



Ohio

FY17 FTE REVIEW MANUAL

Office of School Finance

August 31, 2016

Table of Contents

Introduction.....2

Timeline3

Selection of Community Schools for FTE Reviews.....4

Orientation Visit.....5

Communication to School Prior to Orientation Visit.....6

Contacting School for that have a FTE Review7

Communication to Community School prior to FTE Review Meeting8

FTE Review Visit 9-11

Closing/Suspended School FTE Review Guidelines 12-14

Eschool FTE Review Guidelines..... 15-18

Non-Computer, Non-Classroom Documentation Guidelines 19-20

Calculation of FTEs based on Documented Learning Opportunities.....21

Learning Opportunity Documentation Requirements for eSchools 22-23

Learning Opportunity Documentation Requirements for Blended Learning Schools 24-25

Teacher Certification Example.....26

Obtaining the FTE Detail Report.....27

FTE Review Topics 28-46

Appendices..... 47-49

Q&A50

Additional Checklist Guidance..... 51-54

See End of FTE Review Manual for the following documents:

- FTE Review Checklist
- FTE Review Report Form
- Example of FTE Review Letter

Introduction

Community schools enter data concerning the enrollment and attendance of their students into EMIS and the EMIS data populates the School Options Enrollment System (SOES) which is used by the Ohio Department of Education (ODE) 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 into EMIS.

An ODE FTE review team examines enrollment and attendance policies, student enrollment data and the school's procedure for maintaining enrollment and attendance documentation that substantiates whether the data reported to ODE for funding is accurate and policies are compliant with governing law and rules. The review team compares the source enrollment and attendance data with the EMIS data submitted by the community school for funding and checks the validity of the IEP's being implemented in the school.

This handbook delineates and describes the procedures and forms that are generally used to conduct FTE reviews. It indicates what documentation must be collected and maintained by community schools and addresses issues involved in conducting FTE reviews. **The FTE reviewer or team may exercise discretion in implementing the various aspects of the review, provided the reviewer is consistent with governing laws, rules and this manual, to assure that the review is conducted 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. In addition, all parts of the checklist are mandatory. If an area coordinator has questions, he/she should consult with the Office of Budget and School Funding and/or Legal before proceeding.**

The area coordinator has the authority, in consultation with relevant ODE offices, to request such documents as necessary to complete the review from any necessary personnel of a community school or of a traditional public 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 [ORC 3314.08\(K\)\(1\)](#).

Words and paragraphs in this FTE Review Handbook which are in italics such as this sentence are the legal citations from the Ohio Revised Code.

Disclaimer: Any references to log-in only relate to enrollment and attendance. For eSchools, log-in and log-outs are required to document the student's participation in learning opportunities provided by eSchools. Any references to blended learning should not apply to eSchools due to the prohibition outlined in Ohio Revised Code Section 3302.41.

Timeline for Area Coordinator

- By September 1: The FY17 FTE Review Manual will be posted to ODE's website and community schools/sponsors will be notified by ODE via email.
- By September 15: Office of Budget and School Funding notifies community schools up for regularly scheduled FTE Reviews (normally every 5 years). A list of community schools up for FTE Reviews will also be posted to the ODE website and area coordinators will be notified of schools due for FTE Review.
- By September 15: Office of Budget and School funding will notify additional community schools added to current FY FTE Review list based on ODE office recommendations and criteria listed on page 5 of this manual.
- By September 30: Office of Budget and School Funding, in consultation with other ODE offices, will identify new community schools for that school year and will add them to the FTE Review list. Those community schools and impacted area coordinators will be notified.
- By October 31: Area coordinators will conduct orientation visits to new community schools per this manual.
- By January 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 30th.

Note: FTE reviews should be completed within seven business days of being notified by the Office of Quality School Choice of a 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....

By the end of August, the Office of Budget and School Funding will identify community schools due for regularly scheduled FTE Reviews (at minimum once every five years).

Additional community schools may be added to the FTE Review list for the current fiscal year for reasons including, but not limited to reasons listed below.

- New community schools (New IRN);
- Community schools that moved to a new location;
- Schools that have not been reviewed for the previous five years;
- Community schools overpaid by 10% 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;
- Community schools referred by the Auditor of State;
- Area coordinator recommendations;
- Office of Quality School Choice recommendations; and
- Community schools with a significant number of reporting errors, as identified in the Education Management Information System (EMIS), at the end of the previous school year. This would typically involve reporting errors that impact funding.
- Random selection of community schools

These schools will be notified by September 15th (new community schools will be identified and notified by September 30th).

Area coordinator recommendations may include community schools that have changed location or added additional 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. Such recommendations should be sent to the CS payment administrator by September 1st.

Orientation Visit

Area coordinators must visit newly chartered schools before October 31st of their first year of operation. To complete this effort, the CS payment administrator will provide a list of new schools to each area office by September 30th of each year. The list should include accurate school addresses, phone numbers, school administrators and a calendar for the current school year.

Orientation visits for schools that open after October 31st should be scheduled within 30 days of the school's opening.

The area coordinator will contact the new schools and schedule visits at a mutually convenient time and date. (See sample letter on the next page)

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

1. The school's annual calendar as reported in EMIS against the schools actual operating calendar (please note schools may have more than one calendar depending upon their operation);
2. The school's reporting in hours and the effect on the calculation of the FTE;
3. The role of error lists and how the school can use them;
4. Flagging and modification procedures;
5. The role of the area coordinator;
6. The area coordinator's role in the resolution of flags;
7. Funding timeline and payment reporting;
8. ETRs and IEPs, IEP reporting procedures and disability categories;
9. The FTE Review process (the FTE Review manual and checklist are posted on ODE's website);
10. Original source documents for documenting attendance;
11. Calamity days and make-up days;
12. Written enrollment and attendance policies;
13. Existence of the EMIS Manual, as necessary;
14. (If a high school), College Credit Plus and CTE funding; and
15. Anything else which the area coordinator feels should be discussed.

Communication to a Community School Before an Orientation Visit

The following message should be scanned or emailed to the 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 error lists and how the school can use them;
4. Flagging and modification procedures;
5. The role of the area coordinator;
6. The area coordinator's role in the resolution of flags;
7. Funding timeline and payment reporting;
8. ETR's and IEP's, IEP reporting procedures and disability categories;
9. The FTE Review process;
10. Original source documents for documenting attendance;
11. Calamity days and make-up days;
12. Written enrollment and attendance policies;
13. Use of the EMIS Manual, as necessary
14. If a high school, College Credit Plus and CTE funding;
- 15 Any questions that you may have.

You are invited to have any staff members who are involved in these procedures available for the visit.

Contacting Schools that will receive a FTE Review

Between September 30th and January 31st, Area Coordinators should contact all community schools that will receive a FTE Review to do the following:

- If requested by the school, schedule in-person meetings to answer questions regarding the FTE Review process and manual (this is recommended but not required). As a best practice, it is advisable to select a few student records and use the manual/checklist to walk the schools through what will take place during the review. Area coordinators may use their discretion and require this step.
- Answer questions in-person, by phone, or via email regarding the FTE Review process, including discussing the procedures, learning opportunity documentation requirements, timelines, etc.
- If requested by the school, schedule in-person meetings to review the school's learning opportunity documentation system/methods, records, computer/online system (if applicable), procedures, etc. Area coordinators may use their discretion and require this step.

New community schools will receive Orientation Visits per pages 4-5 of this manual. In all aspects, Area Coordinators should use their discretion to determine what level of information, assistance, and explanation is needed to ensure the community school fully understands the FTE Review process. Area coordinators and community schools should work together to determine if a more in-depth meeting is needed 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 they are not a new school. Finally, Area Coordinators do not need to report anything from these visits to ODE. For example, no letter or checklist is required. This is purely for informational purposes only.

Requirements for eSchools and Schools with Authorized Blended Learning Models

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

Information to be provided to a Community School Before an FTE Review Visit

The following information should be emailed to the community school prior to an FTE Review visit. If it is an eSchool or school authorized to use a blended learning model, the area coordinator should update the list of items to include all documentation of student participation in learning opportunities as required by the checklist (See Item 8 of the checklist).

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 2016-17 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 10:00 a.m. on Friday, June 10, 2016. As part of the review, I will be comparing the school's enrollment and attendance data with the school's EMIS data and will try to resolve challenges identified by any error flags.

Please prepare the following items in advance and have them available for the reviewer's use during the visit:

1. The most recent FTE Detail Report containing only the columns indicated on the "Obtaining a List of Students from the FTE Detail Report".
2. Copy of the contract with the sponsor
3. The community school's written enrollment and attendance procedures.
4. For each child:
 - a) Birth certificate;
 - b) Proof of residency;
 - c) Enrollment form;
 - d) Withdrawal form, if applicable;
 - e) Proof of attendance by way of an original source document;
 - f) For any special education child, the ETR and the current IEP.
 - g) Documentation of participation in learning opportunities per the FTE Review manual.
5. The reviewer or the area coordinator has the authority, in consultation with the relevant ODE 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 3313.08](#).

An initial letter will be sent to the school, with a copy to the Sponsor, that outlines the results of the FTE Review. Any determination that results in a reduction of funding will be sent by the Office of Budget and School Funding, with a copy to the Sponsor. This is the letter that triggers the right to appeal the determination.

FTE Review Visit

The area coordinator will contact each school by January 31 to discuss the FTE Review process and to answer questions.

Area coordinators will complete FTE Reviews for all schools by June 30th (may go past June 30th deadline with approval from the Office of Budget and School Funding). Area coordinators should wait to conduct eSchool and blended learning school reviews until after the end of the school calendar year. Before the visit, the area coordinator should obtain a copy of the most recent FTE Detail report (see “Obtaining a List of Students from the FTE Detail report on p. 27).

During the FTE review visit, the coordinator shall follow the procedures listed in the FTE Review Checklist located at the end of this manual and will:

1. Ask the community school to provide the most recent FTE Detail Report from the Data Collector which shows the total enrollment for the school year. In this regard the coordinator will request the community school to generate the specific FTE Detail Report and FTE Adjustments Report that contains the available data needed to conduct the FTE review. (see Instructions on p.27).
2. Work with the Community School Payment Administrator to generate the needed random sample of students that include students who receive special education services (at least 25% should have a disability status on the FTE Detail Report). A specific FTE Detail Report will be generated for the FTE Review. The sample size may vary based on the size of the school (total FTEs) and on other risk factors.
3. Review the records of all the randomly selected students for accuracy to ensure that each record contains a birth certificate, proof of residency, and other relevant documentation.
4. 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.
5. Review the school’s contract to see if the school is authorized to use a Blended Learning Model. eSchools are not permitted to use blended learning models under Ohio Revised Code Section 3302.41.
6. The coordinator also should review the special education folder for each sampled student to confirm that the student’s disability is substantiated on page 4 of the ETR and agreed to on page 5, that the effective date of the IEP is correct, and that the signature pages of the IEP have been completed properly.

At the completion of the review of student records, the coordinator shall inform the school of any errors that were discovered. These may include, but not be 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 (birth certificates, proof of residency, etc.), lack of learning opportunity documentation, or other issues that may arise.

If errors are found during the review, the area coordinator has the discretion to pick a second sample of students for FTE review. If a second sample is not selected, this does not mean that there are no errors or issues that will be reported to ODE for potential follow up action.

Timeline

Area coordinators will complete FTE Reviews for all schools by June 30th (may go past June 30th deadline with approval from the Office of Budget and School Funding).

This timeline does not apply when a community school is closing at the end of the school year. Additional guidelines for use when a school is closing or has closed are described in the next section.

Section 3314.08(K)(1) of Ohio Revised Code outlines the full FTE Review process timeline.

3314.08(K)(1) 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.

FTE Review Letter or E-mail Reporting Results

Preliminary results of the FTE review may be discussed with the community school before leaving the review site, but this will not be considered the final results since ODE needs to review and evaluate the information.

The reviewer should email the FTE Review letter and FTE Review Report Form to the community school, sponsor and the CS payment administrator within one month of the full completion of the review, if possible.

A copy of the review letter with the FTE Review Report Form attached must be sent to the designated representative for the Auditor of State's Office (_____@ohioauditor.gov) for the FTE Review.

Closing/ Closed School/ Suspended School FTE Review Visit

Coordinators should use these guidelines when completing a FTE Review in a community school when it is closing, or after it has closed during the course of the current school year or after a school year, or has been suspended.

The Office of Quality School Choice has established procedures concerning where originals of records are to be sent and where copies are to be sent after a community school closes. See the Office of Quality School Choice' Guidance Document entitled "Community School Closing Procedures."

Timeline

The FTE review shall be conducted **within seven business** days of the closing, if possible or within seven business days after notification by the Office of Quality School Choice 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 FTE Review Checklist, preferably before the last day of instruction or immediately after the school year closes.

In the case of an emergency closing, the availability of records, files and original source documentation can often be lost, misplaced or stolen, and be inaccurate. If all records are not at the site and available immediately, 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 if possible. A **certification form** (see page 14) certifying that all attendance and enrollment documentation was provided and examined will be signed by both the area coordinator conducting the review and by the sponsor/administrator of the school. This form will remain part of ODE's official file.

The area coordinator shall notify the school administration and the school sponsor of the time and date of the review by telephone (for speed) **and** e-mail (for written documentation). The notification should include information about what documentation is needed for the review (student files, attendance records, IEP records, original source data, etc.); and the notification should indicate the necessity of the sponsor or the administrator to be in attendance at the exit conference following completion of the review.

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

A letter to communicate the results of the FTE review should be sent to the community school administrator with copies to the sponsor, the ODE CS payment administrator, and the designated representative for the Auditor of State. Records of the FTE review shall be filed in a regional office.

Onsite Guidelines for Completing the Closing School/Suspended School FTE Review

The reviewer will follow the procedures in the FTE Review Checklist, beginning with item #4.

If original source documentation of attendance is not provided, students shall be considered present only on days where attendance is documented. The 105-hour rule does not apply after the last day that a school was in session for the school year and students are to be withdrawn on the last day after the last documented date of attendance.

An exit visit (with whomever, either sponsor or administrator or EMIS coordinator) will be conducted before reviewers leave the site. All notes from the exit review will remain as part of ODE's file. The **certification form** certifying that all available attendance and enrollment documentation was available and utilized for the review will be signed at the exit conference by both the ODE area coordinator and the sponsor/school administrator and will also remain as part of the file.

When finished, the lead reviewer will write a letter/report that may include a narrative of the procedures followed, the FTE findings of the reviewers and a listing of all remaining errors. This letter/report with a copy of the FTE Review Report Form attached will be sent to the community school, sponsor, to the Office of Quality School Choice, to the CS payment administrator, and to the designated representative for the Auditor of State's Office (_____@ohioauditor.gov). All issues will be reported to the CS payment administrator for potential follow up action.

Closing/Closed/Suspended School FTE Review Certification Form

I, _____, certify that all available and appropriate ETR's and IEP's, and enrollment and attendance records were made available for this final FTE review.

I, _____, Area Coordinator, certify that all available on site ETR's and IEP's, and all enrollment and attendance records were utilized in the completion of this final review.

1st blank: signature and position of individual representing sponsor/school administrator

2nd blank: name/signature of area coordinator

Forms to be completed at final exit conference and filed with the official file

(may be copied for sponsor or administrator if requested)

eSchool Review FTE Review Procedures Internet or Computer-Based Community School (eSchool)

[RC 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 eSchool

ORC 3314.08 (N)(1) – 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.

eSchool FTE Review Guidance

When reviewing an eSchool, coordinators must follow the review procedures listed in this manual and in the checklist for all community schools; however, some procedures will vary in level of detail and will be different because of the legal obligations and unique situations of the eSchool.

The reviewer should keep in mind that the funding for eSchools is different from the funding of other community schools in some aspects. The funding for eSchools consists only of the formula amount (based on an accurate FTE calculation), the special education amount calculation, and career-technical education funding. There are no funds for economic disadvantaged funding, targeted assistance, limited English proficiency, K-3 literacy, or transportation funding. This situation warrants eSchools to have an accurate FTE calculation; therefore, the reviewer of eSchools must pay careful attention to the relationship between the hours/days of instruction and the daily/hourly attendance documentation used in calculating the final FTE for each student.

When reviewing an eSchool, the reviewer must follow all the review procedures in the FTE Review Checklist, incorporating these required procedures for eSchool FTE Reviews:

1. The reviewer will check original source documentation that shows a computer was delivered to each student (see eSchool: Commencing of Instruction in an eSchool, under Topics/Issues). This documentation should be signed by the parent to verify delivery and setup dates. But it could be any reasonable documentation of the delivery and setup (packing notice, delivery schedule notice, etc.). 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. This date determines the original entry date for the student. Additional yearly entry dates will be established as the first date logged on to access a learning opportunity in the next year. A student who doesn't log on at all in the new year is considered a "no show" and will not be funded.

2. An eSchool is also required to maintain student attendance records, as specified in the eSchool's written attendance policy. The reviewer will verify and check that the school has a written attendance policy and that it is being followed.

The reviewer will check the attendance record procedure maintained by the eSchool.

3. The reviewer will request that the **Total Learning Opportunity Records** for all eSchool students be emailed to the reviewer within 5 business days after the completion of the in-school portion of the review (in Excel format) that include the following elements:
 - Student SSID numbers (This document cannot contain student names)
 - Total amount of documented time a student participated in online learning opportunities that occurred within and were tracked by the schools online learning system. This should match the amount of time that may be tracked by the eSchool's online system (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" listed on page 19. It is recognized that schools may track online learning opportunities in different ways due to different system capabilities.
 - Total amount of documented time a student participated in "Other Learning Opportunities" or non-computer, non-classroom based learning opportunities. See "Guidance on Conducting FTE Reviews for Schools Using Non-classroom, Non-computer based learning opportunities" on page 19 for additional information on required documentation and review.

Example of Total Learning Opportunity Records (Excel Format)

SSID #	Computer Based Learning Opportunities (Documented by the school's system) Total Hours	Other Learning Opportunities Total Hours
SDFS87897	120	80
WED897897	80	150
HJY77865	50	228

The reviewer, with assistance from the Office of Budget and School Funding, will compare the total amount of verified time a student participated in documented learning opportunities against the FTE being reported for each student to ensure that students are only being funded for documented time spent on learning opportunities. This review will take place AFTER the FTE Review, and nothing is required during the FTE Review.

Reviewing Total Learning Opportunity Records Example

- If student A was enrolled at the eSchool for the entire calendar year and has 780 hours of verified learning opportunities, then the FTE should be 0.85 FTE (780 hours divided by 920 hours of possible learning opportunities = 0.85)
 - Then, the reviewer will compare the calculated FTE based on documented learning opportunities against the FTE being reported to ODE to ensure the proper adjustments are being made. If the reported FTE does not match the calculated FTE, these findings should be reported to ODE for possible follow-up actions.
4. The reviewer will check the individual attendance record(s) for at least 50 students in the random sample per the FTE Review checklist (Items 8a for eSchools and Item 8j for blended learning schools). If the review sample has less than 50 students, then this should be done for each student. These attendance records should show both when a student accessed learning opportunities and how long he/she participated in these learning opportunities, if the online system is able to document these learning opportunities. A learning opportunity for an eSchool student could be documented computer time for doing homework in any subject, reading resource documents, writing resource papers, taking tests at the school, doing research, conferencing with teachers, etc. If the school's online system is not able to document learning opportunities that take place within the system, the school then must document these learning opportunities per the requirements on pg. 22-23 (Learning Opportunity Documentation Requirements for eSchools).

All non-classroom activities must also be documented in a form consistent with this manual and approved in writing by a teacher, supervisor or school administrator and must include an hourly/daily/weekly accounting that the hours documented were hours in which the student accessed a learning opportunity. See "Guidance on Conducting FTE Reviews for Schools Using Non-classroom, Non-computer based learning opportunities" for additional information on required documentation on pg. 19-20.

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 per the checklist.

Regular and End-of Year FTE Adjustments for E-School and/or Non-Computer, Non-Classroom Based Students

For determination of the “percent of time” element reported in EMIS, used to determine a partial FTE for a student, the school should estimate the student’s percent of time upon enrollment, and document and follow a procedure to update the student’s percent of time element periodically based on documented hours in comparison with hours needed at that point of the year to be on track for full-time status. Area coordinators may advise schools to update the “percent of time” factor if adjustments may be necessary to avoid significant adjustments at the end of the year/during the FTE Review. At the end of the school year, the school will adjust the percent of time element to precisely reflect the student’s documented hours of participation in learning opportunities provided by the school. For more information about the percent of time factor, please consult the EMIS Manual.

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

Community schools with non-classroom-based, non-computer-based learning activities are subject to the same FTE reporting and documentation requirements as all other community schools. The following is to be used as guidance for area coordinators when conducting annual FTE Reviews for schools with these types of learning activities. **Schools utilizing blended learning models or eSchools must document learning opportunities 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, Non-computer Learning Activities

[RC 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.

1. **Minimum Documentation Requirements for Non-Classroom, Non-Computer Based Learning Opportunities¹** – Documentation must exist for all non-classroom, non-computer based learning opportunities and must be verified by the school/teacher. The following are minimum requirements for non-computer, non-classroom based learning opportunities.
 - a. Schools may use the “Alternative Learning Opportunity Documentation Log” to document learning activities. Any documentation must at least include the following elements:
 - i. Student SSID #
 - ii. Brief Description of learning opportunities (Ex. class or course information)
 - iii. Dates and times of actual learning opportunities
 - iv. Total of verified learning opportunities time
 - v. School certification of the reported learning opportunities (see Teacher Certification on p. 22)

Schools must be able to email ODE (in Excel format) both total computer based and non-computer, non-classroom based learning opportunities for each student by SSID number.

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 may also include computer/online learning opportunities that were not tracked by the school's computer/online system.

- b. Estimated or approximated times cannot be used for the purposes of calculating FTEs. For example, if an assignment was estimated to take fifteen hours to complete and it only took the student 10 hours to complete, the student would be given credit for ten hours towards the 920 total.
- c. All non-classroom based learning hours must be certified by an employee and documented. Schools may use different means to certify documented learning opportunities; however, that process must be applied consistently and adhere to the requirements of this manual. If the non-classroom activities are computer-based, this should match the amount of time that may be tracked by the eSchool's online system (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" list on page 19. 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 monthly basis by an employee of the school. It is recommended that this be a teacher who is licensed by the Ohio Department of Education and hence is subject to The Licensure Code of Professional Conduct for Ohio Educators.

Calculation of FTEs based on Documented Learning Opportunities

The actual number of hours the student participates in learning opportunities must be tracked and documented 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 be given credit for providing partial hours of learning opportunity for each partial hour of student work that is documented per this manual. Non-classroom learning opportunities are only credited for actual documented hours; **missed days (both excused and unexcused absences) or assignments do not count as hours.**

A student may combine hours from different learning modes. For example, a student with 460 hours of non-classroom documented hours, 460 hours of classroom-based instruction would have 920 total hours. Documentation, such as attendance logs, of classroom-based learning must be compiled and kept by the teacher of the classroom.

The school will report, for funding purposes, each student's FTE based upon hours of documented learning opportunities, as a percentage of 920 hours of learning opportunities. For example, if the school can document 920 hours of student participation in learning opportunities, the student will be reported as 1.00 FTE, but if it can only document 690 hours of student work in that way the student will be reported as .75 FTE. Any student with documented hours in excess of 920 hours will be reported as 1.00 FTE.

Area coordinators should ensure that the FTEs calculated match the documentation provided by the school for learning opportunities. A school with blended learning opportunities must be ready to display online, in-school, and at home learning opportunity attendance records for each student.

If significant discrepancies or issues are detected, it is recommended that area coordinators widen the sample of student records to review. Area coordinators should use their judgement and experience in making these determinations. The intent is to detect issues and resolve FTE calculation and documentation issues as early as possible.

Area coordinators are advised to check for student records with the same configuration of non-classroom learning activities. It is expected that non-classroom learning opportunities will vary among individual students. If a pattern is detected that a significant number of students all have the same or very similar combination of online, in-school, and at home learning opportunities, area coordinators are advised to further investigate and report these findings to ODE in the FTE Review letter.

Learning Opportunity Documentation Requirements for eSchools

eSchools are required to document student participation in learning opportunities. These records will be reviewed and checked during the FTE Review process and may be used to adjust FTEs and funding. eSchools will only receive credit for documented learning opportunities; **missed days (both excused and unexcused absences) or assignments do not count as hours**. No eSchool shall be credited for any time a student spends participating in learning opportunities beyond ten hours within any twenty-four consecutive hours per ORC Section 3314.08(H)(3). The following outlines the documentation requirements for eSchools.

Online Learning Opportunities – Tracked by the School’s System

eSchools may have systems that track learning opportunity participation that take place within the school’s online system. If an eSchool’s online system has this capability, then the school must produce Excel spreadsheets showing the daily/weekly/monthly accounting of learning opportunities AND the final total of all online learning opportunities that the student participated in and were tracked by the eSchool’s system.

The school must be able to email this documentation to ODE upon request and in Excel format by SSID (see the Total Learning Opportunity Record section below).

Other Learning Opportunities

eSchool’s may have learning opportunities that are not tracked by the school’s online system and/or that take place off-line or not on a computer. In addition, some eSchool’s online system may not be able to track and document the student’s participation in the online system learning opportunities. eSchool’s that have these situations must use the following minimum documentation requirements and must be able to provide to Area Coordinators and ODE officials the needed information upon request.

Documentation must exist for all learning opportunities and must be verified by the school. The following are minimum requirements for “Other Learning Opportunities”.

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

- a. Student SSID #
- b. Brief Description of learning opportunities (Ex. class or course information)
- c. Dates and times of actual learning opportunities
- d. Total of verified learning opportunities time
- e. School certification of the reported learning opportunities

eSchools may use the “Alternative Learning Opportunity Documentation Log” to document these learning opportunities, but they are not required to. This is an example of how these learning opportunities can be tracked. It is up to the school to decide on how best to meet these requirements.

Estimated or approximated times cannot be used for the purposes of calculating FTEs. For example, if an assignment was estimated to take fifteen hours to complete and it only took the student 10 hours to complete, the student would be given credit for ten hours towards the 920 total.

Certification of Non-Classroom Learning Opportunities

All non-classroom based learning hours must be certified by a school employee and documented. Schools may use different means to certify documented learning opportunities; however, that process must be applied consistently and adhere to the requirements of this manual. If the non-classroom activities are computer-based, this should match the amount of time that may be tracked by the eSchool’s online system (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” list on page 19. 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 monthly basis by an employee of the school. It is recommended that this be a teacher who is licensed by the Ohio Department of Education and hence is subject to The Licensure Code of Professional Conduct for Ohio Educators.

Total Learning Opportunity Records

Schools must be able to email ODE (in Excel format) both Online Learning Opportunities and Other Learning Opportunities for each student by SSID number.

Example of Total Learning Opportunity Records (Excel Format)

SSID #	Computer Based Learning Opportunities Total Hours	Other Learning Opportunities Total Hours	Total Documented Learning Opportunities
SDFS87897	120	80	200
WED897897	80	150	230
HJY77865	50	228	278

Learning Opportunity Documentation Requirements for Schools with Authorized Blended Learning Models

Schools with authorized blended learning models are required to document student participation in learning opportunities. These records will be reviewed and checked during the FTE Review process and may be used to adjust FTEs and funding.

Online Learning Opportunities – Tracked by the School’s System

Schools may have systems that track learning opportunity participation that take place within the school’s online system. If a school’s online system has this capability, then the school must be able to produce Excel spreadsheets showing both the daily/weekly/monthly accounting of learning opportunities AND the final total of all online learning opportunities that the student participated in and were tracked by the school’s system.

The school must be able to present this documentation to Area Coordinators and ODE officials upon request and in Excel format by SSID (see the Total Learning Opportunity Record section below).

Other Learning Opportunities

Schools may have learning opportunities that are not tracked by the school’s online system and that take place off-line or not on a computer. In addition, some school’s online system may not be able to track and document the student’s participation in the online system learning opportunities. Schools that have these situations must use the following minimum documentation requirements and must be able to provide Area Coordinators and ODE officials with the needed information upon request.

Documentation must exist for all learning opportunities and must be verified by the teacher/school. The following are minimum requirements for “Other Learning Opportunities”.

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

- a. Student SSID #
- b. Brief Description of learning opportunities (Ex. class or course information)
- c. Dates and times of actual learning opportunities
- d. Total of verified learning opportunities time
- e. School certification of the reported learning opportunities

Schools may use the “Alternative Learning Opportunity Documentation Log” to document these learning opportunities, but they are not required to. This is an example of how these learning opportunities can be tracked. It is up to the school to decide on how best to meet these requirements.

Certification of Non-Classroom Learning Opportunities

All non-classroom based learning hours must be certified by a school employee and documented. Schools may use different means to certify documented learning opportunities; however, that process must be applied consistently and adhere to the requirements of this manual. If the non-classroom activities are computer-based, this should match the amount of time that may be tracked by the eSchool's online system (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" list on page 19. 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 monthly basis by an employee of the school. It is recommended that this be a teacher who is licensed by the Ohio Department of Education and hence is subject to The Licensure Code of Professional Conduct for Ohio Educators.

Total Learning Opportunity Records

The reviewer will request that the **Total Learning Opportunity Records** for all blended learning students be emailed to the reviewer within 5 business days after the completion of the in-school portion of the review (in Excel format). Schools and area coordinators should follow the same procedures outlined in sections #3, #4 and the Regular and End-of Year FTE Adjustments for E-School and/or Non-Computer, Non-Classroom Based Students section on pp. 16-18.

Schools must be able to submit (in Excel format) both Online Learning Opportunities and Other Learning Opportunities for each student by SSID number. Please note that schools authorized to use blended learning models should include all classroom-based learning opportunities that were available to the student. The school will get credit for all those classroom-based learning opportunities even if the student was absent (either excused or unexcused). These days/hours are treated just like learning opportunities at a brick-and-mortar school.

Example of Total Learning Opportunity Records (Excel Format)

SSID #	Computer Based Learning Opportunities Total Hours	Other Learning Opportunities Total Hours	Classroom-based Learning Opportunities	Total Documented Learning Opportunities
SDFS87897	120	80	200	400
WED897897	80	150	300	530
HJY77865	50	228	500	778

Teacher Certification Example

I hereby certify, pursuant to my obligations under [O.R.C. 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, _____ spent _____
(name of student) (number)

hours during _____ towards the completion of the plan
(month/year)

agreed to on his/her behalf and _____ on
(school name)

(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)

Click on: Collection Request (FY17 – S – SOES Init)

Click on: Validation Status: Level 2 Validation

Then select: FTED-001 Detail (report)

Click on link (FTE-001 FTE Detail) to download the zip file

Open

(If it does not open, click on SAVE AS and get (FTED-001) FTE Detail-IRN-FY)

Double click to get an Excel spreadsheet

Sort the Excel spreadsheet by SSID numbers

– Position student names before SSID numbers

Only the following columns are needed for the FTE review
(the other columns should be blocked out)

Rpt Dist IRN
Name (last, first) – not middle
SSID
LEA IRN
FTE Start Date
Legal Dist of Res IRN
Orig FTE
Adjstd FTE
Grade Level
Spec. Ed. Cat
Econ Disad Flag
FTE End Date

TOPICS / ISSUES
Related to FTE Reviews of
Community Schools
(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 Revised Code, are entitled to attend school in the district in which they reside.”*

[ORC 3313.64\(F\)\(1\)](#) places three conditions which must be met in order 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 the ORC definition of a parent; therefore, the student does in fact live apart from the parents.

AG opinion 2014-026 states that the phrase “supports themselves by their own labor” means to finance or otherwise facilitate the furnishings of the necessities of life, including food, shelter, and clothing, by means of their own physical or mental effort. The phrase does not apply to a person who depends upon another for support. A person may also receive imputed income, meaning that other compensation besides wages can be considered in making a determination of self-sufficiency. Previous AG 74-076 has been superseded by AG-2014-026.

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 resides. A student’s receipt of SSI income is considered to represent support by one’s own labor. The third condition of not completing the high school curriculum is presumed to be met.

Coordinators are not attorneys and can only provide an opinion. Our opinion is that because the 18-year-old student/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.

105 Consecutive Hours of Unexcused Absence Rule

[RC 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 105 consecutive hours of the learning opportunities offered to the student.*

The 105-hour rule does not apply after the last day that a community school was in session, and students are to be withdrawn on the last day of documented attendance, especially when a community school closes.

In order 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 105 in order to determine how many instructional days the 105 hours represents
- 3) determine the student's last day of actual attendance (or excused absence)
- 4) count forward from that last day of attendance the number of instructional days in no. 2 above
- 5) that should be the student's End Date in ODDEX.

A partial day of attendance may be used to on the last day that a student is enrolled.

When computing the 105 hours, calamity days should be excluded, whereas make-up calamity days would be included.

Attendance

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 participation in learning opportunities by a student enrolled in an eSchool or a school authorized to use blended learning models (see Learning Opportunity Documentation Requirements for eSchools and Learning Opportunity Documentation Requirements for Schools with Authorized Blended Learning Models). It does not include days on which only the following activities occur: enrollment or orientation activities.

The Office of Quality School Choice has stated that orientation or orientation activities, which usually occur near the beginning of a student's enrollment in a community school, may not be counted in a student's hours of receiving instructional services; the student's "Start Date" does not include such orientation days.

Attendance, Documentation of

The school must provide documentation that clearly demonstrates that the pupil has commenced participation in learning opportunities, either through attendance or evidence that a student in an eSchool has logged into the system. (See "Computerized Attendance Record" and "Original Source Documents" and Learning Opportunity Documentation Requirements for Schools with Authorized Blended Learning Models)

Blended School

Community schools using a blended learning model are permitted under the law. A blended learning model is one where some instruction is delivered at the community school (e.g. in the community

school's brick-and-mortar structure) and some instruction is delivered online wherein students have some control over the time, place, path, and pace of their learning.² The community school delivering blended instruction must so notify the Department by July 1 of a school year.

If the reviewer determines that the community school is operating as a blended school, the reviewer should note this in item #8 of the FTE Review Checklist and in the letter which is sent to the community school with copies to others after the FTE review visit.

Calamity Days

[RC 3314.08 \(L\)\(4\)](#) With respect to the calculation of full-time equivalency under division [\(L\)\(3\)](#) 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 above in [ORC 3314.08 \(L\)\(4\)](#), then the community school is not required to make up any hours or days for this closure provided the minimum number of 920 hours (in days or hours) is provided. If the number of hours drops below 920, the number of hours needed for students to be provided with 920 hours must be made up.

Calamity days may not be included in a student's number of instructional days or hours when these are reported in the ODDEX system. They also may not appear in the computation of the 105 hours or equivalent days which occur before a student's withdrawal for unexcused absences.

Charging Enrollment to a Public District

If a community school has proof of residency for a child who has previously 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 that it has verified that the child (parent) does not reside at the address listed in ODDEX.

² See O.R.C. 3301.079(K)(1): "Blended Learning" means the delivery of instruction in a combination of time in a supervised physical location away from home and online delivery whereby the student has some element of control over time, place, path, or pace of learning.

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 concerning the non-residency of the child, and that record may not be flagged by the public district if it previously reviewed the record without error; the second record at the same address as previously reported may be flagged by the public district. 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 upon the initial enrollment of the child, after the beginning of the school year because it has **verified*** that 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*** that a child (parent) does not reside at the address listed in ODDEX and imposes an 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," and 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 public district within 30 days that it has to pay for the enrollment of the 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."

Closing Procedures

The Office of Quality School Choice has issued a separate document entitled "Procedures for Closing/Suspended Community School" which describes for community schools and for sponsors what is to be done with student records when a community school closes.

Computerized Attendance Record

If a community school presents a computer printout of attendance, it must have original source documents that show the source of the information of the computer printout, i.e., teachers' daily attendance/absence lists, teachers' grade books, student sign-in sheets, etc. If an absence-only list is provided, it must be accompanied by the total class list of that teacher.

If the source of the computer information is the teacher personally, then the computer printout itself is the original source document. In such a case, the community school must identify which staff member(s), in addition to the teacher, have access to the attendance system and are able to make any changes in attendance data. Any changes made by staff members other than the classroom teacher must be documented in a separate log. An example would be an office clerk who changes an absence to a tardy based on a late sign-in sheet.

If an office staff member records attendance into 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

The community school ODDEX reporting system is the primary means for community schools to report enrollment for funding purposes. As a result, resolving traditional public school district challenges to students reported as enrolled by community schools is an important ongoing process throughout the year.

One facet of the FTE review site visit includes an examination of the student records that have been flagged by traditional public schools. Appendix B of the FTE Review FTE Review Handbook identifies the reasons for a fatal error flag to be placed on a student record. The importance of timely and appropriate communication between traditional public school districts and community schools cannot be overemphasized.

The burden is 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 public school district has the right to use the ODDEX system irresponsibly to deliberately report incorrect information or demand unnecessary information. Each school has a right to feel confident that appropriate documentation exists to confirm accurate enrollment and attendance reporting. Each community school must adhere to all applicable statutory requirements with respect to enrollment of students. If the schools cannot resolve issues on their own, it is the 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 in order to resolve the issue. After reaching a decision, the area coordinator will communicate the decision to all parties involved.

Schools may be directed to remove a status flag or modify the student's information. Failure to do so may be reported to the CS payment administrator for possible overrides in the SOES system, and based on the circumstances, to the director of Finance Program Services 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 enrollee'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

It is the school district where a child's parent(s) or grandparent (under HB130) resides.

For a student residing in a home, it is the school district determined by ORC 3313.64 and by [ORC 3323.01\(M\)](#) concerning where the residential custodial parent resides or resided or the school district named in a court order or as revised using the DRC (district of residency change) process.

It is the school district where an 18-year-old student resides who is supporting himself/herself by his/her own labor, or who is the recipient of government benefits or of an inheritance.

For a homeless student it is the school district where the student is residing or has resided (See Homelessness).

Enrollment in a Community School

For the purpose of this guidance, admission and enrollment have the same meaning – that is, students attend a traditional district building or community school where they receive educational instruction and count for funding.

Community schools are public schools of choice, part of Ohio's program of education (Ohio Revised Code (ORC) [Section 3314.01](#)). Community schools are required to adopt a policy regarding the admission of students that does one of the following:

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

A community school's admission policy must also declare that it is open to any student entitled to attend school per 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 shall admit students by lot if the number of applicants exceeds the school's capacity. The only exceptions to admission by lot are that preference shall be given to students attending school the previous year, or who reside in the district in which the school is located; and preference may be given to siblings of students who attended in the previous year.

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

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

Error Flags, District Use of

Traditional public districts have an obligation to protect the resources of their districts. As part of this obligation, the traditional public district must review the data recorded in SOES by community schools to assure that payments made by the district for enrollment of students in community schools are appropriate. The review of data by traditional public districts must be at least monthly and within the guidelines for such reviews.

A traditional public school district may not impose an error flag on a new community school enrollee until proof of residency is provided by the community school. The community school is under obligation to obtain proof of residency when it enrolls the child, and per [ORC 3314.11\(A\)](#) the public district must verify that residency of the student. If the public district verifies that a student does not reside at the address provided by the community school, the community school must provide the public district with documentation of the student's residency.

eSchool

[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 section 3314.086 Orc 3314.086..*

Commencing of Instruction in an eSchool:

[ORC 3314.08 \(H\) \(2\)](#) – *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 Ohio Revised Code.*

An eSchool is a community school where students receive instruction by way of the Internet- and a computer-based instructional method and where a student is taking its defined courses.

Foster Children

(See Custodial Pupils/ Foster Children)

FTE: Full-Time Equivalency

That portion of the school year a student was educated, as determined by the number of hours of instruction provided to a student during a school year divided by its annual membership units (the total number of hours of instruction which a community school must provide during a school year in accordance with its contract with the sponsor, as listed in the community school’s annual school calendar in EMIS).

A student who enters at the beginning of a school year and is instructed 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 FTE’s 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.

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,” i.e. 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

See “Questions and Answers” section at the end of this Handbook.

Homelessness

The federal McKinney Vento Act mandates that a homeless child may attend school in the district 1) where the student is staying currently, 2) where he/she last attended school or 3) where he/she last had permanent residency. When a homeless child enrolls in and attends a community school, the district to be identified as the resident district is as follows: if the child was previously enrolled in a community school, the previous resident district remains the resident district; if the child newly enrolls in a community school when he/she becomes homeless, the resident district is the district where he/she is currently staying while he/she is homeless.

The McKinney-Vento Act defines homeless youth as “individuals who lack a fixed, regular, adequate nighttime residence... and includes children and youth who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason”

A public district should follow its own (adopted) policy for a community school enrollee. A non-residency flag for homelessness is inaccurate and inappropriate.

A district may impose an error flag in SOES on a homeless child’s record in order to challenge the child’s homeless status. It is entirely reasonable to ask the owner of a residence where the family is doubling up to sign a statement that the homeless family (youth) is residing there. If a dispute arises over the school assignment or enrollment, the homeless student will be immediately enrolled and assigned to the school in which enrollment is sought. The homeless liaison of the community school should confer with the homeless liaison of the applicable resident district to determine the homelessness involved in the situation. While a residency dispute exists, the reviewer or the area coordinator should refer the parties to the Department of Education’s Homeless Liaison to resolve the residency dispute.

Instructional Day

The instructional day for a community school is defined in the school’s contract with its sponsor: 1) it may be the time between when students come in and when students leave, or it may be the time when instruction begins and when instruction ends, 2) it may be accomplishment of specified activities and completion of certain tasks by students who are working on 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](#) states:

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. Just 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 recess and time for changing classes, but not the lunch period. For students in eSchools, credit can be given within the parameters of ORC 3314.27 and documented according to the parameters for Learning Opportunity Documentation Requirements for eSchools. Students are able to earn credit on evenings, weekends, holidays, etc.

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

IEP Records

See Special Education

Juvenile Detention Center

If a community school enrollee enters a Juvenile Detention Center (JDC), the student must be withdrawn from the community school if the district where the JDC is located provides educational services at the JDC. 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 JDC, 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 by October 1 if the community school has an accelerated policy for admitting the child and the child met the requirements of that acceleration policy. For a child who will not turn five years of age until after December 31st, the child must have met the requirements of an ODE approved policy that involves having passed the Iowa test.

The community school will not receive funding for the student until the child's fifth birthday because a community school may receive funding only for students ages 5-22.

No Show

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

1. Enroll and are expected to attend, but do not attend even one day or never logged into an eSchool's instructional program after the start of a school year, and/or
2. Attended last school year, finished the 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 eSchool, logged into the system, the pupil will not be considered as enrolled in that school year. This applies to both new students who enrolled before the start of a school year and to returning students from the previous school year. In either case, if there is no evidence that a student has attended or logged in, the 105-hour rule does not apply [\(ORC 3314.08 \(H\)\(2\)\(c\)\)](#).

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 105 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.

ODDEX Reporting

Ohio District Data Exchange (ODDEX) is the primary application for a number of smaller applications districts will use for data verifications and exchanges, such as SOES and SCR.

Original Source Documents

Different sets of documentation are reviewed during the FTE review process:

- Enrollment and attendance policies;
- Enrollment records;
- Withdrawal records;
- Computer acquisition records (eSchools); and
- Attendance records.

A sign-in sheet must include both a "Time In" and a "Time Out," which are filled in.

For enrollment, withdrawal and computer acquisition, the original source documents are the enrollment applications, withdrawal statements and computer acquisition forms signed by parents or responsible adults.

Original source documents for attendance are the teacher attendance rosters /grade books, teacher class lists, sign-in sheets, log in records, learning opportunity documentation records, etc. on which the student's attendance is recorded by the person who sees the student daily. For eSchool students and blended learning students, see the "Documentation of Learning Opportunities for eSchools" and "Documentation of Learning Opportunities for Schools with Authorized Blended Learning Models" sections in this manual. For permitted educational options such as credit flex, 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 documentation presented to prove attendance must indicate attendance, not only 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 DASL 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 or indicate what will be appropriate documentation of instruction and attendance and what other documentation is needed as original source documents.

Preschool Students

Community school students are allowed to have preschool students; however, preschool school 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 that includes what it accepts for proof of residency; if it does not, the proof of residency must be the proof of residency that is requested by the child's district of residency.

ORC 3314.11(F): For purposes of this section, the following documents may serve as evidence of primary residence:

- (1) A deed, mortgage, lease, current home owner's or renter's insurance declaration page, or current real property tax bill;*
- (2) A utility bill or receipt of utility installation issued within ninety days of enrollment;*
- (3) 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;*
- (4) The most recently available bank statement issued to the parent or student that includes the address of the parent's or student's primary residence;*
- (5) Any other official document issued to the parent or student that includes the address of the parent's or student's primary residence. The superintendent of public instruction shall develop guidelines for determining what qualifies as an "official document under this division.*

Such proof of residency should be collected at the time of enrollment and should follow the community school's written policy. 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 which 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 prior to 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 new community school student is a returning student, i.e., the student previously attended EdChoice or a district school, the district may require proof of residency only if it requires updated proof of residency for its own returning students.

If a community school student is over 18 years of age, it must be determined whether he/she is self-supporting or self-supporting. (Homelessness is addressed separately.) If the student is self-supporting, he/she is entitled to enrollment in the district where he/she is residing (see definition of 18-year old living apart from parent. If the student cannot prove that he/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 public 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. Where there are differences with regards to proof of residency (POR), then the policy of the traditional district or community school in which the student is enrolled prevails. For example, if a student for whom district A is the resident district enrolls in a community school whose admission policy 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.

ODE, traditional districts and community schools all have an obligation to assure that the law is followed in each particular case. Traditional public school districts and community schools have valid reasons for investigating residency issues that may involve more than the "standard" POR, 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. Resident districts are not to impose flags on students in SOES for lack of POR consistent with the resident district's policy. It is perfectly reasonable for the resident district to ask for a copy of a community school's enrollment policy, if not already provided by the community school.

ODE's area coordinators are available to assist with district residency determinations. Examples of appropriate POR's for verification of student's entitlement to attend either a community school or a traditional public school district building are items such as those listed below. These items must be current and include a street address; a P.O. Box address cannot be used to validate residency records.

A list of acceptable proofs of residency is listed in Ohio law cited above on page 40.

ODE advocates cooperative relationships and open lines of communication between community schools and resident districts to ensure that all of 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 PORs for transportation purposes follow that of the resident district's policy. Resident districts may require the same POR from community school students as required of students attending the traditional district's schools.

Residential Care Facility, Pupils Residing in

Section 263.430 of H.B. 64: 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 by the community school.

SCR

The Student Cross Reference (SCR) application is to be used by all EMIS reporting entities as a means to verify enrollment for funding. Within SCR, districts will see records for students they have submitted data for. When conflicts are determined, any district linked to the conflict will also 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 SCR 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 Landing Page. 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 community school where its students receive instruction in a brick-and-mortar facility.

SOES (School Options Enrollment System)

A communications system between community schools and traditional public districts wherein a public district is notified concerning which residents of its district are enrolled in individual community schools. The public district is able to impose fatal error flags for specific reasons and can communicate with a community school concerning “Data Quality Issues”.

The 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 and determine whether the student is truly a resident of their district and approve or set contention flags. The application allows the charter and STEM districts to view resident district comments and flagging values. In addition, if there is ODE involvement for a particular student, that also is visible to all districts associated with the student SSID.

Information about SOES being populated by EMIS can be found in the EMIS Manual.

<http://education.ohio.gov/Topics/Data/ODDEX/ODDEX-Documentation/Current-ODDEX-Manual>

SOES 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, for example, when a traditional public district will not remove an error flag or when a community school will not correct a date in SOES, an IEP date, or a student’s withdrawal date. In such instances, the area coordinator will contact the CS payment administrator; give only the SSID number(s) involved and the circumstances necessitating a correction. This may occur any time during the school year, although final notification for a school year must be given to the CS payment administrator before July 31 of each year.

Special Education Students

IEP Records

The FTE reviewer must confirm the validity of the IEP for selected enrollees with a disability. The community school must have required documentation, especially an IEP which is signed by a parent or by a student who is at least 18 years of age or which meets the requirements for an IEP which is not signed. The IEP must be dated within the current school year to be eligible for funding (see FTE Review Checklist, Checklist Item #10).

Effective IEP date

Community schools receive special education supplemental funding for that part of each school year for which a child with a disability has a valid IEP.

The effective IEP date is identified on the front of the IEP. It should be the date of the parent's signature near the back of the IEP, or of a student's signature if over 18 years of age, or of the effective date that the parent agreed to if the effective date of the IEP is subsequent to the parent's signature, or in the absence of a parent's signature documentation of three attempts to have parents sign if it is a reevaluation.

Start Date/From Date

[ORC 3314.08 \(H\) \(2\)](#) – *A student shall be considered to be enrolled in a community school during a school year 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 30 days prior to the date on which the student is entered into the Education Management Information System.... 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 105 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 \(H\) \(2\)](#) and ORC 3314.08 (N) (1). 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); or
- c) For an eSchool, the date the student has received all required hardware and materials and all items are operational.

The entry date (or "Start Date") is considered to be the date on which the community school both has received documentation of the student's enrollment from a parent and the student has commenced participation in learning opportunities each school year. 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 into the ODDEX system (ORC3314.08(L)(2)).

For an eSchool student, the "Start Date" would be the first day of login. The entry date for a new eSchool student is determined by when the school has received proper enrollment documentation, all required hardware and software materials have been provided by the school, all such materials are operational and the student has commenced learning opportunities (RC3314.08(N)(1)). Verification that the necessary equipment has been provided will be checked during the on-site FTE Review visits. To assist

with establishing the proper entry date, the reviewer also will verify that the student has logged into the system.

For a student who was enrolled in a site-based community school during the previous school year, who was expected to return in the following year, and who was rolled over into the current year's SOES, the "Start Date" is his/her first day of enrollment in the new school year. The 105-hour rule for automatic withdrawal does **not** apply from a student's last day of attendance in the previous school year, but from the first day of enrollment in the new school year.

Total Membership Units

The number of days or hours of instruction which the community school will provide during a school year, as indicated in its contract with the sponsor.

Truancy

If a parent says that a child is withdrawing to a community school and the public district does not receive a request for records from the community school where the student is supposed to enroll, the public school district is responsible for reporting truancy. Once the community has received paperwork for enrollment or the student has logged in, the community school is responsible for truancy.

[ORC Section 3321.191](#) requires schools to follow up on truancy or to file a complaint in the juvenile court in the county if the parent, guardian or other person responsible for the care of the child fails to cause the child's attendance during the time the child is enrolled in the community school or in the 105 consecutive hours of non-attendance prior to the required withdrawal of the child. Once the 105 hours of non-attendance has lapsed and the child is no longer enrolled in the community school, the child's traditional public school where he/she is entitled to attend is responsible for truancy.

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 105 hours of unexcused absence may be used in determining the "End Date," a partial day of attendance in meeting the 105-hour requirement is possible. (See: 105 consecutive hours of unexcused absence rule)

If a student is suspended and learning opportunities are not provided, then expelled when the suspension ends, the End Date is the last day when learning opportunities were provided to the student; the 105-hour rule does not apply in this situation.

If a community school enrollee enters a Juvenile Detention Center (JDC), the student must be withdrawn from the community school if the district where the JDC is located provides educational services at the JDC. 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 JDC, but this decision must be made jointly between the district of residence and the community school.

The 105 consecutive hours rule may be used to determine the End Date for a student and 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

This date also may be due to a forced withdrawal dictated by the non-attendance provision in [ORC 3314.03\(A\) \(6\) \(B\)](#) that reads as follows: *A requirement that the governing authority adopt an attendance policy that includes a procedure for automatically withdrawing a student from school if the student without a legitimate excuse fails to participate in 105 consecutive hours of learning opportunities offered to the student. A partial day of attendance may be used in meeting the 105-hour rule.*

The last day that the child attends/ is enrolled is entered in ODDEX/SOES 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/she is self-supporting) has not advised the school that he will be withdrawing, the community school must disenroll the student on the day that represents 105 hours of unexcused absence; no more than 105 hours is permissible even if the last day of enrollment is a partial day so as not to exceed the 105 hours.

Appendices

Appendix A

Resolution Process for Error Flags

Community school students are not required to register at their local districts.

The community school has the responsibility of obtaining some form of proof of residency upon enrollment. This documentation should be used to confirm either the home address of the residence where the child is residing or the home address of a self-supporting student. It should be confirmed that the information included in the documentation agrees with what has been entered in the ODDEX system. Such documentation must be current and may include:

- Voter registration card;
- Utility bill (electricity, gas, water/sewer, residence phone, cable/satellite TV);
- Real estate tax bill;
- Bank statement;
- Rent receipt;
- Documented affirmation of parent(s) address from district of residence where parent(s) currently resides;
- Notarized affirmation from parent(s) 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 parent(s) current address;
- Written confirmation from a local law enforcement agency of the parent(s) current address.

An example of documentation that may not be appropriate would be a driver's license, since the student's actual residence may change, but the address may not be changed on such a document.

For a child authorized to attend school in a district other than the parents' district of residence, the community school shall be provided with documentation of that child's status including guardianship, custodianship or the other circumstances authorized under [ORC 3313.64](#).

If the resident district has a valid reason to question the address, it shall clearly communicate that reason. The community school shall make an attempt to reconfirm the information it obtained during the enrollment process. The community school shall ask the parents to provide some written document with their signature that acknowledges that the address information provided upon enrollment is current and still valid and that the student still resides with the parent. If acceptable documentation was not obtained at registration, the community school shall attempt to get some type of written documentation and verify that the information is valid.

Most county auditor offices in Ohio have a program that can associate a resident school district to an address. If reasonable documentation can be provided to confirm the address and/or district of residence, the community school shall advise the resident district that the address is valid, no matter what other information the resident district obtained. While not required to provide the information to

the resident district the community school should be encouraged to do so. If the resident district requests verification before removing the flag, the area coordinator may ask the community school to provide the documentation that verifies the residential status and, if needed, visit the community school to review the documentation. If the documentation is appropriate, the area coordinator shall advise the public school to remove the flag.

Failure to do so may be reported to the CS payment administrator for possible overrides in the SOES system.

Other Potential Fatal Errors outside SOES

While the errors identified above are those that districts are able to flag within the SOES system, there are other errors that also need to be identified and addressed during the reviews.

QUESTIONS and ANSWERS

- Q. If a community school has a limited enrollment area built into its contract, but admits a student from outside the enrollment area, can the payment for the student be deducted if the situation is discovered in a review, even if it can be documented that the community school educated the child?**
- A.** Payment for this student can be deducted from the community school because the community school shall not be enrolling students from outside its enrollment area. It shall work with the sponsor and with the Office of Quality School Choice to get its contract modified if it wants to expand its area of enrollment.
- Q. Can a community school require student attendance records from a traditional public school?**
- A.** A traditional public 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 that the students in question were last educated by the district. If the students were enrolled and attending a community school and enrolled and attending a public school district building at the same time, the community school is entitled to be paid for the students. If a community school and a public school district cannot resolve the disagreement, then area coordinators have to review the documentation that both schools have and decide what date to use.
- Q. If a student is receiving “home instruction” and the school provides five or more hours of service in a single day or a single week, does the school get credit for a week’s worth of instruction hours?**
- A.** If the student has an IEP that requires “home instruction”, the school would receive credit for a full week of attendance/instruction. This position is consistent with practice in traditional public districts.

Additional Checklist Guidance

Checklist Item #2: Scheduling the Review

Schools should have the following policies, procedures and documents ready before for the FTE review:

- an FTE Detail Report of students generated by the community school in the format described in "Obtaining a List of Students" (see page 27)
- The school's written enrollment and attendance procedures
- For each child:
 - a) Birth certificate
 - b) Proof of residency;
 - c) Enrollment form;
 - d) Withdrawal form, if applicable;
 - e) Proof of attendance (original source document);
 - f) For a special education child, the Evaluation Team Report (ETR) and the current IEP

Prohibition for leaving with Individual Student Names and SSID Numbers

[RC 3301.0714\(D\)\(2\)](#) – *Individual student data shall be reported to ODE through the information technology centers utilizing the code (SSID) but, except as provided (for EdChoice, Autism Scholarship, Cleveland Scholarship and DD students)...at no time shall the State Board or the Department have access to information that would enable any data verification code to be matched to personally identifiable student data. (This means that neither ODE nor any of its staff may leave an FTE review site with personally identifiable information.)*

See page 27 for instructions on how to run the FTE Detail Report needed for the review.

Checklist Item #4: Checking the School Calendar against the School's Operations

During the orientation visit and/or during the FTE review visit, the information in a community school's calendar (obtained from EMIS records for the school) and the officially adopted by the school calendar should be checked for accuracy against the community school's operations for that school year, including:

- Beginning and ending dates for students are correct;
- Number of annual instructional hours for students are correct and are distributed proportionately across the school's calendar year considering school breaks;

- Each school day contains the number of instructional hours needed to meet daily or annual requirements, as stated in the contract;
- Each school day contains the number of instructional hours indicated in EMIS and in the hard copy of the annual school calendar, not counting the lunch period.

Checklist item #4: Checking the Actual School Day Against the School Calendar

The law requires the school calendar to report the total hours as the “total learning opportunities offered by the community school to a student who attends for the school’s entire school year.” For community schools which operate on days, the daily number of hours times the number of days on which students are in attendance must total at least 920 hours. If few, or none, of the students actually spend the number of hours at the school outlined in the annual calendar, however, the reviewer must determine if the school calendar is actually correct. Each school day must offer the same number of hours per day unless it is an eSchool or school authorized to use a blended learning model.

Community schools (except for Internet or computer-based schools) that fall below the 920-hour minimum may use online instruction to make up a maximum of three equivalent days of instruction ([ORC 3313.88](#)). In conjunction with online posting of lessons, districts may use “blizzard bags,” which contain take-home work for students without access to home computers. The online instruction option is open only to schools that submitted related plans by August 1. Documentation of a community school’s use of “blizzard bags” would have to be provided by the community school. A notation of such use should be indicated in the FTE Review Report Form and in the letter of the FTE review.

Checklist Item #10: IEPs

When conducting an FTE review, the area coordinator will confirm the validity of the IEPs of selected students, their effective dates, and their disability categories by confirming that:

1. There is a signed ETR designating the student’s disability that is not longer than three years old and that the disability category is listed correctly on the FTE Detail Report. Without an ETR, the IEP is not valid.

On the ETR forms (revised by ODE on Oct. 10, 2009), the disability of the child is listed on Form #4, page 7, in the middle of the page: “The child is eligible for special education and related services in the category of:_____”

2. The reviewer should check the validity of the IEP for funding. All three of the following items must be answered as “Yes” in order for an IEP to be valid for funding:
 - a) The IEP is in effect for the current school year.
 - b) The IEP is signed by a parent or guardian, or there is a log of three attempts to obtain the necessary signature.

- c) The student's enrollment date is correct.
- 3. If the effective date on the front page of an IEP is different from the date that a parent indicates on the signature page that the parent has signed it, the official IEP date to be used is the effective date on the front of the IEP, since it is that date which should be the beginning of implementation of that particular IEP. If there is a large discrepancy between the two dates, this should raise a red flag for the reviewer and lead to further inquiry concerning the reason for the discrepancy.
- 4. Electronic ETR's and IEP's are satisfactory if they are on a secure server that is accessible to authorized personnel. There must be evidence that the parent signed the document electronically, and the FTE reviewer should check to verify how this was done and that it was done.
- 5. If an IEP is generated, either in a public school 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 called together the full IEP team and reviewed and altered almost the entire document or changed the child's disability category, then the date of the modified IEP is the effective date. The community school must enter the modification date in EMIS.
 - b) If the community school simply agreed to accept the IEP as is or made minor changes to certain parts of the document, but did not review the entire document, then the original date stands.

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

- 6. If during the FTE review the reviewer discovers a student 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, then the school would get credit only for the number of hours of service provided. If "home instruction" is in the child's IEP, an entire week's worth of attendance may be credited.

Checklist Item #8: Non-Classroom Learning Opportunities

Determine whether students in a brick-and mortar building routinely engage in any non-classroom learning activities. If so, determine if the non-classroom activities are:

- 1) Non-classroom activities which may be some out-of-home supervised instruction together with some online instruction; and
- 2) Only online instruction but not classified as an eSchool under Ohio law.**

If **non-classroom activities** are used by students, participation in learning opportunities must be documented per pages 19 and 20 of this manual. Whatever method of supporting documentation is used by the community school should be noted in the issues section at the bottom of the FTE Review Results

form and in the follow-up FTE review letter that results from the review (item #16). If there are perceived issues, this should be communicated to the Office of Quality School Choice and to Office of Budget and School Funding (item#14). Schools should only receive funding for 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 eSchool under Ohio law** ** (no. 2 above), the procedures for providing supporting documentation as indicated above for “non-classroom activities” would be appropriate.

Checklist item #8 e-m:

If a community school is designated as an “Ohio online community school” on the ODE website, i.e. an eSchool, the Checklist attributes in “e” through “m” should be reviewed.

**Community schools which have been designated as official eSchools under Ohio Law are listed as [“Ohio online community schools”](http://education.ohio.gov/Topics/Quality-School-Choice/Community-Schools/eSchools) on the ODE website at

<http://education.ohio.gov/Topics/Quality-School-Choice/Community-Schools/eSchools>

Checklist Item #14:

The review records that are filed should include at a minimum:

- 1) the post review visit letter
- 2) documentation of making arrangements for the FTE review visit
- 3) the school’s entity annual calendar with any notation made during the review
- 4) the FTE Detail Report listing of SSID numbers with notations
- 5) Total of learning opportunities documented from sample (see learning opportunities documentation requirements in Item 8)
- 6) the FTE Review Report form
- 7) issues communicated to other departments

FY17 FTE Review Checklist and FTE Report Form

Community School Full-Time Equivalency (FTE) Review

Community School:	
IRN:	
Review Period:	
Region:	
Area Coordinator:	
Review Date:	

Objective: To conduct a review of community school enrollment data and supporting documentation to ensure appropriate funding is calculated for both the community school and the traditional public school district.

ITEMS 1 -5 SHOULD BE DONE PRIOR TO THE ON-SITE FTE REVIEW IF POSSIBLE

Item 1: ODE Contacts prior to FTE Review

Questions	Responses/Findings
Contact the Office of Quality School Choice and the CS payment administrator to determine if there are any additional issues that can be addressed during the community school review. ³	

³ Contacts may be combined; however, it is important to ensure that the latest information about a community school is obtained by the area coordinator.

Date of contact with OCS	
Date of contact with CS Payment Administrator	
Suggested issues to be reviewed, if applicable	
Additional Notes/Issues	

Item 2: Scheduling FTE Review

Questions	Responses/Findings
<p>Schedule a meeting with the community school to conduct the FTE review. Communicate the following information by e-mail or by other means:</p> <ul style="list-style-type: none"> • The date and time agreed upon for the review; • A list of policies and documents needed for the review; • Instructions to the community school on how to run the available FTE report needed for the review. 	
With whom was the meeting scheduled?	
Is a copy of the notice attached to this Checklist?	<div>YES</div> <div>NO</div>
Additional Notes/Issues	

Item 3: Copies of Enrollment/Attendance Policies and Contract

Questions	Responses/Findings	
<p>Obtain a copy of the enrollment/attendance policies and procedures and document any concerns or issues on the FTE Review Report Form.</p> <p>Indicate where enrollment and attendance policies are located:</p>		
Obtain a copy of the school contract and document any concerns or issues on the FTE Review Report Form.		
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
Additional Notes/Issues		

Item 4: Calendar Information

Questions	Responses/Findings	
Obtain a copy of the school calendar as reported to EMIS and the officially adopted school calendar.		
Is the school calendar in EMIS available?	YES	NO
Do the calendars match the school's operations?	YES	NO
Additional Notes/Issues		

Item 5: Random Selection of Student Records

Questions	Responses/Findings
<p>At least 5 days prior to the review, contact the CS Payment Administrator. He will obtain a specialized FTE Detail Report that selects the random sample of students to be reviewed and will email this to the area coordinator. Random samples will adhere to the following selection criteria (area coordinators do not need to select any records):</p> <p>a) 25% of the sample (regardless of total sample size), must be students coded with a disability status on the FTE Detail Report.</p>	

<p>b) For schools with fewer than 300 records, select a minimum of 25 records.</p> <p>c) For schools containing between 301 and 2,000 records, select 8% of student records, with a minimum of 25 records selected. If the list contains more than 1000 records, 50% of the SSID numbers selected may be given to the school two business days prior to the FTE review visit.</p> <p>d) For schools containing between 2,001 and 4,999 records, select 8% of the student records, with a minimum of 160 records selected. 80% of the SSID numbers selected may be given to the school two business days prior to the FTE review visit.</p> <p>e) For schools with 5,000 or more records, select 5% of the student records, with a minimum of 400 records selected. 80% of the SSID's selected may be given to the school two business days prior to the FTE review visit.</p>	
Number of Students:	
Sample Size:	
<p>During the review, give the school the random selection of SSIDs in order for them to pull the necessary documentation for the review.</p> <p>Schools must be ready to match the SSID's on this report with student names as necessary.</p> <p>For schools that are closed, closing, or suspended, the selection must follow the standards found in this item.</p>	
Full-year and partial year regular students?	<div>YES</div> <div>NO</div>
Full-year and partial-year special ed students?	<div>YES</div> <div>NO</div>
If "No," state why.	

Additional Notes/Issues**Item 6: Preschool and Kindergarten Enrollment**

Questions	Responses/Findings		
If the school has kindergarten enrollees, did any kindergartners in the sample become 5 years of age beginning October 1 st ?	YES	NO	
If “yes” to the question above, does the school have a written acceleration policy and did the early-age kindergartners meet the requirements in that policy for enrollment?			
If any kindergarten enrollees are on-half day only, are they reported in EMIS as K-2?	YES	NO	NA
Does the school have preschool students?	YES	NO	
Please note that community schools do not receive funding for preschool students.			
If “yes” to the question above, does the school’s contract allow them to have preschool students?	YES	NO	
Additional Notes/Issues			

Item 7: Source Documents and Attendance

Questions	Responses/Findings	
Using the list of SSID numbers selected in Item 5, have the school pull the student record files and the attendance records for review. ⁴		
a) Does each student record file in the sample contain: 1) an enrollment form; 2) birth certificate; 3) proof of residency; 4) if applicable, a withdrawal form?	YES	NO
b) What are the original source documents that verify attendance?		
c) Do the attendance documents support the Start Dates and End Dates listed in the FTE Detail Report?	YES	NO
Additional Notes/Issues		

⁴ Reasonable documentation of the delivery and setup may be reviewed, including packing notice, delivery schedule notice, etc.

Item 8: Eschool and Blended Learning Reviews

Questions	Responses/Findings		
Is this school an authorized eSchool or school authorized to use a blended learning model per the community school contract?	eSchool	Blended Learning Model N/A	
Is each student's total instructional day spent in a brick-and-mortar building?	YES	NO	
If "Yes," is the school's classroom instructional program mainly computer-assisted instruction?	YES	NO	NA
COMPLETE THIS SECTION ONLY IF THIS IS AN AUTHORIZED ESCHOOL THIS SECTION TAKES PLACE AT THE SCHOOL DURING THE REVIEW			
a) Is there an accounting of hours of online – system based learning opportunities for the sampled student records? If yes, randomly select 50 of the reviewed records by SSID and document the total amount of time in a spreadsheet ⁵	YES	NO	
b) Is there an hourly/daily/weekly/monthly accounting of "Other Learning Opportunities"? If yes, document the total amount of time in a spreadsheet for the same students randomly selected in 8a. ⁶	YES	NO	
c) If yes to 8b, does it meet the documentation requirements outlined in	YES	NO	

⁵ If less than 50 records are being sampled, total up for all records. For example, if 25 records are being reviewed, then total up this time for all records.

⁶ If less than 50 records are being sampled, total up for all records. For example, if 25 records are being reviewed, then total up this time for all records.

the FTE Review Manual including the certification requirements (p. 22-23)		
d) Request the school email the Total Learning Opportunity Records (TLOR) per p. 16-17 of the FTE Review Manual within 5 business days of the completion of the FTE Review. Was this requested?	YES	NO
COMPLETE THIS SECTION ONLY IF THIS IS AN AUTHORIZED ESCHOOL THIS SECTION TAKES PLACE AFTER THE FTE REVIEW		
e) Add the total amount of documented time from 8a and 8b by SSID and document it in a spreadsheet. Was this completed?	YES	NO
f) Calculate FTEs for the sampled SSIDs from 8e. Was this completed?	YES	NO
g) Did the school send the TLOR per 8d? If yes, calculate FTEs by SSID for all records based on the TLOR (see guidance on pp.16-18, 21)	YES	NO
h) Compare the calculated FTEs from 8g against the FTEs reported in the most recent FTE Detail Report. Do the FTEs match? If no, document the difference.	YES	NO
i) By SSID, compare the FTEs calculated from the sample in 8f against the corresponding FTEs in 8g. Did they match? If no, document the difference.	YES	NO

**COMPLETE THIS SECTION ONLY IF THIS IS A SCHOOL AUTHORIZED TO USE
A BLENDED LEARNING MODEL**

THIS SECTION TAKES PLACE DURING THE FTE REVIEW

j) Is there an accounting of hours of online – system based learning opportunities for the sampled student records? If yes, total up the time for at least 50 of the reviewed records by SSID and document it in a spreadsheet. ⁷	YES	NO
k) Is there an hourly/daily/weekly/monthly accounting of hours of “Other Learning Opportunities”? If yes, total and document the total amount of time in a spreadsheet for the same students randomly selected in 8j.	YES	NO
l) If yes to 8k, does it meet the documentation requirements outlined in the FTE Review Manual including the certification requirements (p. 24-25)	YES	NO
m) Request the school email the Total Learning Opportunity Records (TLOR) per p. 25 of the FTE Review Manual within 5 business days of the completion of the FTE Review. Was this requested?	YES	NO

**COMPLETE THIS SECTION ONLY IF THIS SCHOOL IS AUTHORIZED TO USE A
BLENDED LEARNING MODEL**

THIS SECTION TAKES PLACE AFTER THE FTE REVIEW

n) Add the total amount of documented time from 8j and 8k by SSID and document it in a spreadsheet.	YES	NO
---	-----	----

⁷ If less than 50 records are being sampled, total up for all records. For example, if 25 records are being reviewed, then total up this time for all records.

o) Calculate FTEs for the sampled SSIDs from 8n. Was this completed?	YES	NO
p) Did the school send the TLOR per 8m? If yes, calculate FTEs by SSID for all records based on the TLOR (see guidance on p.16-18, 21)	YES	NO
q) Compare the calculated FTEs from 8p against the FTEs reported in the most recent FTE Detail Report. Do the FTEs match? If no, document the difference.		
r) By SSID, compare the FTEs calculated from the sample in 8o against the corresponding FTEs in 8p. Did they match? If no, document the difference.		

Additional Notes/Issues**Item 9: Homeless Situations**

Questions	Responses/Findings
Number of homeless situations put on hold pending the school contacting a district homeless liaison or or ODE's homeless liaison.	
Additional Notes/Issues	

Item 10: IEPs and Special Education Records

Questions	Responses/Findings
<p>For the 25% of randomly selected students with a disability status, check the validity of the data for funding purposes.</p> <p>An IEP is valid if:</p> <ul style="list-style-type: none"> a) The ETR lists the disability of the student and is signed. b) The IEP is in effect for the current school year. c) The IEP is signed or there is a log of 3 attempts to get the signature d) The disability designation (In EMIS) matches the disability of the ETR. 	<p>YES NO</p>
Indicate number of ETR's/IEP's checked during the review:	
Indicate number of IEP's valid for funding:	
Indicate number of IEP's with errors in EMIS, if the information is available:	
Indicate number of IEP's put on hold pending the school contacting ODE's Office of Exceptional Children:	

Additional Notes/Issues

Item 11: Assessing if larger Sample Size is required

Questions	Responses/Findings
Analyze the results of the review conducted and determine if additional students should be selected for review.	
If there is a pattern of errors or lack of documentation, then selections may be stratified to restrict the selection to that specific item type (i.e., if the errors all relate to special education funding, then selections can be limited to special education students).	
Is there a pattern of errors? If yes, what were the error(s)?	YES NO
Additional students should be selected when the amount of errors noted in the initial group selected for review equals or exceeds 8 percent for any single attribute tested in Item 8 a-d, 8 e-g, 8 n-p and Item 10.8	YES NO

⁸ This process should continue until the tolerable error does not exceed 8% of all the students reviewed up to this point or the entire school has been reviewed.

<p>The number of additional students selected should be equal to the number of students selected in Item 5, based on the school enrollment.</p> <p>Were additional students selected for review?</p>	
<p>Additional Notes/Issues</p>	

Item 12: Exit Conference

Questions	Responses/Findings	
<p>Conduct an exit conference with the community school to discuss the results of the review.</p> <p>Was this done?</p>	YES	NO
<p>With whom was the exit conference conducted?</p>		
<p>Additional Notes/Issues</p>		

Item 13: Post FTE Review Actions (To be completed after the on-site FTE Review)

Questions	Responses/Findings	
Record on the FTE Review Report Form the results of the review from Items 7, 8, 9, and 10 along with the review of policies and calendars from Items 3 and 4. Was this done?	YES	NO
Number of errors identified:		
Number of issues noted:		
Were there any recommendations noted on the FTE Review Report Form?	YES	NO
Was a letter prepared to communicate the results of the FTE review to the community school with copies of the letter to the sponsor, CS Payment Administrator, and AOS?	YES	NO
Were there any issues which needed to be forwarded to other ODE offices (i.e., issues with IEPs, blended learning, etc.?) If yes, what offices were contacted?	YES	NO
Indicate where copies of the FTE Review documentation, notes, reports, are filed (see p. 25 for requirements):		
Send copies of the FTE Review letter, FTE Review Report Form, and the Checklist to the CS Payment Administrator. Was this completed and when?	YES	NO

Additional Notes/Issues

FTE Review Report Form

School Year:	
Date of Review:	
Community School:	
Contact:	
Sponsor:	
School Type:	<input type="checkbox"/> Brick-and-Mortar <input type="checkbox"/> eSchool <input type="checkbox"/> Blended Learning School
Community School Attendees:	
Name of Reviewer(s):	

List of Errors

Errors	Error Explanations	Expected Corrections

Review of Enrollment and Attendance Policies

Review of Contract

Review of School Calendar

Issues/Recommendations

EXAMPLE FTE REVIEW LETTER

June 2, 2017

Administrator
School Name (IRN)
Address
City, State Zip Code

Dear Principal_____,

A Full-Equivalent (FTE) review of _____ **(Insert name of school)** was completed by a representative of the Ohio Department of Education on Monday May 14, 2017.

_____ **(Insert area coordinator names)** conducted the FTE review for Fiscal Year 2017.

_____ is a _____ **(Insert brick-and-mortar, eSchool, or blended learning school)**.

Students have two choices on how to earn their education. They can “attend class” by logging into live classes. They can also do independent studies which include logging into recorded classes, downloadable power point activities, independent study, all of which require an test of what they have learned at the end of the week.

_____ is being funded for 890 FTEs on their May SFPR, 71 students were selected to be reviewed. All 71 students had birth certificates and proof of residences. They also had documentation of receiving a computer and their initial log in.

Issues Reported to ODE

The following issues were documented and will be reported to ODE:

- DF8577187 not recorded in ODDEX as a withdrawal
- DL5134432 no withdrawal form in student file folder
- The school’s software used to track attendance and class participation does not show accumulated time by day, week, month, or year. This makes it impossible to determine how many total hours of participation actually occur.

Please note that ODE may be required to take additional action based on these issues or findings. For example, ODE may request additional information and/or documentation of learning opportunities. ODE officials will contact the school if any action is necessary.

Recommendations

The reviewer made the following recommendations:

- Policies need to be reviewed, need for clarification and ramifications of offenses

- Check all withdraw students to be sure all withdrawal dates are documented in each student file

I would like to express my appreciation to you and your staff for the cooperation as well as the organization of the materials and data involved in the preparation for this review. If you have additional concerns or questions, please do not hesitate to contact this office.

Sincerely,

Area Coordinators

Area Coordinators, Area #

cc: Sponsor

Chris Babal, Office of Budget and School Funding

Frank Stoy, Office of Quality School Choice

Any other Offices/Directors as necessary i.e. Special Education

Auditor of State