calendars must match.
Section : Policies and Contract Question Count : 4
Question 1 Review the community school - sponsor contract. Add a comment if any issues are identified.
Question 2 Review the enrollment and attendance policies and/or procedures. Add a comment if any issues are identified.
Question 3 Review the community school's adopted early entrance student policy for advanced learners. Add a comment if any issues are identified.
Question 4 Review the community school's adopted credit flexibility policy. Does the school have any students who are participating in credit flexibility? ◻ Yes ◻ No Add a comment if any issues are identified.

FY2021 CS FTE Review Survey – E-School and Blended School

Section : Student Enrollment Documentation and Attendance Question Count : 3

Question 1
Review the files for the SSIDs selected in the sample. Each student record file in the sample must contain:

- birth record
- proof of residency
- an enrollment form
- a withdrawal documentation, if applicable.

SSID	Birth Record	Proof of Residency	Enrollment Form	Withdrawal Documentation	Action
	--	--	--	--	

Question 2
Do the attendance documents support the Start Dates and End Dates listed in the FTE Detail Report?

SSID	FTE Start Date	FTE End Date	Action
	--	--	

* In the box below describe the original source documents that verify attendance:

Question 3

* a). Is there an accounting of hours of online-system based learning opportunities for the sampled student records?
☐ Yes ☐ No
If yes, document the total amount of time by SSID in an ODE template.

* b). Is there an hourly/daily/weekly accounting of "Other Learning Opportunities"?
☐ Yes ☐ No
If yes, document the total amount of time in an ODE template for the same students.

* c.) If yes to question b, does it meet the documentation requirements outlined in the FY20 CS FTE Review Manual including the certification requirements?
☐ Yes ☐ No

* d.) Request the school upload the Total Learning Opportunity Records (TLOR) within 5 business days of the completion of the FTE Review. Was this requested?
☐ Yes ☐ No

* e.) Did the school send the TLOR per 3d?
☐ Yes ☐ No

* f.) By SSID, compare the calculated percent of time from 3e against the percent of time reported in the most recent FTE Detail Report. Do the percent of time match?
☐ Yes ☐ No

* g.) By SSID, compare the percent of time calculated from the sample in 3b against the corresponding percent of time in 3e. Do they match?
☐ Yes ☐ No

* h.) Did the school upload the description of the methodology of how the school totals the durational time for funding purposes?
☐ Yes ☐ No

FY2021 CS FTE Review Survey – E-School and Blended School

Section : Special Education Records Question Count : 1

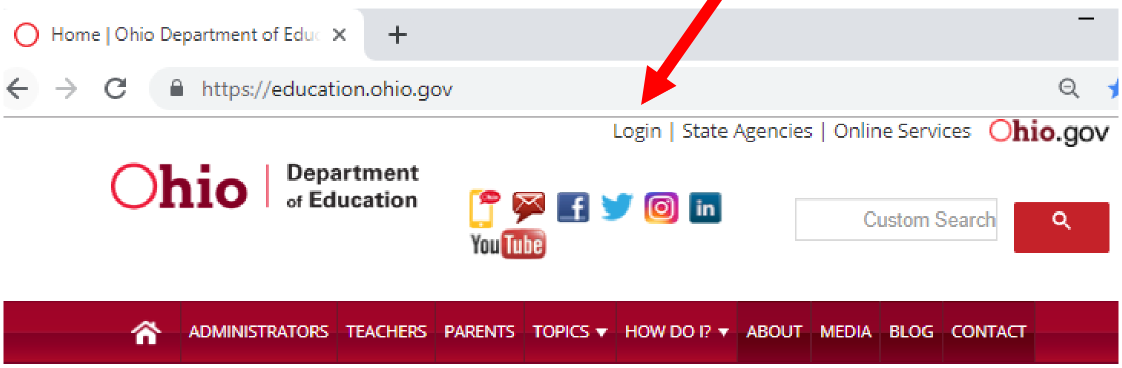
Question 1
For the students with disabilities in the sample check the validity of the data for funding purposes.
A student is eligible for special education funding if:

1. The ETR lists the disability of the student and current.
2. The IEP is in effect for the current school year.
3. The disability designation (In EMIS) matches the disability on the ETR.
4. The initial IEP is signed.

SSID	ETR is Current	IEP is Current	Student Disability is Properly Reported in EMIS	Initial IEP has parent signature or equivalent	Initial IEP start date is properly reported in EMIS	Action
	--	--	--	--	--	

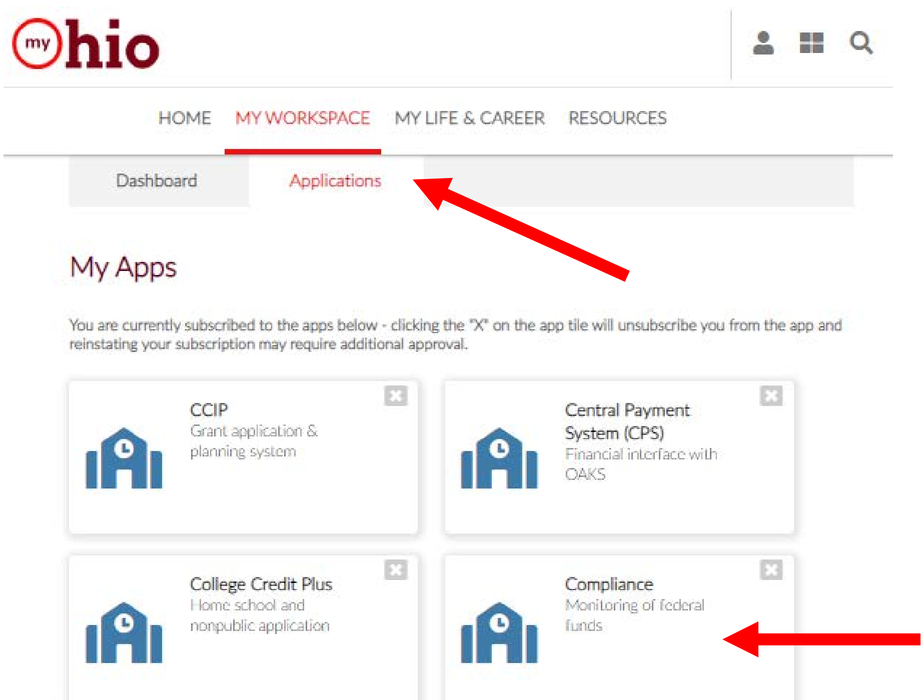
ODE Compliance System Navigation Directions

Accessing the Compliance Survey

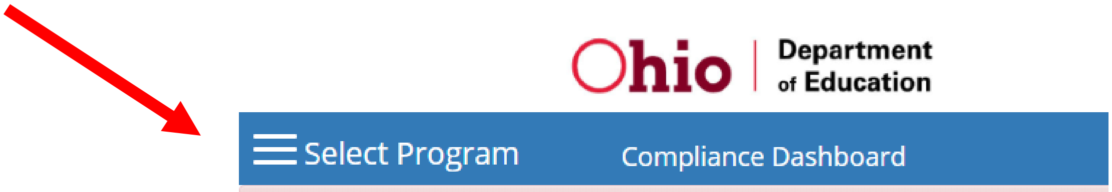


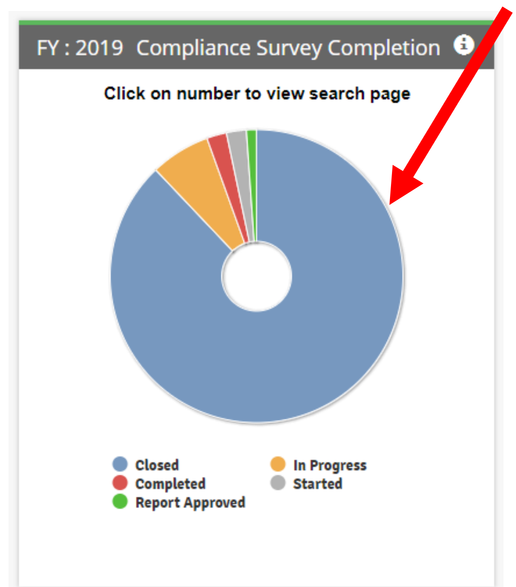
Users can access the online Compliance Community School FTE Review Survey through the Department of Education OH|ID secure web portal. Click on the Login link located at the top of the Department's home page. [Note: You must have an OHID account to sign in.]

1. After clicking the Login sign-in link, you should be on a page with the box in the image below.
2. Follow the prompts to login into your OHID account.
3. Go to MY WORKSPACE Applications and select Compliance.



4. You will now see your Dashboard. You can navigate to CS FTE Review Survey either through the Select Program option or by selecting a certain status of the survey in the Compliance Survey Completion widget. In order to access the CS FTE Review Survey, you must have one the roles assigned to you in the Ohio Educational Directory System (OEDS).





District Roles:

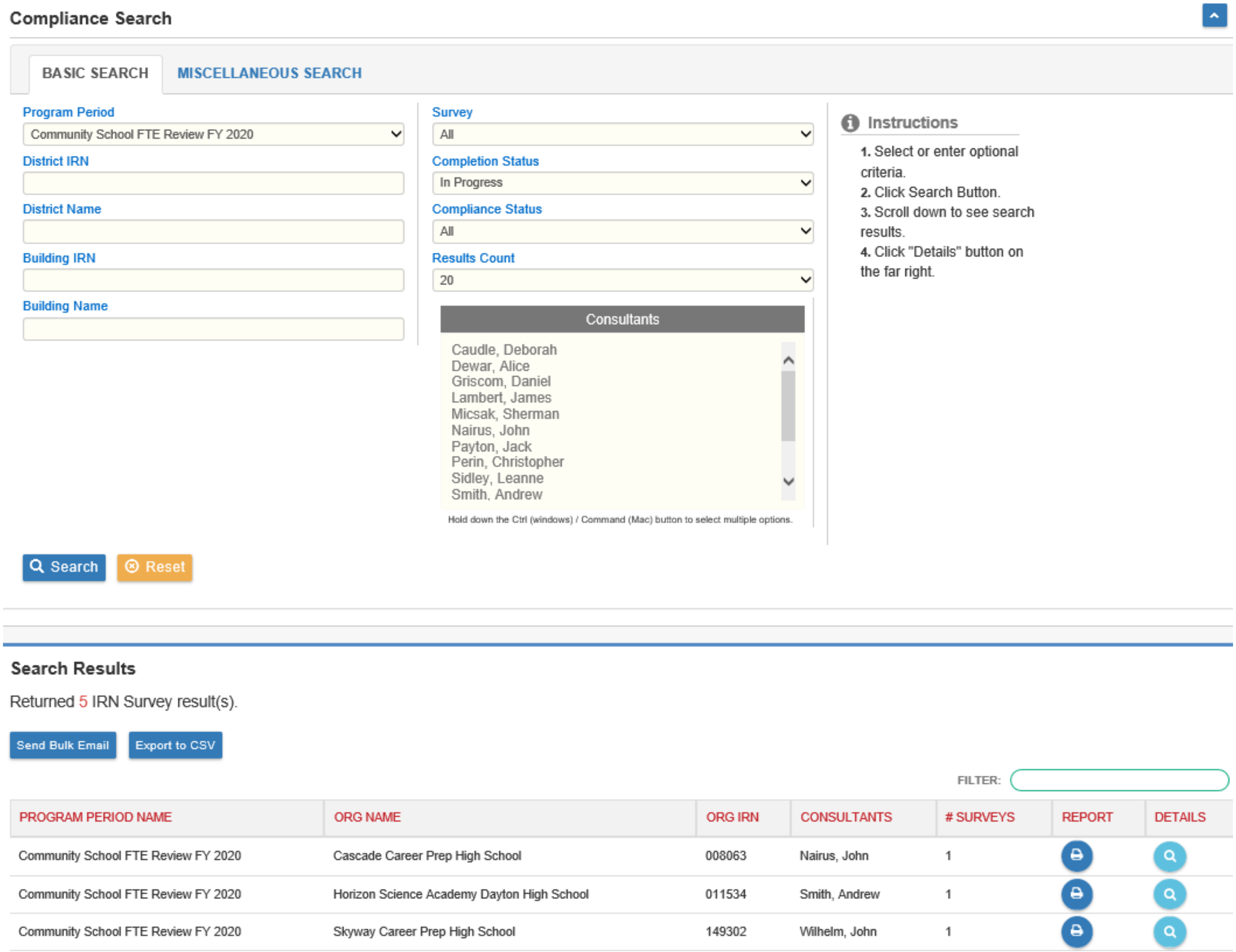
CCIP Authorized Representative
CCIP Fiscal Representative
Superintendent
Treasurer
Data Entry – Compliance

ODE Roles:

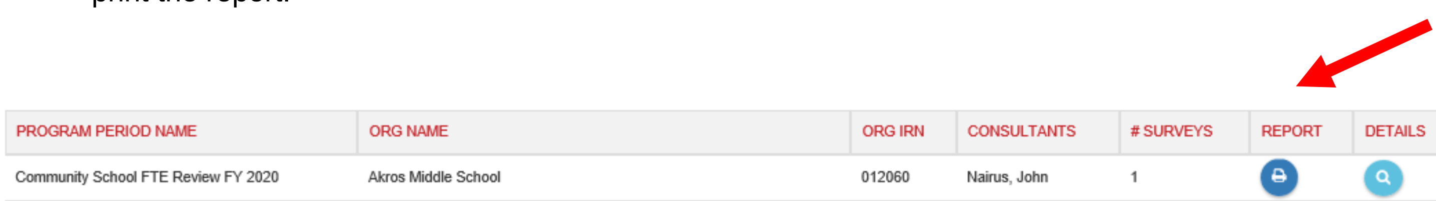
Compliance CS FTE Review Program Monitor
Compliance CS FTE Review Program View

Accessing the Compliance Survey for Community School FTE Review

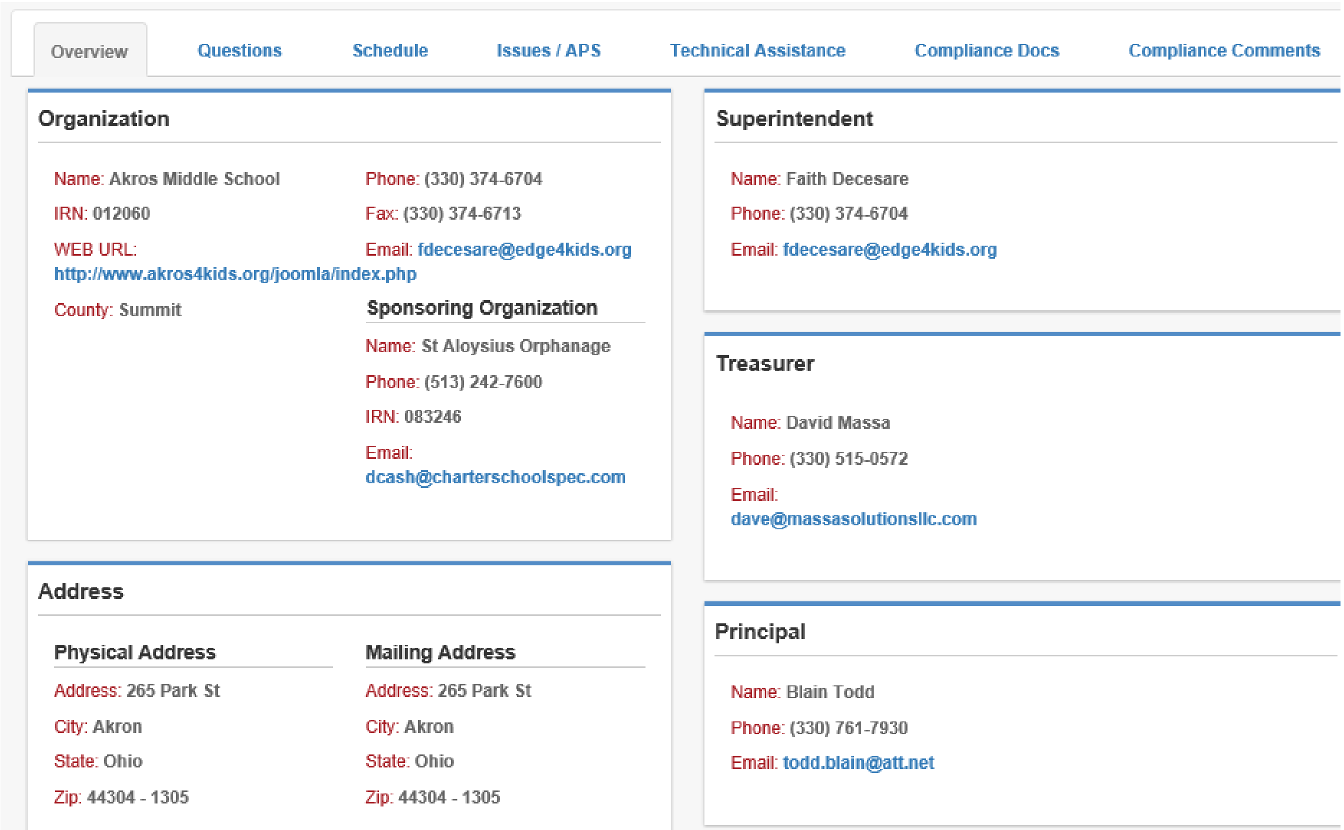
1. Once you have selected Community School FTE Review, the system will show the surveys available.



2. Click on the magnifying glass icon under Details to access the surveys. Click on the to print the report.



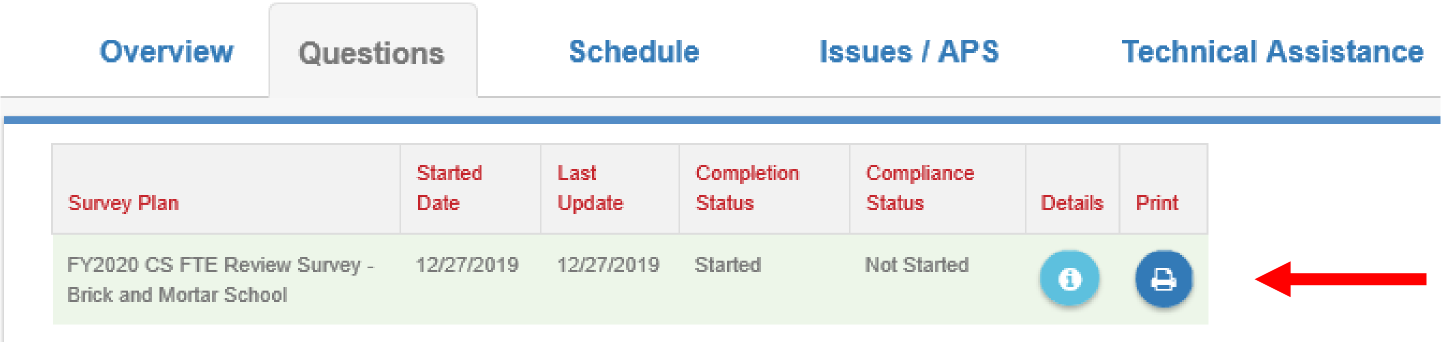
3. When the page loads, it will look like the image below. The Overview tab is populated with information from the Ohio Educational Directory System (OEDS). If the data is inaccurate, ask the OEDS organizational administrator for your community school to correct it in OEDS. To access the monitoring survey, click on the Questions tab.



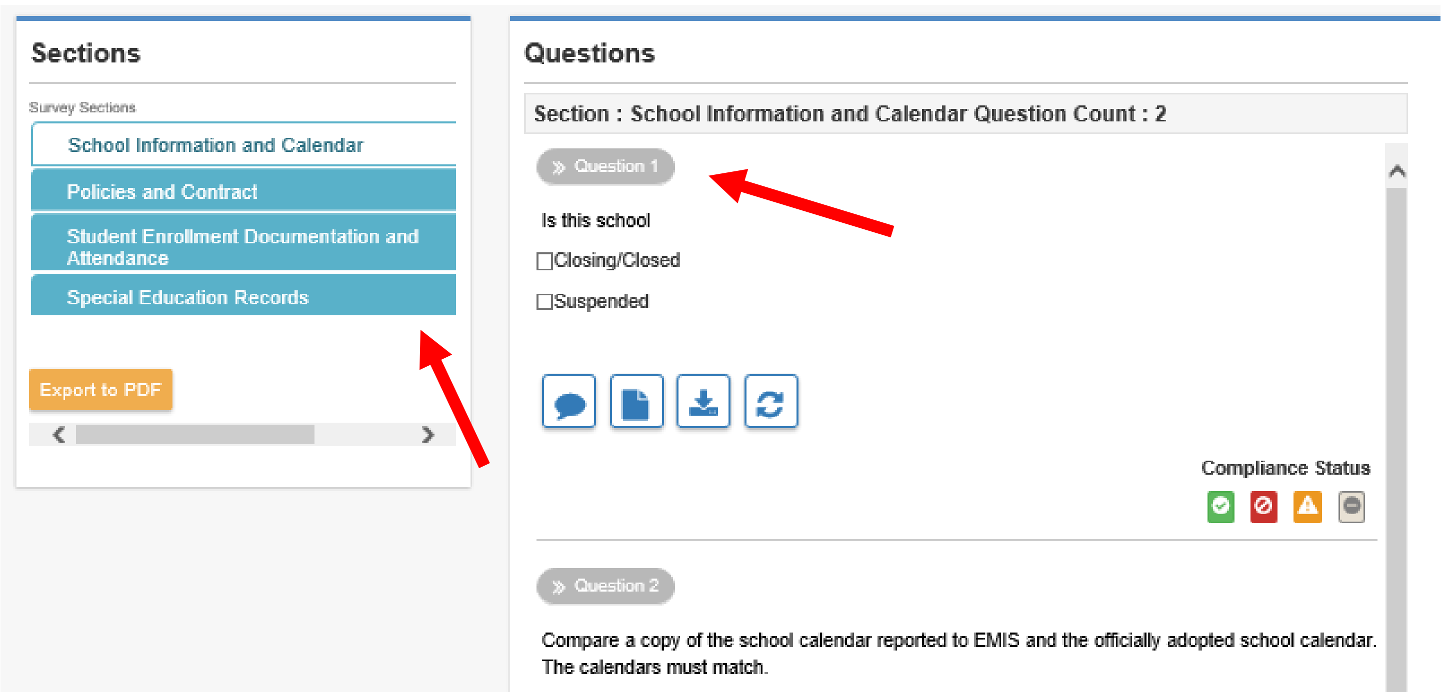
4. You will see the survey in the Questions tab. If Start is showing – ask your area coordinator to click the "Start" button.

Completing the Compliance CS FTE Review Survey

1. You may print the questions by clicking on the printer icon .



2. The survey has sections and questions. All questions must be answered by the area coordinator.



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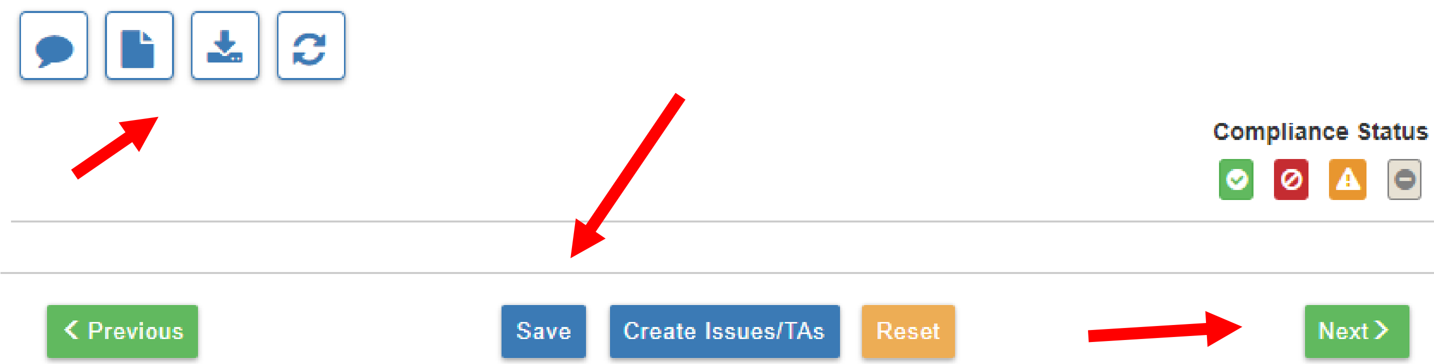
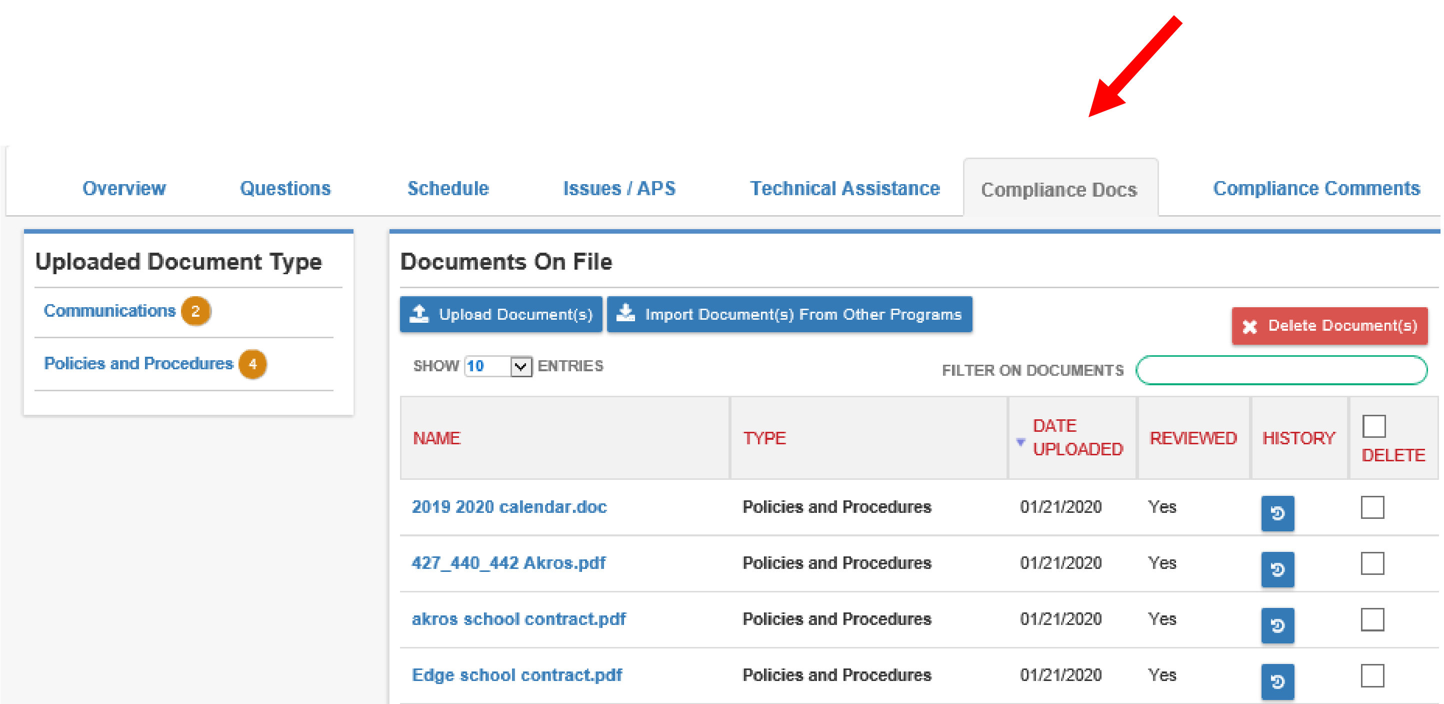
3. Community schools must upload these documents in the appropriate questions or Compliance Docs tab:
    - Copy of the contract with the school's sponsor (or a link to the contract on the Department's website);
    - The community school's written enrollment and attendance policies/procedures;
    - Board-approved kindergarten early entrance policy and/or acceleration policy, if applicable;
    - Credit flexibility policy, if applicable;
    - Board-approved school "operating" calendar; and
    - E-school and blended school: description of how the time is claimed for funding.

    You may upload from this screen or import from another compliance survey. If the question requires an explanation, use the Comment icon to describe how your community school is compliant. Once completed, click Save. To move to the next section, click Next.



4. The documentation that has been uploaded throughout the survey also will be displayed in the Compliance Docs.



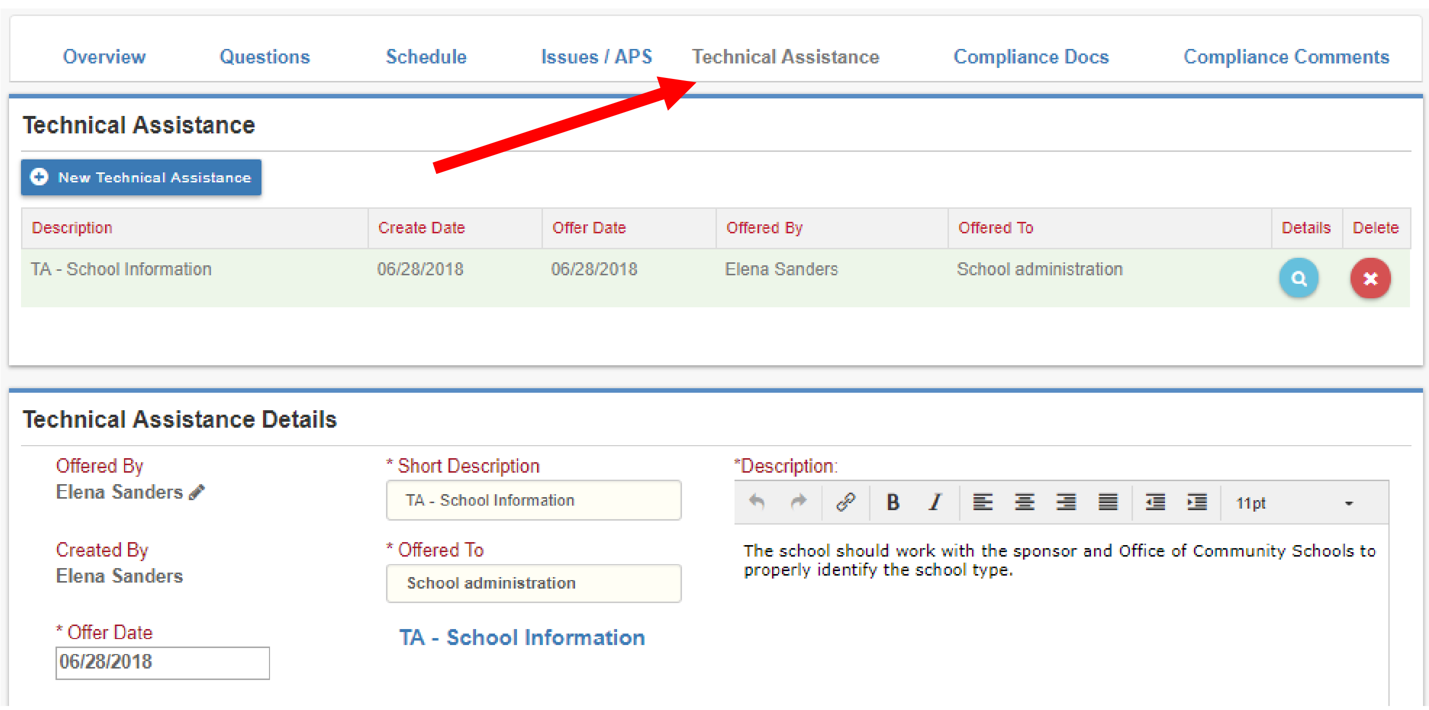
5. As the area coordinator works through the review, the system will indicate if there are unanswered questions in the section with the blinking icon. A green square with the checkmark indicates a completed section . A section that has not been started will display a gray square with circle inside . To view all sections and questions on the page, use the scroll bars.

6. The area coordinator will indicate compliance with the requirement by clicking on one of these buttons:

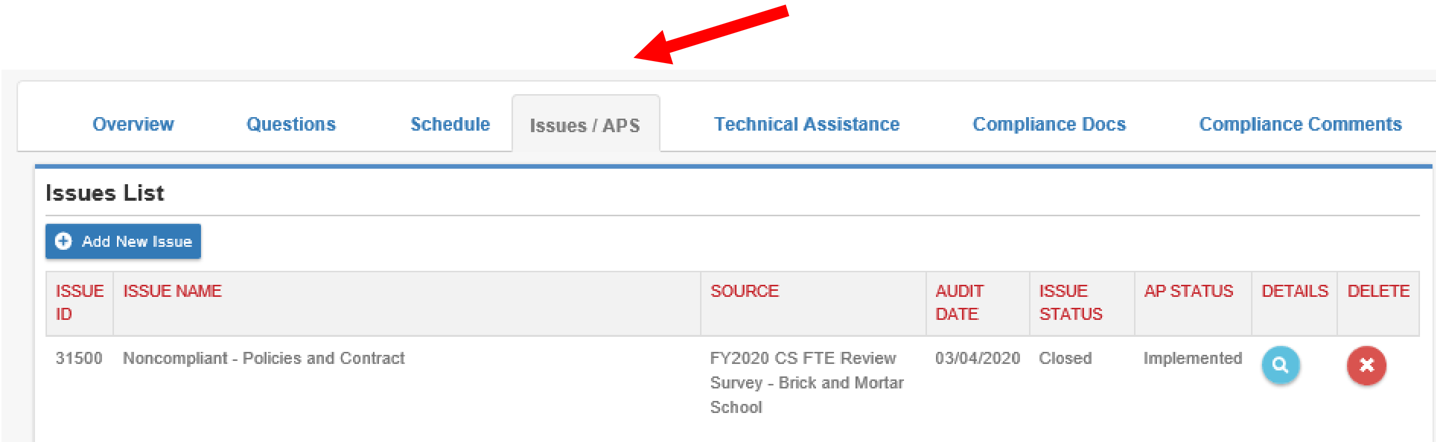
Compliance Status

	Compliant		**Technical Assistance**
	Noncompliant		**Not Applicable**

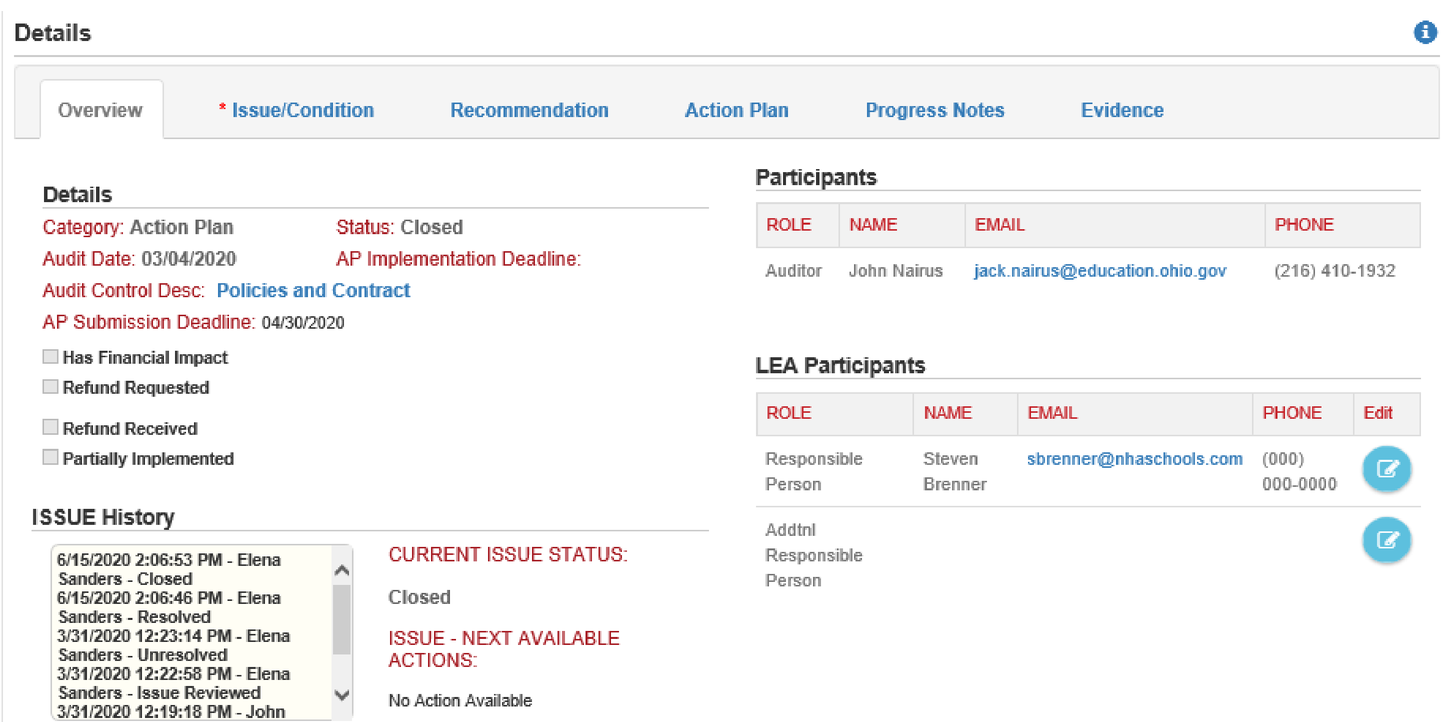
7. If technical assistance is provided for a specific area, the Technical Assistance tab will display the question. The area coordinator will enter the technical assistance provided in the Description box.



8. Noncompliance for any item in the Monitoring Survey will create an issue in the ISSUES/APS tab.



9. Each issue has a workflow. The area coordinator will identify the issue in the Issue/Condition tab and provide information on how this issue must be resolved in the Recommendation tab. The area coordinator will submit issue to the Ohio Department of Education representative for review. If the issue was resolved on-site, the area coordinator will state that in Recommendation tab, and no further action on the part of the community school will be necessary. The issue will be closed. If the issue was not resolved, the community school will be required to follow up by resolving the issues and showing the supporting documentation to the area coordinator. The area coordinator will indicate that the issues were resolved once everything has been properly resolved. Be advised that community schools may not upload any student identifiable information into the Compliance system.



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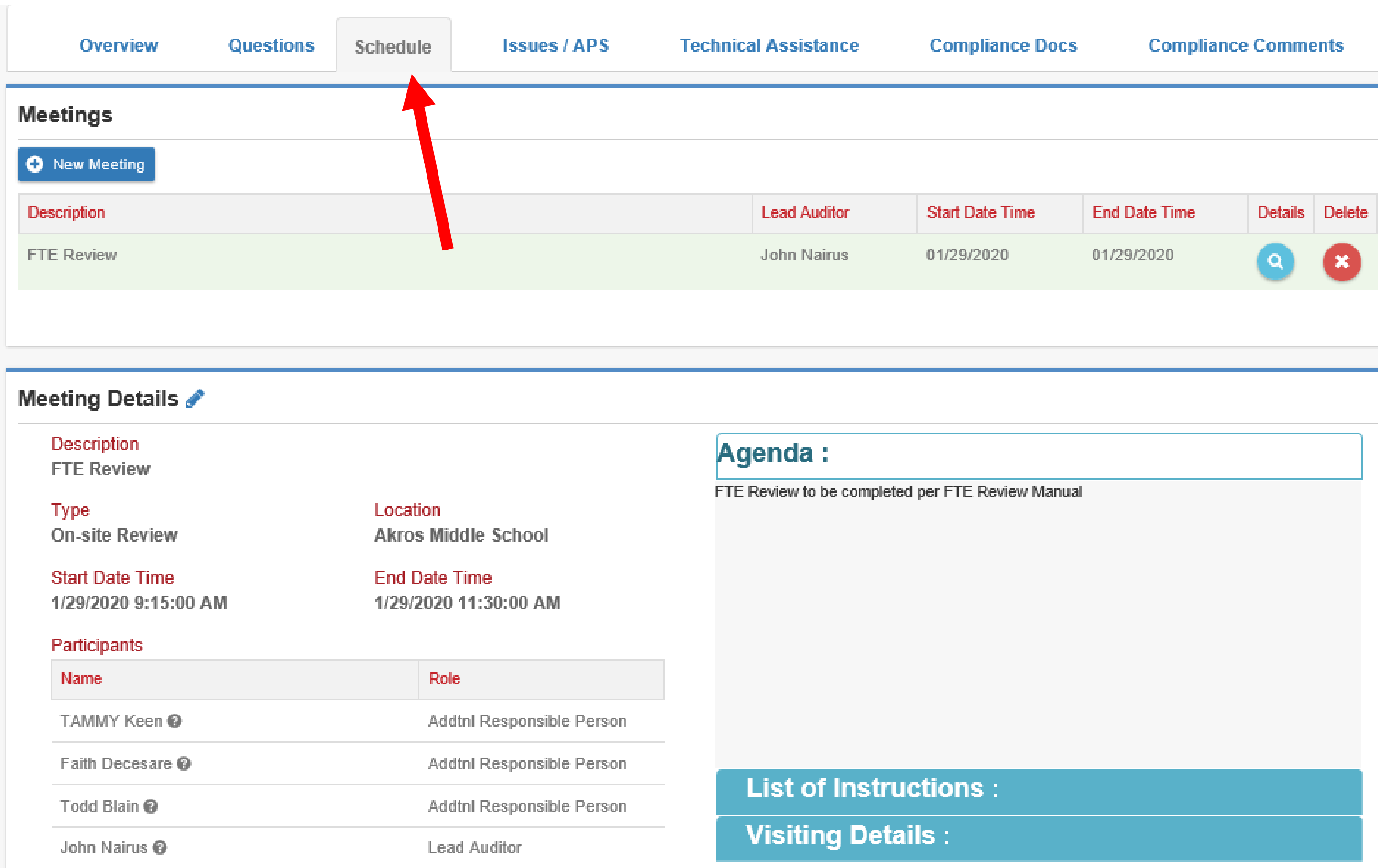
10. The area coordinator will enter the review date in the Schedule tab by creating a new Meeting.



11. When all questions are answered, documentation is uploaded, technical assistance is offered, and any noncompliance is identified, the area coordinator will mark the survey Complete.

Workflow of the FTE review through Compliance system

Who	What	When	Where in Complaince
AC	Once the review is scheduled create a **Meeting**	ASA Known	Schedule
AC	Click **Start** for the **Survey**	ASAP	Questions
AC	Let CS know that they can upload documents in the Compliance system		
CS	Upload the documents	2 weeks prior	Compliance Docs
ODE	Prepare the Sample and send to an Area Coordinator	1 week prior	
AC	Provide Sample to CS	2 or 1 day prior	
AC	Complete an onsite visit		
AC	Fill out the **Survey** in Compliance	5 days	Questions
AC	Prepare and enter **Report Introduction and Closing**		Overview
AC	If there are Issues, for each issue		
AC	Fill out **Details, Responsible Person, Issue/Condition** and **Recommendation**		Issues/APS
AC	Change status to **Submit Issue**		Issues/APS
AC	If there is Technical Assistance, for each TA		
AC	Fill out **Technical Assistance**		Technical Assistance
AC	Click **Complete**		Questions
ODE	Review **Survey, Report Introduction and Closing, TAs** and **Issues**	3 days	
ODE	If no follow up action is needed for Issue		
ODE	Change status to **Review Issue**, then to **Need No Action** and then to **Close**		Issues/APS
ODE	If Issue needs follow up		
ODE	Change status to **Review Issue**, then to **Mark Unresolved** (system adds **Action Plan**)		Issues/APS
System	E-mail is sent to the identified responsible person in CS		
ODE	Click **Approve Report**		Questions
AC	Create PDF of the community school report	1 day	Search Page, Printer Icon
AC	Send the PDF report to CS by e-mail		
AC	Click **Send Report**		Questions
ODE	Click **Close**	1 day	Questions
CS	For each issue that needs follow up	30 days	
CS	Resolve the issue		Issues/APS
CS	Document this in the system (description, upload supporting documentation)		Issues/APS
CS	Click **Submit AP**		Issues/APS
System	E-mail is sent to AC		
AC	For each issue that needs follow up	1 day	
AC	Review the documentation		Issues/APS
AC	Click **Approve AP**		Issues/APS
AC	Click **Completed Implementation**		Issues/APS
ODE	For each issue that needs follow up and has an implemented AP	1 day	
ODE	Change status to **Mark Resolved**, then to **Close**		Issues/APS
System	E-mail is sent to the identified responsible person in CS		