



Dave Yost • Auditor of State

Ohio Auditor of State

# Second Report on Community School Student Attendance Counts

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# Dave Yost • Auditor of State

To the Ohio Board of Education, Interim Superintendent Rivera, Office of Community Schools, Sponsors, and the General Assembly:

As a follow-up to our previous report on community school attendance dated January 22, 2015, the Auditor of State (AOS) conducted a second unannounced, or “surprise”, student head count among a sampling of Ohio’s site-based community schools and a few traditional schools on Monday, November 9, 2015, under the authority of Ohio Revised Code Section 117.11.

This report is being provided to the sponsors of the selected community schools and the Ohio Department of Education (ODE). AOS also shared the results of this report with the administrators, principals, treasurers, and management companies of the selected community schools. This report includes a summary of the head count results, explanation of our analysis, and corrective action recommendations for consideration by the sponsors and ODE. The sponsors and ODE are encouraged to use the results of this review as a resource in improving their community school guidance and monitoring processes. Our report also includes legislative recommendations for consideration by the members of the general assembly.

This engagement is not a financial or performance audit, the objectives of which would be vastly different. Therefore, it is not within the scope of this work to conduct a comprehensive and detailed examination of enrollment or Ohio’s Foundation funding of community schools. Additionally, certain information included in this report was derived from sponsors, ODE, and community school management. Approximately 60 AOS auditors and/or investigators conducted student attendance counts.

Additional copies of this report can be requested by calling the Clerk of the Bureau’s office at (614) 466-2310 or toll free at (800) 282-0370. In addition, this report can be accessed online through the AOS website at <http://www.ohioauditor.gov> by choosing the “Audit Search” option.

Sincerely,

A handwritten signature in black ink that reads "Dave Yost".

**Dave Yost**  
Auditor of State

May 23, 2016

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## Executive Summary

AOS completed a second unannounced student head count among a sampling of 44 Ohio site-based community schools on Monday, November 9, 2015, to verify the accuracy of the enrollment and attendance data reported by community schools to the Ohio Department of Education (ODE). On the same day, AOS also completed an unannounced student head count among ten traditional school buildings located in public school districts in proximity to our selected community schools to serve as a control group for the community school head count results. The purpose of the control group was to compare student head count results in our community school sample to the student head count results in traditional school buildings that have a similar demographic composition of students. The sample of traditional schools included elementary, middle and high schools, as our sample of community schools selected serve students ranging from grades K-12. Our theory was that student attendance at community schools would be analogous to student attendance at traditional schools that serve the same demographic area of students.

Upon arriving at each of the community and traditional schools, AOS auditors readily obtained permission from school superintendents, directors and/or principals to perform a head count of students in attendance that day, escorted by school management. To protect the personal identification and confidentiality of students, AOS did not request student names or Statewide Student Identifier (SSID) numbers. Instead, AOS strictly counted individual students in attendance in each classroom and other locations throughout each school.

Additionally, AOS either requested or subsequently returned the following day to obtain the absence and tardy listings for their students for each of the selected community schools for the day of the head count. We were not always able to request this information on the day of the actual student head count since it was still incomplete for most schools. Additionally, to ensure the validity and integrity of these lists, we did not inform the schools that we would be returning the day after the count to obtain this information. All schools complied with our requests and provided absence and tardy lists to our teams on the second day.

AOS examined the head count results and compared to FTE estimates reported by the community schools to ODE. AOS also examined the documentation obtained supporting absences, tardiness, or blended learning opportunities which might explain variances between the head count and enrollment information the community school reported to ODE. An explanation of the detailed Head Count Results can be found starting on page 15.

Except for Dropout Recovery and Prevention (DORP) community schools, the results of the November 9, 2015, student head count improved as compared to the prior year AOS student head count conducted on October 1, 2014, as described in the *Community School Student Attendance Report* dated January 22, 2015. It is not surprising that AOS identified a distinct difference between the attendance rates for DORP community schools and all other site-based community schools this year. DORP schools did have the lowest attendance rates among the community schools examined; however, we anticipated the DORP attendance rates would be lower based upon the results of our prior year community school student attendance counts. Additionally, among the sample of 44 site-based community schools counted, we identified two DORP community schools and one start-up community school where we identified concerns. As described more fully in the Head Count Results section beginning on page 15, we are referring these three community schools to their sponsors and ODE for further investigation. We provided these schools an opportunity to respond to this report. The schools' responses were evaluated and changes were made to this report as AOS deemed necessary.

The attendance rates for the other site-based community schools counted this year appear to be slightly lower than the attendance rates of traditional public schools in similar geographic locations but all were supported by attendance, absence, and tardy documentation provided to AOS.

Ohio's school funding is largely based on enrollment as supported, in part, by student counts and attendance, as opposed to estimates of the amount of learning that takes place. According to a report Report on Community School Student Attendance Counts

prepared for the AOS by the John Glenn College of Public Affairs, the Ohio State University (OSU), research indicates that attendance has a significant causal impact on student learning. Thus, there is convincing evidence that attendance is a strong predictor of educational delivery. On the other hand, attendance is merely an input over which schools have minimal control. Additionally, although attendance has an impact on student achievement, it clearly is not required for educational delivery. Though some research suggests that online learning maybe less effective for some students, learning can and does happen remotely, whether as a primary platform or as a component in a blended learning environment. This could be an especially appealing option for students who are unable or unwilling to attend school, for example. In those cases, distance education allows for at least some learning when none would be possible otherwise. In those cases, estimates of learning are far better proxies for educational delivery—particularly when student participation in instructional activities is difficult to track.

The OSU brief reviews research on the validity of school and district performance metrics; the link between these performance metrics and student and societal outcomes; some of the pros and cons of basing district funding decisions on district performance metrics; and, finally, the link between student attendance and student achievement and attainment. The brief does not aim to be exhaustive. Instead, it focuses on reputable empirical research that speaks to the potential value of linking district funding to district-level measures of educational delivery. In short, the brief demonstrates that although attendance has been shown to have a significant causal impact on educational delivery, annual “value added” estimates of student learning are likely the best means of monitoring school district educational delivery of state-mandated academic content.

Appendix F of this report includes additional references supporting this research and OSU’s conclusions.

The results of the AOS community school student attendance counts performed the past two years illustrate how attendance among community schools can vary vastly depending upon the community school’s educational delivery model and other factors. Taken together with the research OSU examined in its brief, we respectfully suggest it is time for the General Assembly and other education stakeholders review the State’s school funding system. Compelling studies suggest that performance-based funding, or a binary system with alternative funding options for different situations, may be a more valid method for funding schools than funding schools based upon attendance alone.

## Background

There are a number of requirements for site-based community schools that must be understood in order to fully comprehend the results of our student head count.

First, all community schools must offer a minimum of 920 hours of learning opportunities (i.e., instructional hours) each school year. Attendance at a community school is defined by Ohio Rev. Code §3314.03 as participation in learning opportunities provided by a community school in accordance with the community school's educational plan approved by the sponsor in its contract.

Instructional hours in a community school are defined by learning opportunities provided to a student. Pursuant to Ohio Rev. Code §3314.03(A)(23) and Ohio Admin. Code (OAC) §3301-102-02, learning opportunities mean classroom-based or non-classroom-based supervised instructional and educational activities that are defined in the community school's sponsor 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. Instructional hours in a community school's day include recess and time for changing classes, but not the lunch period.

For students who have withdrawn, the community school must enter the pro-rated hours of enrollment up to the point of withdrawal. The total numbers of hours are those prorated hours the student was actually enrolled.

Ohio Rev. Code §3317.034(C) requires a community school student's enrollment shall be considered to cease on the date on which any of the following occur:

- (1) The district [community school] receives documentation from a parent terminating enrollment of the student.
- (2) The district [community school] is provided documentation of a student's enrollment in another public or nonpublic school.
- (3) The student ceases to participate in learning opportunities provided by the school.

In addition, Ohio Rev. Code §3314.03(A)(6)(b) requires community schools to develop procedures for withdrawing a student from the school if the student fails to participate in one hundred five consecutive hours of learning opportunities without a legitimate excuse.

Second, site-based community schools are permitted to have blended learning opportunities under the authority of Ohio Rev. Code §3302.41 and §3301.079 (K)(1), subject to approval by their sponsor. As defined in Ohio Rev. Code §3301.079 (K)(1), "blended learning" is the delivery of instruction in a combination of time in a supervised, physical location away from home and online delivery where the student has some element of control over time, place, path, or pace of learning. The combination of on-site and online instruction for community schools offering blended learning opportunities increases the risk of noncompliance with enrollment documentation requirements. To comply with the statutes and rules, community schools offering blended learning opportunities must carefully document both the physical attendance of students as well as their participation in online learning opportunities.

Authorized by the State Board of Education under the *Alternative Pathways* for high school students legislation, site-based community schools are also permitted to offer credit flexibility. Credit flexibility permits students to meet core coursework requirements in four ways: traditional classroom, integrated learning, applied learning or career-technical learning. Through credit flexibility, students can earn credit through classroom instruction, demonstration of subject area competency, or a combination of both. ODE is statutorily required to develop guidelines for credit flexibility. As part of their guidelines, ODE requires every school have a policy on credit flexibility. Schools are also required to develop individual student learning plans, in consultation with the student, parents, and/or guardians, that describe the student's

goals and how the student will know he or she has succeeded. Schools can measure student achievement by administering a test, a project, or a combination of several measures. Pursuant to Ohio Rev. Code §3301.0714, schools must also enter data concerning the enrollment and attendance of their students into ODE's Education Management Information System (EMIS). EMIS is used by schools to enter and review student enrollment and demographic data to form the basis for the flow of funds to community schools and STEM schools.

As part of its monitoring efforts, ODE area coordinators conduct FTE reviews among a sampling of community schools each year to verify the accuracy of community schools' enrollment and attendance data in EMIS. An ODE FTE review team examines enrollment and attendance policies, student enrollment data and the school's procedures for maintaining enrollment and attendance documentation that substantiates whether the FTE reported in EMIS is accurate. The ODE review team compares the source enrollment and attendance data with the EMIS data submitted by the community school for funding and checks for the validity of the individualized educational plans being implemented in the school. The FTE team also reviews the schools' procedures for monitoring and resolving students flagged by other schools for State Foundation funding purposes. Schools can review each other's student data and place flags on a student when there is a question about the accuracy of a student's demographic or enrollment data. Once a school flags a student, ODE temporarily suspends State Foundation funding for that student until the affected schools mutually resolve any discrepancy(ies).

Finally, ODE converts the number of community school students to full-time equivalents (FTE) based on the school's calendar, dates of enrollment, student's percentage of time attended, and other variables contained within EMIS. FTE represents that portion of the school year a student was educated, as determined by the number of hours of instruction offered to a student enrolled during a school year divided by its total hours of instruction (which a community school must provide during a school year in accordance with its sponsor contract). A student who enters at the beginning of a school year and remains enrolled for the full school year will generate an FTE of 1.0. Students who do not remain enrolled for the entire school year or who enter after the start of a school year will have FTE's less than 1.0, reflecting the portion of the school year they were enrolled. Additionally, students that are participating in learning opportunities on a part-time basis, should have their FTE calculated based on the number of instructional hours the student is enrolled and attending the school, adjusted by the student's percent of time, divided by the number of hours in the school year. This calculation would also result in FTE less than 1.0. For blended learning students, the community school should estimate the student's percent of participation time upon enrollment. The community school should document and follow a procedure to update the student's percent of time element in EMIS periodically based on documented actual hours in comparison with hours estimated to complete the school year in order to be on track for full-time status. ODE does not provide additional funding for a community school student with a FTE of greater than 1.0.

## Head Count Limitations

### Head Count Limitations

A glossary of definitions is provided in Appendix E to assist the reader in understanding terminology used throughout this report. Due to the nature of a surprise<sup>1</sup> head count, AOS recognizes there are limitations on the use of the data in this report. Limitations are the shortcomings, conditions or influences that cannot be controlled by AOS that place restrictions on the methodology and conclusions. The following are limitations that might influence AOS results:

- **Site-Based Community Schools versus E-Schools** - Site-based community schools are community schools where at least some of their instruction is provided in a brick-and-mortar facility. 34 CFR 222.176 defines a brick-and-mortar school facility as a building used to provide free public education, including instructional, resource, food service, and general or administrative support areas, so long as they are part of the facility. Site-based schools are also permitted to have blended learning opportunities under the authority of Ohio Rev. Code §3302.41 and §3301.079 (K)(1) and credit flexibility under the State Board of Education's *Alternative Pathways*, subject to approval by their sponsor. An E-School is an online public school or an internet or computer-based community school pursuant to Ohio Rev. Code §3314.02 in which the enrolled students work primarily from their residences on assignments in non-classroom-based learning opportunities via an internet- or other computer-based instructional method that does not rely on regular classroom instruction. An E-school also includes comprehensive instructional methods that include internet-based, other computer-based, and non-computer-based learning opportunities. Online community school and E-School have the same meaning as internet- or computer-based community school. When enrolled in an E-School, the student receives a computer and online access to the school. While AOS uses other procedures to analyze enrollment for E-schools as part of their annual financial statement audits, AOS chose to select only site-based community schools for its AOS head count since it is logistically more practical to physically observe students attending on a surprise basis.
- **Sample size** – AOS haphazardly<sup>2</sup> selected 38, roughly eleven percent, out of 349 site-based community schools for testing. As discussed above, AOS selected only site-based community schools, without regard to location, academic performance, news media allegations, or type of sponsors. AOS also included the seven Category 1 community schools identified during the previous AOS Head Count on October 1, 2014; however, one of these community schools could not be counted due to suspending operations on September 4, 2015. AOS selected these 44 community schools based on a number of factors. Most importantly, AOS wanted to follow up on the Category 1 community schools from last year to determine whether they had improved. AOS also wanted to ensure it had sufficient staff and resources to perform the head counts for each community school simultaneously on the same day with minimal disruption to the community schools' students, faculty, and administration. In addition, as described more fully in the Executive Summary, AOS haphazardly selected ten traditional school buildings serving similarly-situated students in relation to our community school sample this year to serve as a control group.<sup>3</sup> The sample of traditional schools included elementary, middle and high schools, as our sample of community schools selected serve students ranging from grades K-12.

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<sup>1</sup> "Surprise" is a term of art used in the auditing profession to describe an event that is planned by the auditor but unannounced to the auditee. The element of surprise adds more validity to the results derived from the auditor's procedures.

<sup>2</sup> "Haphazard" is a term of art used in the auditing profession to indicate the auditor selected the sample items without intentional bias to include or exclude certain items in the population. Haphazard selection is permitted for nonstatistical samples when the auditor believes it produces a fairly representative sample.

<sup>3</sup> A "control group" is a group separated from the rest of the experiment where the independent variable being tested cannot influence the results. This isolates the independent variable's effects on the experiment and can help rule out alternate explanations of the experimental results.

- **Unannounced Head Count** – AOS intentionally did not provide notice to the community schools or their sponsors about the head count. AOS determined performing the community school student head count in this manner ensured the highest degree of integrity and validity in the results. However, in order to ensure the head count remained unexpected, AOS decided not to contact sponsors or ODE for information that might have been useful in planning the head count and assessing the initial results.
- **FTE versus Head Counts** – For each community school, ODE converts the number of community school students to full-time equivalents (FTE's) based on the school's calendar(s), dates of enrollment, student's percentage of time attended and other variables within EMIS. FTE represents that portion of the school year a student was educated, as determined by the number of hours of instruction offered to a student enrolled during a school year divided by its total hours of instruction. The sponsor contract dictates the total hours of instruction a community school must provide during a school year. A student who enters at the beginning of a school year and remains enrolled for the full school year will generate an FTE of 1.0. Students who do not remain enrolled for the entire school year or who enter after the start of a school year will have FTE's less than 1.0, reflecting the percentage of time attended. Additionally, students that are participating in learning opportunities on a part-time basis will have FTE's less than 1.0. As a result, the number of community school students does not squarely equate to the number of FTE's reported by a community school since some students will have FTE's less than 1.0.

In addition, during the 2014-2015 and 2015-2016 school years, ODE experienced certain programming errors and/or malfunctions in EMIS' calculation of FTE's during its transition into the new EMIS redesign that further complicated a school, auditor, or other user's ability to assess the accuracy of FTE's a school reports.

- **Attendance versus Enrollment** – Community schools are funded based on annualized enrollment, not attendance. However, there is an important nexus between student attendance and enrollment for Foundation funding purposes. Students are considered as enrolled in a community school until the last day of attendance due to permissible student withdrawal or closure of the community school. Pursuant to the statutes and rules outlined in ODE's EMIS and other manuals, schools must provide documentation that clearly demonstrates students have participated in learning opportunities, either through attendance or evidence that a student has logged into an online learning system. Students with excused absences remain enrolled and will be funded. Community school students with unexcused absences, however, must be withdrawn upon reaching 105 consecutive hours of non-attendance.
- **Lack of Community School Attendance Policies Collected** - Due to the surprise nature of the count and a desire to minimize the disruption to community schools' students, faculty, and management, AOS did not request copies of community school attendance policies from management during the course of the AOS head count. However, where it was determined to be necessary to understand unexpected variances in the comparison of head count results to ODE-reported enrollment information, AOS did subsequently contact certain community school administrators and principals for additional information.
- **Protected Student Information** – While AOS has statutory authority to review protected personally identifiable student information during the course of an audit, AOS chose not to request student names from community schools during the course of its head count out of an abundance of caution to protect this information. AOS recognized that student names or Statewide Student Identifier (SSID) numbers would be necessary to investigate irregularities further; however, the purpose of the AOS head count was to determine whether the existing system reliably represents attendance and enrollment across the community school platform.
- **Availability and Accuracy of School Calendars** – When planning the timing of the surprise head count, AOS reviewed the school calendars available on selected community schools'

websites, where applicable, to ensure classes would be in session on November 9, 2015, and schools were not conducting assessment testing. However, during this process and upon interviewing community school administrators and principals, AOS noted many community schools did not make their school calendars publicly available on their website and/or the calendars were not up to date.

- **Non-validated Data From External Sources** – To complete this report, auditors gathered and assessed data from the selected community schools and conducted interviews with community school administrators, principals, treasurers, management companies, ODE, and sponsors. Data from external sources was not examined for reliability.
- **Ohio Educational Directory System** – The Ohio Educational Directory System (OEDS) is a decentralized data system in which organizations (those who do business with ODE, such as public school districts, joint vocational schools, community schools, educational service centers, nonpublic schools, etc.) maintain their own data. The general public can search OEDS for the information maintained about these organizations. However, during the head count, AOS noted many community schools had not updated their school's current year estimated student enrollment, other annex school locations, and estimated teacher count in OEDS. ODE confirmed to AOS that schools are no longer statutorily required to maintain accurate information in OEDS. Rather, schools can opt not to use or update their OEDS information at their own discretion. As the only centralized, publicly-available source for this information; however, AOS used the OEDS information during the planning stage of the student head count for both community and traditional schools.
- **ODE Community School Contract Database** – Each community school enters into a community school contract with its sponsor. During the planning stage of the surprise head count, AOS also examined the community school contract of each community school included in the head count to determine each school's organizational structure, educational plan, type of learning model, and teacher to student ratio. However, AOS noted some community school contracts were not maintained in ODE's database or some were not up-to-date for the current period. ODE informed AOS that these contracts are required to be updated and maintained in ODE's database on a timely basis.
- **Student Head Count Is Not An Audit** – This engagement is not a financial or performance audit, the objectives of which would be vastly different. Therefore, it is not within the scope of this work to conduct a comprehensive and detailed examination of a community school's enrollment or the FTE's upon which ODE bases State Foundation funding. Rather, this student count is intended to identify potential corrective action items for sponsors and recommendations for the General Assembly and ODE to improve community school laws, regulations and guidance and decrease vulnerabilities in the community school funding and accountability systems.

<b>Schools Selected for Head Count</b>
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AOS haphazardly selected the following community schools for the November 9, 2015, head count:

	<b>IRN</b>	<b>School Name</b>	<b>County</b>	<b>Sponsor</b>	<b>School Type<sup>4</sup></b>
1.	013198	Brookwood Academy	Franklin	Reynoldsburg City School District	Start-up
2.	009163	C.M. Grant Leadership Academy	Franklin	St. Aloysius Orphanage	Start-up
3.	013255	Canton College Preparatory School	Stark	Ohio Council of Community Schools	Start-up
4.	000557	Columbus Arts & Technology Academy	Franklin	Ohio Council of Community Schools	Start-up
5.	133264	Dohn Community	Hamilton	Kids Count of Dayton, Inc.	DORP
6.	012031	Entrepreneurship Preparatory School - Woodland Hills Campus	Cuyahoga	Cleveland Municipal School District	Start-up
7.	000131	Glass City Academy	Lucas	Education Services Center of Lake Erie West	DORP
8.	014091	Hope Learning Academy	Lucas	North Central Ohio Educational Service Center	Conversion
9.	011976	Horizon Science Academy Dayton Downtown	Montgomery	Buckeye Community Hope Foundation	Start-up
10.	014139	Imagine Columbus Primary School	Franklin	North Central Ohio Educational Services Center	Conversion
11.	009957	Klepinger Community School	Montgomery	St. Aloysius Orphanage	Start-up
12.	151027	London Academy	Madison	London City School District	DORP
13.	000318	Menlo Park Academy	Cuyahoga	Education Services Center of Lake Erie West	Start-up
14.	134213	Middlebury Academy	Summit	St. Aloysius Orphanage	Start-up
15.	000780	Midnimo Cross Cultural Community School	Franklin	North Central Ohio Educational Service Center	Conversion
16.	143123	Mound Street Military Careers Academy	Montgomery	Montgomery County Educational Services Center	DORP
17.	000953	Mt. Healthy Preparatory and Fitness Academy	Hamilton	Ohio Council of Community Schools	Start-up
18.	008280	Noble Academy-Columbus	Franklin	Buckeye Community Hope Foundation	Start-up

<sup>4</sup> Dropout Recovery and Prevention (DORP) schools are noted with the acronym "DORP"; Start-up schools are established in contract between a sponsoring/authorizing entity and approved by ODE and the governing body of the community school; Conversion schools are created by converting all or a portion of a traditional public school, including joint vocational school or building operated by an educational service center (ESC) to a community school.

	<b>IRN</b>	<b>School Name</b>	<b>County</b>	<b>Sponsor</b>	<b>School Type</b>
19.	012054	North Central Academy	Seneca	North Central Ohio Educational Service Center	Conversion
20.	143529	North Dayton School Of Science & Discovery	Montgomery	Education Services Center of Lake Erie West	Start-up
21.	133736	Richard Allen Academy I	Montgomery	Office of School Sponsorship	Start-up
22.	143560	Richard Allen Academy II	Montgomery	Office of School Sponsorship	Start-up
23.	133348	Richard Allen Preparatory	Montgomery	Office of School Sponsorship	Start-up
24.	133488	River Gate High School	Trumbull	St. Aloysius Orphanage	DORP
25.	000510	Springfield Preparatory and Fitness Academy	Clark	Ohio Council of Community Schools	Start-up
26.	012644	STEAM Academy of Warren	Trumbull	Office of School Sponsorship	Start-up
27.	132779	Summit Academy Akron Middle School	Summit	Education Services Center of Lake Erie West	Start-up
28.	000298	Summit Academy Secondary – Akron	Summit	Education Services Center of Lake Erie West	Start-up
29.	000634	Summit Academy Secondary School - Middletown	Butler	Education Services Center of Lake Erie West	Start-up
30.	000608	Summit Academy Transition High School-Cincinnati	Hamilton	Education Services Center of Lake Erie West	Start-up
31.	133868	Towpath Trail High School	Summit	St. Aloysius Orphanage	DORP
32.	014063	University Academy	Summit	Buckeye Community Hope Foundation	Start-up
33.	012541	University of Cleveland Preparatory School	Cuyahoga	Ohio Council of Community Schools	Start-up
34.	149062	Urbana Community School	Champaign	Urbana City School District	DORP
35.	014830	Utica Shale Academy of Ohio	Columbiana	Jefferson County Educational Services Center	Conversion
36.	011291	Village Preparatory School	Cuyahoga	Cleveland Municipal School District	Start-up
37.	013059	West Carrollton Secondary Academy	Montgomery	West Carrollton City School District	DORP
38.	000875	Westside Academy	Franklin	Buckeye Community Hope Foundation	Start-up

AOS also included the following category 1 community schools visited during the previous AOS head count on October 1, 2014, as part of the November 9, 2015, head count:

	<b>IRN</b>	<b>School Name</b>	<b>County</b>	<b>Sponsor</b>	<b>School Type</b>
1.	013249	Academy of Urban Scholars Youngstown	Mahoning	Buckeye Community Hope Foundation	DORP
2.	012044	Capital High School	Franklin	Educational Resource Consultants of Ohio	DORP
3.	008283	Dayton Technology Design High School	Montgomery	Dayton City School District	DORP
4.	133835	Invictus High School	Cuyahoga	St Aloysius Orphanage	DORP
5.	143164	Life Skills Center Of Hamilton County <sup>5</sup>	Hamilton	Ohio Council of Community Schools	DORP
6.	133785	Life Skills Center Of Cincinnati	Hamilton	St Aloysius Orphanage	DORP
7.	133801	Life Skills Center Of Youngstown	Mahoning	St Aloysius Orphanage	DORP

AOS haphazardly selected the following traditional schools for the November 9, 2015, head count as a control group of schools serving students around the sample community schools selected for the head count:

	<b>IRN</b>	<b>School Name</b>	<b>County</b>	<b>Type of School</b>
1.	000497	Alpine Elementary School	Franklin	Elementary School
2.	118414	Cuyahoga Heights Middle School	Cuyahoga	Middle School
3.	031427	Hannah Ashton Middle School	Franklin	Middle School
4.	018507	Jonathan Alder High School	Madison	High School
5.	023259	Max S. Hayes High School	Cuyahoga	High School
6.	027268	Noble (4-5)	Seneca	Elementary School
7.	009511	Phoenix Middle School	Franklin	Alternative Middle School
8.	036152	Stivers School for the Arts	Montgomery	High School
9.	038950	Waite High School	Lucas	High School
10.	081802	Woodland Elementary School	Wood	Elementary School

<sup>5</sup>Community School was identified as a category 1 school as a result of the October 1, 2014, Head Count; however, the school was suspended from operation by their sponsor on 9/5/15. Therefore, we did not perform a Head Count on 11/9/15.

## Head Count Results

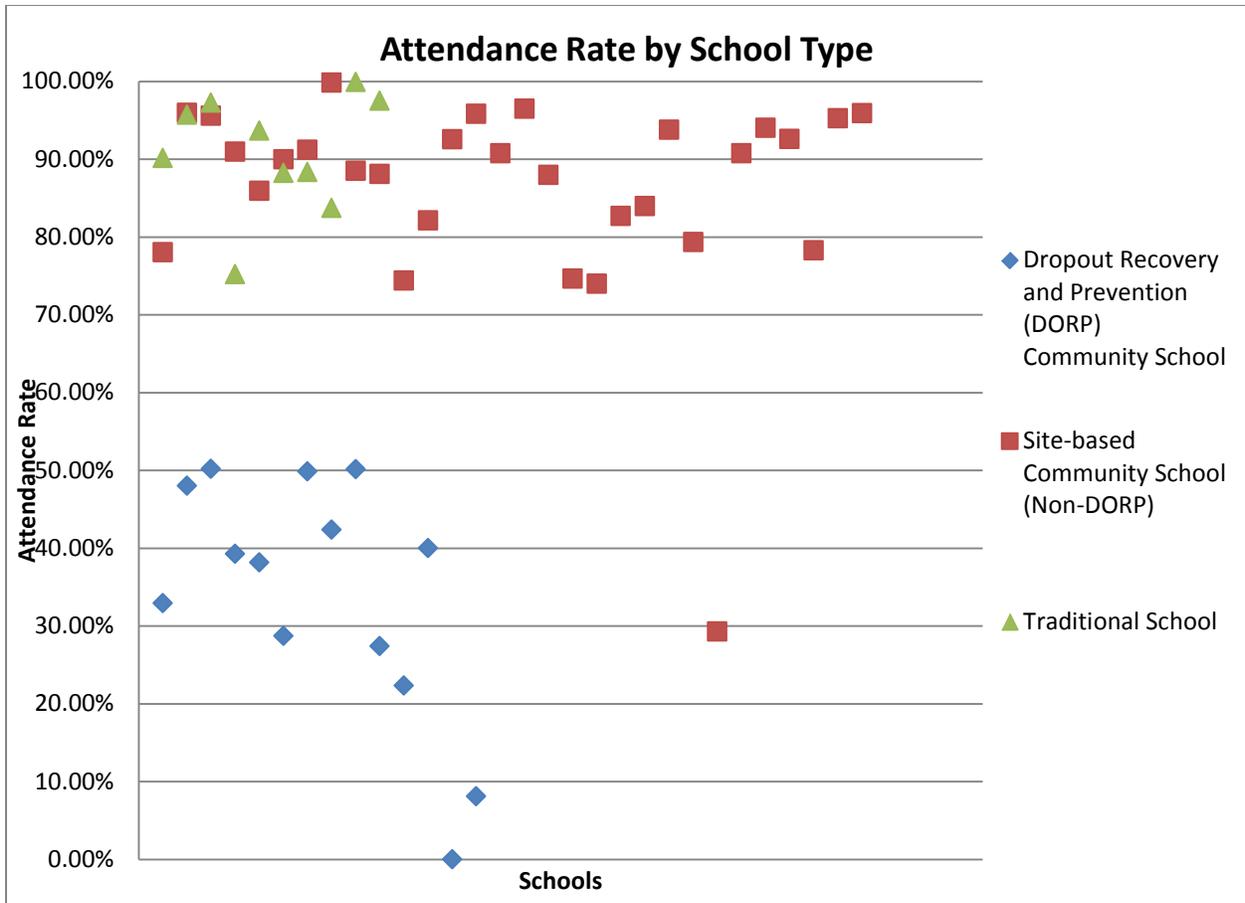
First, AOS compared the results of the actual community school student head counts to the November 12, 2015, FTE estimate reported on the fiscal year 2016 Detail Funding Report for Community School/Stem School for each community school. This report details the estimated enrollment on a FTE basis and the community school's Foundation payment. AOS also compared the results of the actual traditional school student head counts to the November 9, 2015, FTE snapshot data received from ODE. The data identified the FTE amount each traditional school building reported to ODE in EMIS on the day of our head count, November 9, 2015.

As in our prior year AOS student head count conducted on October 1, 2014 (described in the *Community School Student Attendance Report* dated January 22, 2015), AOS noted a distinct difference between the attendance of the Dropout Recovery and Prevention (DORP) community schools and all other site-based community schools, including start-up and conversion community schools. In order to analyze the results of our community school student head counts more fairly in relation to their peers, AOS separated the community school sample into two subpopulations for this year's analysis: DORP community schools, and all other site-based community school types, including start-up and conversion community schools.

DORP schools provide life-changing education for those students who persevere. Because their student population is at the high end of the risk scale, current law provides several exceptions to and waivers for community schools serving primarily dropout recovery students. Similar to the previous year, AOS found the DORP schools continued to have the highest non-attendance during this year's community school student head count. There is no question that DORP schools face many challenges in maintaining student attendance. The following are several obstacles DORP schools management described to AOS during our interviews:

- DORP schools serves students that are in transition and each student has different motivators for attendance;
- Students have different levels of support from their families; younger students typically have more family support and attend more regularly than older students;
- Parental expectations play a key role in driving individual student attendance;
- Some students do not attend because they lose housing; several DORP schools work with community partners that assist these students in finding housing;
- Some students have children of their own and are balancing child care issues;
- DORP schools are in competition with local employers that schedule students to work during school hours; and
- Some students have difficulty finding reliable transportation.

AOS examined the head count results and identified the attendance rate by type of school examined. As expected, the DORP schools had the lowest attendance rates during the head count, ranging from 0% to 50.2% attendance. The start-up or conversion community schools' attendance rates ranged from 29.3% to 99.9%. Traditional school attendance in similar demographic areas was also analyzed and compared to the community school attendance results from our sample. The traditional school attendance rates ranged from 75.2% to 99.9% and were comparable to the attendance rates of the start-up and conversion community schools selected for our student head count. An analysis of each school attendance rate is as follows:



AOS then determined the standard deviation of the DORP community schools by using the percent variance between the actual head count and the November 12, 2015, FTE estimate reported on the fiscal year 2016 Detail Funding report. The standard deviation for the DORP community schools was identified as 15%. The standard deviation was then added to the average percent variance between the actual head counts and the November 12, 2015, FTE estimate (65.9%) in order to determine the DORP community schools for further examination. AOS identified the DORP community schools with a percent variance equal to or greater than 80.9% and subsequently returned to those community schools to interview management concerning the variances. The community schools provided additional information to AOS during this interview process to help explain their variances. For detailed head count results for the DORP's, see Appendix B.

AOS also calculated the standard deviation for the start-up or conversion community schools by using the percent variance between the actual head counts and the November 12, 2015, FTE estimate reported on the fiscal year 2016 Detail Funding report. The standard deviation for the start-up or conversion community schools was identified as 12.8%. The standard deviation was then added to the average percent variance between the actual head counts and the November 12, 2015, FTE estimate (13.7%) in order to determine the start-up or conversion community schools for further examination. AOS identified the start-up or conversion community school with a percent variance equal to or greater than 26.5% and subsequently contacted the community school to interview management concerning the variances. For detailed head count results for the start-up or conversion community schools, see Appendix C.

For all other community schools who fell below our standard deviation calculations, AOS sent a letter to the community school, their sponsor, management company and treasurer, and informed the community school about the result of our head count comparisons. AOS indicated no further documentation was

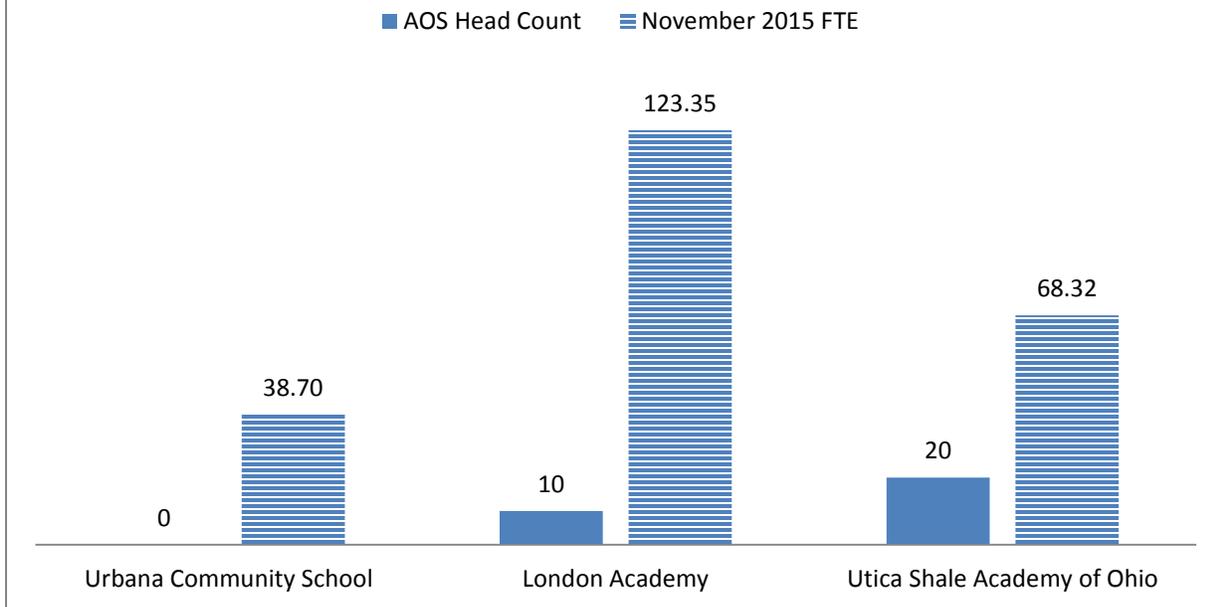
required; however, AOS provided each with the opportunity to respond or provide other relevant information, if desired.

The sample of traditional school student head count results were compared to the sampled community schools serving students in similar demographic areas. An analysis of the traditional school head count identified attendance rates that were slightly higher than the start-up or conversion community schools in those areas. The traditional schools' average difference between the AOS Head Count and the November 9, 2015, ODE FTE amount for the ten traditional schools was 56.24, with an average percentage of 9.0%. The average difference between the AOS Head Count and the November 2015 ODE FTE for the 30 start-up or conversion community schools was 26.65, with an average percentage of 13.7%. (For detailed head count results for traditional schools, see Appendix D.) AOS expected a closer correlation between the outcomes of these two groups. However, it is important to keep in mind that the basic correlations reported above do not capture causal relationships. For example, the dissimilarity could be attributable to differences in the student characteristics and school policy interventions between the two groups.

For each community school's November 2015 variance exceeding the standard deviation calculation (80.9% for DORP's and 26.5% for start-up or conversion community schools), AOS contacted the schools to interview management concerning the variances and obtain further documentation and an understanding of how each community school operates. As a result, we identified the following schools that had a variance exceeding one standard deviation – two DORP community schools and one start-up or conversion school:

	IRN	School Name	Sponsor	School Type	AOS Head Count	November 2015 FTE	November 2015 Variance	Standard Deviation	Average November 2015 Difference %	One Standard Deviation from Average November 2015 Difference %
1.	149062	Urbana Community School	Urbana City School District	DORP	0	38.70	<b>-100.00%</b>	15.0%	65.89%	<b>80.9%</b>
2.	151027	London Academy	London City School District	DORP	10	123.35	<b>-91.89%</b>	15.0%	65.89%	<b>80.9%</b>
3.	014830	Utica Shale Academy of Ohio	Jefferson County Educational Services Center	Conversion	20	68.32	<b>-70.73%</b>	12.8%	13.71%	<b>26.5%</b>

## Head Count Results AOS Head Count to November 2015 FTE



AOS interviewed each community school's management to obtain an explanation for the variance and any relevant supporting documentation. The detailed results of each community school's explanation and the AOS analyses are described in the following pages.

**URBANA COMMUNITY SCHOOL (IRN: 149062)  
CHAMPAIGN COUNTY**

SPONSOR: URBANA CITY SCHOOL DISTRICT  
 MANAGEMENT COMPANY: META SOLUTIONS  
 TREASURER: AMANDA HILDEBRAND  
 SCHOOL DIRECTOR: LARRY NICKLES  
 SUPERINTENDENT: CHARLES THIEL

PHYSICAL ADDRESS: 711 WOOD STREET  
 URBANA, OH 43078

TYPE OF LEARNING: TRADITIONAL CLASSROOM BASED MODEL  
 SCHOOL TYPE: DROPOUT RECOVERY AND PREVENTION

AOS HEAD COUNT	November 2015 FTE	Variance	Percent Variance	ODE Nov. 9 <sup>th</sup> Head Count	Variance	Percent Variance
0	38.70	(38.70)	(100.0%)	50	(50)	(100.0%)

During the head count on November 9, 2015, the School Director indicated the Urbana Community School, a site- based community school, operates as an online school. The community school provides computers to each student enrolled, and if the student is not able to obtain internet services, the community school provides the student with the internet equipment. The School Director also indicated students are allowed to take classes at the District high school if the course is not available at the community school.

AOS subsequently interviewed the community school Treasurer on January 21, 2016 and the Superintendent on January 28, 2016. The Treasurer indicated the community school maintains a lab space at the District high school for the community school students to use if necessary. The Treasurer indicated the community school offers tutoring for special education students on Individual Education Plans. These tutoring sessions occur in the student’s homes or at a local library. The Treasurer also indicated the community school maintains a blended learning environment.

Based on a review of the community school contract for the period, September 11, 2013 through June 30, 2017:

- The community school is established as a conversion community school;
- The educational plan describes the school as conventional classroom based coursework, internet based course work delivered in the residence of the students, the classroom of the school or other locations;
- Upon review of the ODE’s “Self-Identified Blended Learning Programs in Ohio” listing, the community school did not notify ODE regarding the School’s operation using a blended learning model, as is required; and
- Changes to the educational plan are subject to the sponsor approval; however, does not require revision of the sponsorship agreement.

Also, ODE has determined Urbana City Schools is unable to open new schools or accept sponsorship of existing schools as a consequence of the sponsor’s performance score and/or reporting non-compliance. Urbana City Schools failed to submit the 2014-2015 sponsor assurances for the Urbana Community School to ODE, as required prior to the beginning of school.

**URBANA COMMUNITY SCHOOL (IRN: 149062)  
CHAMPAIGN COUNTY  
(Continued)**

**AOS Conclusion:**

The Successor Community School Contract for the Urbana Community School entered into on September 11, 2013 with the Urbana City School Board of Education indicates Urbana Community School may operate as an internet or computer-based school. Yet, ODE indicated that Urbana Community School identified itself only as a site-based school and did not apply with ODE to be an internet-based school; and, further, has not declared itself to be utilizing a blended model of instruction. As described above, AOS determined that Urbana Community School provides a computer to each student enrolled and provides each student with internet equipment and access, if necessary. While Urbana Community School maintains a lab space at the Urbana City School District high school for community school students to use, if necessary, students receive virtually all instruction and coursework through non-classroom based, on-line resources.

Under Ohio Revised Code Section 3314.03(A), each community school contract must specify the education program of the school, the facilities to be used, including locations, and a description of the learning opportunities that will be offered to students including both classroom-based and non-classroom-based learning opportunities. The Urbana Community School contract educational plan describes the school as providing conventional classroom based coursework along with internet based coursework.

In addition, site-based community schools are community schools as to which at least some of their instruction is provided in a brick-and-mortar facility. Under 34 CFR 222.176 Subpart L, a school facility is defined as “a building used to provide free public education, including instructional, resource, food service, and general or administrative support areas...” Site-based schools are permitted to have blended learning opportunities under Ohio Revised Code Sections 3302.41 and 3301.079(K)(1). Blended learning includes a combination of the delivery of instruction in a supervised physical location away from home, and the delivery of instruction through an online delivery. However, Ohio Rev. Code Section 3302.41(A) requires the community school to provide a blended learning declaration to ODE if the school intends to employ a blended learning model. ODE informed us that Urbana Community School did not make a blended learning declaration for the 2015-2016 school year.

While Urbana Community School seems to be operating as an internet or computer-based school, ODE does not recognize the School as a computer-based school. Rather, ODE believes the School is a site-based community school despite the School’s many years of operating in this manner. As a result, we are referring these matters to Urbana City School District, the School’s sponsor, and ODE for further investigation.

**LONDON ACADEMY (IRN: 151027)  
MADISON COUNTY**

SPONSOR: LONDON CITY SCHOOL DISTRICT  
 MANAGEMENT COMPANY: NONE  
 TREASURER: JILL SMITH  
 SCHOOL DIRECTOR: PAULINE SWAN  
 SUPERINTENDENT: PAULINE SWAN

PHYSICAL ADDRESS: 40 S WALNUT ST  
 LONDON, OH 43140

TYPE OF LEARNING: CORRESPONDENCE BASED MODEL  
 SCHOOL TYPE: DROPOUT RECOVERY AND PREVENTION

AOS HEAD COUNT	November 2015 FTE	Variance	Percent Variance	ODE Nov. 9 <sup>th</sup> Head Count	Variance	Percent Variance
10	123.35	(113.35)	(91.89%)	270	(260.00)	(96.3%)

The Ohio Department of Education (ODE) notified the Academy in a letter sent via email on February 21, 2008, that it may be operating in conflict with state statutes. Specifically, ODE indicated that, “certain community schools are operating under the mistaken belief that they can have certain students receiving instruction in the manner of an e-school while at the same time other students receiving instruction in the manner of a site-based school. Such blended approaches are not allowed under Ohio law.” The letter went on to explain that site-based schools cannot contract with e-schools to provide a full-time e-school learning environment to students enrolled in the site-based school. Conversely, e-schools cannot contract with site-based schools or establish a site where students are expected to attend routinely as a portion of their required 920 hours.” At the conclusion of its letter, ODE indicated that they expected the sponsor and schools to take aggressive action to come into compliance with state law. Consequently, the sponsor, London CSD, changed the educational model of the Academy from an e-school to a site-based school.

Based on inquiry with the Academy and ODE, there was no evidence that ODE approved the Academy’s changes to its educational model for compliance. However, ODE conducted several FTE Reviews between 2008 and 2016 over the Academy’s enrollment. Until 2016, ODE did not express compliance concerns specific to the Academy’s contract or educational delivery model. ODE provided a letter to London Academy summarizing the results of its FTE Review of the Academy that took place on February 9, 2016. Within this letter, among other items, ODE notified the Academy that it should:

“Review your current contract to ensure it complies with new requirements in HB 2 [as codified in] ORC. 3314.03(A)(29) for blended learning programs and ORC 3314.19(N) which adds similar requirements. Moreover, the [U.S.D.E.’s Every Student Succeeds Act] ESSA adds a federal definition of blended learning as ‘a formal education program that leverages both technology-based and face-to-face instructional approaches A) that include an element of online or digital learning, combined with supervised learning time and student-led learning, in which the elements are connected to provide an integrated learning experience and B) in which students are provided some control over time, path, or pace.’ The school’s current education model may not comply with the changes to state and federal law. As a result, it is recommended the community school work diligently with its sponsor and legal counsel to ensure it faithfully implements these new requirements going forward in the FY 2017 school year.”

**LONDON ACADEMY (IRN: 151027)**  
**MADISON COUNTY**  
**(Continued)**

Given the Academy's designation as a site-based community school by ODE, AOS haphazardly selected the Academy in its sample of site-based community schools for the second head count. During the count on November 9, 2015, and a follow-up interview conducted on January 21, 2016, the Academy Superintendent indicated there were ten students in attendance at the Academy on the day of the head count. These students do not have enough credits to be a freshman in high school but have completed half the eighth grade required courses. Therefore, the Academy requires these students to participate in at least three hours of "seat time" each school day with an Academy teacher.

All other Academy students participate in the American School correspondence program, a paper-based curriculum. As part of the Academy's credit flexibility policy, enrolled students are given an Individual Learning Plan, identifying the students learning opportunities and requirements. The students receive packets of non-classroom based course work to complete at their individual pace. Students log the amount of time spent working and submit two completed exams each week in order to receive attendance credit.

The Superintendent also indicated the Academy sends teachers to alternative sites to tutor students. These sites include juvenile detention centers and libraries in the surrounding area of the Academy.

Based on a review of the Academy's community school contract for the period, July 1, 2013 through June 30, 2016:

- The educational program of the Academy outlines the ability of students to learn independently in their homes using an alternative education program;
- The community school contract speaks to the concept of blended learning to be operated in whole or in part at the Academy. However, upon interview with the School's management, the Academy is not purporting to use a blended learning model. Additionally, the Academy did not make a blended learning declaration to ODE regarding an intent to use blended learning during the 2015-2016 school year; and
- Changes to the educational program cannot be implemented without the prior written approval of the sponsor.

**AOS Conclusion:**

Site-based community schools are community schools as to which at least some of their instruction is provided in a brick-and-mortar facility. Under 34 CFR 222.176 Subpart L, a school facility is defined as "a building used to provide free public education, including instructional, resource, food service, and general or administrative support areas..." Site-based schools are permitted to have blended learning opportunities under Ohio Rev. Code Sections 3302.41 and 3301.079(K)(1). Blended learning includes a combination of the delivery of instruction in a supervised physical location away from home, and the delivery of instruction through an online delivery.

During our count and upon inquiry with London Academy's Director, AOS found that the Successor Community School Sponsorship Contract (the "Contract") entered into on July 1, 2013 between the London Academy and its sponsor, London City School District, in Article IV., Section (J)(2)(F), provides that London Academy will not provide learning opportunities that primarily consist of nonclassroom based activities or operate as an internet or computer based community school as defined by Ohio Rev. Code Section 3314.02(A)(7).

As part of our review, we also determined that London Academy operates as a correspondence school for one hundred percent of its students. All London Academy students work primarily from their residences on nonclassroom-based learning opportunities. Students are provided instruction in the form of hard-copy documents, and they work from their residences on assignments contained in the

**LONDON ACADEMY (IRN: 151027)**  
**MADISON COUNTY**  
**(Continued)**

documents. The Education Plan, which is attached as Exhibit 1 to the Contract, provides that “[t]he educational program of the school is premised on the ability of students to learn independently in their homes using an alternative educational program.” While London Academy does not provide its instruction via the internet or other computer based instructional methods, it relies solely upon a comprehensive instructional method that does not utilize regular classroom instruction. As such, it appears that London Academy is neither operating as a site-based community school nor as an internet computer-based school. London Academy represents in its educational plan that it offers “site-based instruction opportunities.” However, only students that do not have enough credit hours to meet the ninth-grade requirements are receiving site-based educational opportunities. While high-school age students have the option of attending the site-based facility for instruction, they are not required to do so, nor is there sufficient space within the facility to hold them all if they did. Further, London Academy does not purport to be using a blended learning model.

Under Chapter 3314 of the Ohio Rev. Code, a community school may operate as an internet or computer school, but only as permitted by 3314.013. Otherwise, a community school may operate in accordance with the methods permitted by Ohio Rev. Code Chapter 3314. Under Section 3314.03(A)(23), the community school contract must include, “a description of the learning opportunities that will be offered to students including both classroom-based and non-classroom-based learning opportunities that is in compliance with criteria for student participation established by the department under division (H)(2) of section 3314.08 of the Revised Code.” This section indicates that for non-internet schools, there must be learning opportunities that are “classroom-based.” As such, we do not believe there is clear authority in Ohio Rev. Code Chapter 3314 for a purely correspondence school educational program.

Further, ODE’s FTE Review and Community School Enrollment Handbook dated January 5, 2015 makes references to “non-classroom, non-computer learning activities” provided under the authority of Ohio Rev. Code Section 3314.08(H)(2) and instructs ODE’s FTE reviewers to “[d]etermine whether instruction is in a facility, nonclassroom correspondence courses, non-classroom blended learning, or eSchool.” These excerpts from the ODE FTE Review Handbook seem to suggest authority may exist for a site-based community school to offer only nonclassroom correspondence learning opportunities. However, AOS was unable to reconcile this guidance to the community school authority described in the aforementioned statutes.

As a result, we are referring these matters to ODE for further investigation. Additionally, ODE should seek input from and work cooperatively with the General Assembly to consider whether Ohio should grant clear statutory authority for community schools to employ a correspondence-based learning model. ODE should also clarify and better distinguish the requirements for blended learning and non-blended learning environments in its FTE Review and Community School Enrollment Handbook.

**UTICA SHALE ACADEMY OF OHIO (IRN: 014830)  
COLUMBIANA COUNTY**

SPONSOR: JEFFERSON COUNTY EDUCATIONAL SERVICES CENTER  
 MANAGEMENT COMPANY: NONE  
 TREASURER: DONALD DONAHUE  
 SCHOOL DIRECTOR: ERIC SAMPSON  
 SUPERINTENDENT: CHARLES KOKIKO

PHYSICAL ADDRESS: 38095 STATE ROUTE 39  
 SALINEVILLE, OH 43945

ALTERNATE LOCATION: 700 COLUMBIANA-WATERFORD ROAD  
 COLUMBIANA, OH 44408

TYPE OF LEARNING: BLENDED LEARNING MODEL  
 SCHOOL TYPE: CONVERSION COMMUNITY SCHOOL

AOS HEAD COUNT	November 2015 FTE	Variance	Percent Variance	ODE Nov. 9 <sup>th</sup> Head Count	Variance	Percent Variance
20	68.32	(48.32)	(70.73%)	70	(50.00)	(71.43%)
60 <sup>^</sup>	68.32	(8.32)	(12.18%)	70	(10.00)	(14.29%)
<b><sup>^</sup>Includes 22 students identified as being in attendance via their online VLA system. In addition, the Academy identified 18 students absent on the day of the head count.</b>						

During the head count on Monday, November 9, 2015, and follow-up telephone interviews on February 9 & 18, 2016, the Director indicated attendance is significantly lower on Monday's and Friday's due to the flexible schedule the Utica Shale Academy has established. The Utica Shale Academy is a conversion community school with a blended learning environment. The Utica Shale Academy has two daily classroom sessions students can attend, either 7:30-10:30 or 11:30-2:30. The Director indicated students are required to be in the classroom for a minimum of 15 hours per week. Classroom instruction includes working on their online curriculum, Virtual Learning Academy (VLA), guest speakers, class discussion on course topics, hands on activities, field trips and certification trainings. Tutors are available for questions and guidance while in the classroom; however, we did not observe any teachers on the day of the count. On days not in the classroom, students are required to log in and complete their school work through their VLA.

During the head count, the Utica Shale Academy identified an additional 22 students as being in attendance by logging in to the VLA system from their home. In addition, the Utica Shale Academy identified 18 students absent on the day of the head count.

Based on a review of the Utica Shale Academy's current community school contract, for the period, July 1, 2014, through June 30, 2019:

- The educational plan in Attachment II of the community school contract describes a blended learning opportunity for students through a robust online educational delivery system. Upon review of ODE's "Self-Identified Blended Learning Programs in Ohio" listing, the Utica Shale Academy did notify ODE regarding the Academy's operation using a blended learning model, as is required. However, the educational plan does not provide detail regarding how the online and classroom curriculum is used, the daily classroom session schedule, the minimum number of classroom hours required, and the number of online hours required;

**UTICA SHALE ACADEMY OF OHIO (IRN: 014830)  
COLUMBIANA COUNTY  
(Continued)**

- The community school contract did not identify the second alternative site for the community school. Upon further discussion with the Director, the second site had only recently been added; and
- Changes to the contract, including the educational plan, have to be made in writing and approved by both the Utica Shale Academy and Sponsor.

**AOS Conclusion:**

Site-based community schools are community schools as to which at least some of their instruction is provided in a brick-and-mortar facility. Under 34 CFR 222.176 Subpart L, a school facility is defined as “a building used to provide free public education, including instructional, resource, food service, and general or administrative support areas...” Site-based schools are permitted to have blended learning opportunities under Ohio Revised Code Sections 3302.41 and 3301.079(K)(1). Blended learning includes a combination of the delivery of instruction in a supervised physical location away from home, and the delivery of instruction through an online delivery.

AOS determined Utica Shale Academy to be a site-based school with a blended learning environment. The classroom instruction offered by the Utica Shale Academy consisted of opportunities for students to work on their online curriculum, Virtual Learning Academy, while at a school facility. The Utica Shale Academy indicated it also occasionally provides guest speakers, hands-on activities, and field trips as learning opportunities for students. However, the educational plan included in Attachment II to the contract did not provide a sufficient level of information about how the online and classroom curriculum is used, the daily classroom schedule, the minimum number of classroom hours required, the number of online hours required, and how student progress and attendance will be measured. In addition, the contract did not identify a second site the Utica Shale Academy uses for public instruction of students. Under Ohio Revised Code Section 3314.03(A), each community school contract must specify the education program of the school, the facilities to be used, including locations, and a description of the learning opportunities that will be offered to students including both classroom-based and non-classroom-based learning opportunities.

As a result, we are referring these matters to ODE for further investigation.

**Status of Prior Year Recommendations**

AOS prepared the tables below to summarize the status of AOS recommendations made to the General Assembly and ODE in the previous AOS *Community School Student Attendance* report dated January 22, 2015. The schedule indicates whether AOS considers each recommendation is unaddressed, no longer valid, or not warranting further action.

<b>Prior Year Recommendations to the General Assembly</b>		
<b>Title</b>	<b>Summary of Prior Year Recommendation</b>	<b>Status</b>
<i>Prior Year Annualized FTE</i>	While Am. Sub. HB 555 of the 129 <sup>th</sup> General Assembly and modifications in policy made by ODE in the August 2014 edition of the fiscal year 2014 SOES Manual reduced the risk of overfunding a newly opened community school, there is nothing in law to reduce the risk of overfunding an existing community school based on summer estimates that may be inflated due to graduates from the preceding school year and other changes in enrollment (i.e., mobility of students).	<b>Unaddressed</b>  This condition continues to result in occasional community school audits reports identifying Findings for Recovery due to overfunding State Foundation as a result of inflated FTE estimates in the summer months.
<i>Segregation of Duties</i>	The current structure of community school laws in Ohio lacks appropriate segregation of duties. ODE is statutorily required to oversee community school sponsors; act as a sponsor itself under certain circumstances; collect enrollment and performance data for community schools; calculate and provide funding to community schools; and develop academic, performance, and financial policies for community schools. ODE is also charged with overseeing community school sponsors and monitoring the academic, fiscal, and enrollment data reported by community schools. ODE then subsequently reports the financial and academic results of community schools to the public and ensures penalties and consequences for nonperformance or noncompliance are carried out.	<b>Unaddressed</b>  Under Ohio's current statutory structure, Ohio continues to commingle the roles of authorization and oversight duties within ODE.
<i>Conflict of Interest</i>	Ohio did not require a community school's governing board to be independent of its management company.	<b>Does not appear to warrant further action</b>  Am. HB 2 of the 131 <sup>st</sup> General Assembly included several provisions improving the independence of community school board members, fiscal officers, and legal counsel and preventing potential conflicts of interests with both management

<b>Prior Year Recommendations to the General Assembly</b>		
<b>Title</b>	<b>Summary of Prior Year Recommendation</b>	<b>Status</b>
		companies and community school sponsors.
<i>Dropout Recovery and Prevention Schools</i>	Due to the low attendance rates AOS observed for DORP's in the prior year's community school student head count, AOS believes there is an increased incentive for DORP schools to report higher than actual FTE estimates.	<b>Unaddressed</b>  While Am. HB 2 of the 131 <sup>st</sup> General Assembly includes additional changes in performance reporting requirements for DORP community schools, the bill did not specify additional oversight or monitoring for DORP community schools as compared to other community schools.
<i>Blended Learning</i>	The lack of clearly defined minimum standards for blended learning models makes it difficult for sponsors and others, including auditors, to evaluate compliance with community school learning opportunities.	<b>Unaddressed</b>
<i>Community School Guarantee Mechanism</i>	Due to the increased risk of community schools closing with outstanding obligations that cannot be paid, the legislature and/or ODE should institute a guarantee mechanism for every community school to cover outstanding obligations, regardless of the sponsor.	<b>Partially addressed</b>  Am. HB 2 of the 131 <sup>st</sup> General Assembly requires AOS to require the fiscal officer of any community school to execute a surety bond , in an amount as approved by the community school's governing board, conditioned upon faithful performance of duties.  Am. HB 2 also requires newly opened community schools to post a bond, cash deposit, or written guarantee from the sponsor or operator with the State to pay up to \$50,000 toward the costs of a closing audit.

<b>Prior Year Recommendations to the ODE</b>		
<b><i>Title</i></b>	<b><i>Summary of Prior Year Recommendation</i></b>	<b><i>Status</i></b>
<i>Update of Manuals</i>	AOS found neither the ODE EMIS Manual nor SOES Manual were updated for the 2014-2015 school year. Additionally, copies of a PowerPoint presentation were the only publicly available sources of information regarding the EMIS rewrite and consolidation of SOES on ODE's website. These presentations did not provide a sufficient level of detail to direct EMIS coordinators or other EMIS stakeholders not physically in attendance during ODE's conference through the system changes or new requirements.	<b>Addressed</b>  ODE updated the technical portions of the ODE EMIS Manual for the 2015-2016 school year as of the date of this report. Additionally, ODE does not plan to update the SOES Manual due to the consolidation of SOES and EMIS in the 2014-2015 school year. Instead, ODE included the relevant technical parts of the SOES Manual as "wiki's" in the ODDEX system and split up the remaining policy guidance on its website in several documents.
<i>Monthly Reporting of FTE Estimates</i>	ODE uses monthly enrollment information as the basis for its Foundation payments to community schools. There is an increased risk of loss of the state's Foundation funding if the community school closes or fails to accurately revise its reported enrollment projections.	<b>Addressed</b>  ODE updated its FTE Review and Community School Enrollment Handbook in January 2016 to clarify reporting requirements. Also, ODE has increased the number of annual FTE reviews for community schools and has formed a workgroup to identify and refine processes surrounding the FTE reviews outlined in the Handbook.  Additionally, new start-up community schools must report actual enrollment in SOES, a subcomponent of EMIS, in order for the community school to begin receiving State Foundation funding.

<b>Prior Year Recommendations to the ODE</b>		
<b><i>Title</i></b>	<b><i>Summary of Prior Year Recommendation</i></b>	<b><i>Status</i></b>
<i>SOES Flagging System</i>	The SOES flagging system used to identify students that are being claimed for Foundation funding purposes by more than one school (community school or traditional school) was not operational from July through most of November 2014 due to the EMIS Redesign.	<p><b>Addressed</b></p> <p>After the issuance of our prior year <i>Community School Student Attendance</i> report, ODE continued to experience problems with the SOES flagging system throughout the remainder of the 2014-2015 school year.</p> <p>As of the date of this report, ODE expects to finalize State Foundation funding related to the 2014-2015 school year for all schools by the end of June 2016. ODE has also made available the Student Cross Reference (SCR) report to schools within ODDEX. Schools are able to use the SCR report to track enrollment of students on a statewide basis.</p> <p>Additionally, because enrollment data is now roughly the same data used for State Foundation funding and report card accountability, ODE experienced significant delays in closing the FTE reporting window for the 2014-2015 school year. This was due to schools not receiving results back from the PARCC assessment tests timely for the 2014-2015 school year. These test results must be reviewed by schools before FTE related to enrollment can be finalized.</p>

<b>Prior Year Recommendations to the ODE</b>		
<b><i>Title</i></b>	<b><i>Summary of Prior Year Recommendation</i></b>	<b><i>Status</i></b>
		Ohio no longer uses PARCC assessment tests and law now requires timely return of assessment test data.
<i>Blended Learning</i>	ODE should develop minimum standards for documentation and provide best practice policies and tools to sponsors that can be used as a guide in developing their curriculum oversight policies and documentation requirements.	<p><b>Partially Addressed</b></p> <p>HB 2, effective in February 2016, now requires additional, specific information about a community school's use of blended learning to be included in the sponsor-approved contract/charter.</p> <p>Additionally, ODE believes the new sponsor evaluation process will help to ensure compliance with blended learning requirements.</p> <p>However, as described more fully starting on page 15 of this report, AOS identified three community schools in which concerns were noted with blended learning, credit flexibility, and related criteria that are being referred to ODE for further investigation.</p> <p>ODE acknowledges that more guidance is needed in the area of blended learning and is working to bolster and clarify its blended learning guidance.</p>

## Conclusions & Recommendations

While the General Assembly took significant action to reform charter school laws and ODE has redesigned EMIS, weaknesses continue to exist in certain key areas limiting the effectiveness and reliability of community school oversight, reporting, and funding. In particular:

- **Update of Manuals and Training** – As described in the Status of Prior Year Recommendations section of this report, ODE’s EMIS and other pertinent manuals have not been updated timely in recent years to reflect significant changes to the EMIS and SOES systems. Additionally, traditional and community schools have reported a shortage of available training opportunities on EMIS changes and requirements. These weaknesses likely contributed to the inaccurate reporting of FTE’s for the 2014-2015 school year. ODE must prioritize the timely update and dissemination of its EMIS and related manuals and provide more EMIS stakeholder training over student enrollment reporting requirements to schools. Also, the General Assembly should consider whether ODE has an appropriate level of human and capital resources to maintain EMIS, make required updates in a timely fashion, and provide robust training on substantive EMIS changes to schools.
- **Segregation of Duties** - ODE has struggled to effectively manage and balance its major responsibilities and resources, including most recently a critical redesign of EMIS and the implementation of a community school sponsor evaluation system that failed to comply with statutory requirements and deadlines.

As the pressures facing ODE continue to grow, so too does the need for the General Assembly to improve the efficiency and effectiveness of school administration, oversight, and accountability. Ohio lacks appropriate segregation of duties in Education. Segregation of duties involves dividing responsibilities so that a single department or individual does not control all critical stages of a process. Generally, the following five activities in any department or agency need to be considered for segregation, where possible:

- Planning and policy development
- Implementation and change management
- Approval and authorization
- Outcome Reporting
- Monitoring or oversight

ODE is statutorily required to oversee traditional schools and community schools; monitor and evaluate community school sponsors; act as a sponsor itself under certain circumstances; administer teacher licensure; collect enrollment and performance data for schools; calculate and distribute funding to schools; and develop academic, performance, and financial policies for schools. ODE is also charged with managing the State’s Education Management Information System (EMIS) and monitoring the academic, fiscal, and enrollment data reported by schools in Ohio. ODE then subsequently reports the financial and academic results of both traditional and community schools to the public and ensures penalties and consequences for nonperformance or noncompliance are carried out.

Proper segregation of duties increases the State’s ability to create accurate and meaningful financial and performance information and reporting. The General Assembly should separate the authorization and oversight duties within Education and assign them to different State agencies.

In addition, the General Assembly should consider separating the EMIS function from the Department of Education and housing this function in another existing state agency or creating a separate state agency dedicated to the design and maintenance of EMIS. It is important to understand that EMIS is not a software application, nor is it a stand-alone system. Rather, EMIS

is a process – a process by which schools report student enrollment, attendance, and other data to the ODE. This data is the backbone of the State’s school funding and performance reporting systems. Ohio’s EMIS was designed to collect and produce student data for all schools with a very high level of precision. However, this level of precision comes with great resource needs and costs.

ODE’s lack of adequate committed resources has caused significant delays and hurdles in the roll-out of the EMIS redesign project, a process that began eight years ago and is still not fully operational. Without a long-range plan and an investment in Ohio’s EMIS resources, ODE cannot effectively identify or prevent future EMIS data processing issues that may potentially lead to material miscalculation of state Foundation funding or misreporting of Federal report card information. Therefore, we recommend the General Assembly reform Ohio’s EMIS system by introducing independent oversight and verification. EMIS monitoring functions should be performed by an independent agency or commission appointed by the General Assembly. While such measures would require legislative change, the General Assembly’s empowerment of an outside commission or another State department to conduct accountability monitoring would strengthen Ohio’s student data quality and increase the effectiveness and efficiency of Ohio’s education information management.

Moreover, the General Assembly should consider its ability to maximize and leverage resources by empowering this separate agency to also perform and oversee the data accountability functions for colleges and universities. Currently, the Ohio Department of Higher Education performs these duties for colleges and universities. However, there is an important nexus in the level of experience and sophistication of systems required for education data management in general that could be capitalized upon by separating and consolidating these two areas into a single, independent state agency. Conversely, as another alternative, there is a strong connection between the EMIS accountability function and the Office of Budget and Management’s (OBM) financial management and policy expertise that could be leveraged by transferring the EMIS function to OBM.

- **Blended Learning** – While HB 2, effective in February 2016, now requires additional, specific information about a community school’s use of blended learning to be included in the sponsor-approved contract/charter, there is little guidance in current law advising sponsors about how to evaluate a blended learning curriculum for appropriateness and sufficiency. During our review of sponsor contracts, educational plans, and descriptions of blended learning opportunities, AOS noted the language contained in these documents was ambiguous. The lack of regulatory guidance and unclear contractual language made it difficult for AOS to evaluate the community schools’ compliance with the minimum number of learning opportunities a community school must provide to students in a blended learning environment. Additionally, it was unclear in some cases how a community school should document student participation in a blended learning venue outside of the classroom. ODE should develop minimum standards for documentation and provide best practice policies and tools to sponsors that can be used as a guide in developing their curriculum, oversight policies, and documentation requirements.

ODE should discourage sponsors from using boilerplate language in their sponsor contracts with community schools. During our review of sponsor contracts for the selected community schools, we noted some sponsors included boilerplate language for blended learning opportunities in their educational plans for community schools. AOS believes it is critical for a community school to have an in-depth discussion with its sponsor before the community school implements blended learning opportunities in its educational plan. These discussions should include a detailed evaluation by the sponsor of the sufficiency of the curriculum and hours of learning opportunities to be provided as well as the policies and rules for documenting student attendance and participation in a blended learning environment.

Additionally, under current statute it is difficult to determine whether community schools must provide a minimum amount of classroom instruction. Site-based community schools are community schools where at least some of their instruction is provided in a brick-and-mortar facility. 34 CFR 222.176 Subpart L defines the term school facility as “a building used to provide free public education, including instructional, resource, food service, and general or administrative support areas...” AOS noted during the head count one site-based community school using a sponsor approved blended learning model to provide classroom instruction via an online Virtual Learning Academy (VLA). The community school did provide a classroom facility for the students; however, the classroom instruction included working in their online curriculum (VLA), guest speakers, class discussions on course topics, hands on activities, field trips, and certification trainings.

The General Assembly should better distinguish between the legal definitions of blended learning and internet-based schools. Further, the valuation of online components should have some independent review and approval. This could be accomplished through ODE, through the sponsors by contract, or by the certification by ODE of independent contractors and their methodologies.

In addition, because blended learning is more difficult to supervise, the General Assembly may wish to consider limiting such programs to only highly ranked sponsors.

- **Dropout Recovery and Prevention Schools** – Dropout Recovery and Prevention (DORP) schools provide life-changing education for those students who persevere. Because their student population is at the high end of the risk scale, current law provides several exceptions to and waivers for community schools serving primarily dropout recovery students. As can be expected, AOS found the DORP schools had the highest non-attendance during the head count. While it is beyond the scope of AOS’s expertise to make recommendations regarding how to increase attendance at DORP schools, AOS believes there is an increased risk of DORP schools reporting higher than actual FTE estimates. To help mitigate this risk, ODE and DORP school sponsors should develop procedures to monitor student attendance on a periodic basis to ensure actual FTE amounts are reported to ODE. ODE should also consider risk assessing DORP schools as higher risk during their annual selection of community schools for FTE review. In addition, sponsors of DORP schools should proactively report student attendance issues timely to ODE.
- **Credit Flexibility** – As described in more detail in the Head Count Results beginning on page 15, ODE has not established clearly defined minimum standards for credit flexibility which makes it difficult for sponsors and others, including auditors, to evaluate compliance with the 920-hour rule for community school learning opportunities. For example, AOS identified one site-based, dropout recovery and prevention community school providing learning opportunities to its students exclusively through non-computer-based correspondence work. Students are not required to report to a public school facility for instruction, nor does the site-based community school have a school facility that could adequately house all of its enrolled students for classroom instruction if desired. Site-based community schools are community schools where at least some of their instruction is provided in a brick-and-mortar facility. 34 CFR 222.176 Subpart L defines the term school facility as “a building used to provide free public education, including instructional, resource, food service, and general or administrative support areas...” It is difficult under current statute to determine the General Assembly’s intent for what constitutes an appropriate site-based community school curriculum model. It seems counterintuitive to assume the General Assembly intended a site-based community school to provide all of its learning opportunities to students via a non-classroom-based educational plan.
- **Contracts/Charters** - A community school contract or charter is a legally binding document signed by both the governing authority and the sponsor/authorizer agreeing to fulfill all requirements as required by Ohio Rev. Code §3314.03. Specifications of the contract are between the sponsor/authorizer and the governing authority. Contracts must be adopted by

March 15 and signed by May 15 in the year prior to the proposed school opening by the sponsor/authorizer board and the community school governing authority.

A Governing Authority Resolution is needed for all contract/charter modification requests made to ODE. Additionally, for contract/charter modifications to enrollment, schools and their sponsors must provide the following to ODE:

- Copy of School's Governing Authority Resolution
- Revised Educational Plan-Attendance Area Section
- Revised Financial Plan if enrollment increased as a result of the change in enrollment area
- Revised Governance Plan-Admission Standards, including Lottery Language for admission

During our head count, we identified questions about whether certain community school contracts were wholly in compliance with the structure and requirements of Ohio's community school contract laws. As a result, as described more fully in the Head Count Results section of this report, AOS is referring these matters to ODE for further review.

Additionally, while ODE collects and maintains copies of the community school contracts/charters, ODE is not necessarily reviewing these contracts for compliance with state laws. Based on the statutory structure in current law, ODE believes it is the responsibility of the community school's sponsor to review and ensure the community school is operating in compliance with the contract/charter. However, some community school sponsors appear to lack the knowledge and training to make informed decisions about compliance. Therefore, ODE should consider periodically reviewing these contracts and interviewing community school management to determine whether the community school is in fact operating as intended. ODE might consider performing this contract review and interview with management in conjunction with the FTE review ODE performs for select community schools each year.

- **Conversion Community School Sponsor Training** – During our head count analysis, we noted conversion community schools and their sponsors had ambiguity in their contracts. As a result, these schools were referred to ODE for further investigation. AOS believes conversion schools and their sponsors would benefit greatly from additional ODE training opportunities regarding community school laws and regulations as they pertain to the conversion schools.
- **105 Hour Attendance Rule and Temporary Assistance for Needy Families (TANF)** – Ohio Rev. Code Section 3314.03 (A)(6)(b) requires community schools to maintain procedures for withdrawing students who fail to participate in one hundred five consecutive hours without a legitimate excuse. Also, as part of maintaining certain benefits under the Federal TANF program and in lieu of working, students must remain enrolled in school. Despite significant periods of non-attendance, community schools are funded for students until they are withdrawn for truancy upon 105 consecutive hours of absences.

As an example, under existing law, a charter school must withdraw a student who misses more than 105 consecutive hours of school. That amounts to nearly a month. If the student misses 104 hours, then shows up for a single day, the student gets a new 105-hour clock, and the school is not required to withdraw the student – and the school continues to receive funding for that student. In effect, it is possible for a student to show up for as few as 10 days of school and receive funding for an entire year.

During our prior year student count, community school management explained the challenges they face daily with non-attendance of students. Frequently, particularly among DORP schools, students will attend the bare minimum number of required hours to remain enrolled in school but

fail to actively participate in learning opportunities in an effort to maintain TANF benefits and avoid working.

AOS is unable to determine how widespread the practice is; however, we believe it is a vulnerability in the system as currently designed that could be exploited. We recommend the general assembly address this vulnerability. One consideration in addressing this issue would be to revamp the 105-hour rule for truant community school students to be more in line with the State's truancy statute used for traditional schools.

AOS updated its regular community school compliance audit procedures to ensure auditors have sufficient information to perform more effective, cost-efficient tests of community school enrollment in fiscal year 2015-2016 and subsequent audit periods.

The AOS office extends its gratitude to the State Board of Education, the ODE, and the many community schools, management companies, and sponsors throughout the State that supported and cooperated with this review. The Auditor of State also expresses his appreciation to The John Glenn School of Public Affairs at The Ohio State University for its valuable contribution to this report.

## Appendix A – AOS Head Count Community School Directory

	IRN	School Name	County	Sponsor	Management Company	School Type
1	013249	Academy of Urban Scholars Youngstown	Mahoning	Buckeye Community Hope Foundation	National Center for Urban Solutions	DORP
2	013198	Brookwood Academy	Franklin	Reynoldsburg City School District	None	Start-up
3	009163	C.M. Grant Leadership Academy	Franklin	St. Aloysius Orphanage	The Leona Group	Start-up
4	013255	Canton College Preparatory School	Stark	Ohio Council of Community Schools	I Can Schools	Start-up
5	012044	Capital High School	Franklin	Educational Resource Consultants of Ohio	Edison Learning	DORP
6	000557	Columbus Arts & Technology Academy	Franklin	Ohio Council of Community Schools	Pansophic/ACCEL	Start-up
7	008283	Dayton Technology Design High School	Montgomery	Dayton City School District	None	DORP
8	133264	Dohn Community	Hamilton	Kids Count of Dayton, Inc.	None	DORP
9	012031	Entrepreneurship Preparatory School - Woodland Hills Campus	Cuyahoga	Cleveland Municipal School District	None	Start-up
10	000131	Glass City Academy	Lucas	Education Services Center of Lake Erie West	None	DORP
11	014091	Hope Learning Academy	Lucas	North Central Ohio Educational Service Center	None	Conversion
12	011976	Horizon Science Academy Dayton Downtown	Montgomery	Buckeye Community Hope Foundation	Concept Schools	Start-up
13	014139	Imagine Columbus Primary School	Franklin	North Central Ohio Educational Services Center	None-	Conversion
14	133835	Invictus High School	Cuyahoga	St Aloysius Orphanage	Cambridge Education Group	DORP
15	009957	Klepinger Community School	Montgomery	St. Aloysius Orphanage	None	Start-up
16	143164	Life Skills Center Of Hamilton County	Hamilton	Ohio Council of Community Schools	White Hat Management	DORP
17	133785	Life Skills Ctr Of Cincinnati	Hamilton	St Aloysius Orphanage	White Hat Management	DORP
18	133801	Life Skills Ctr Of Youngstown	Mahoning	St Aloysius Orphanage	White Hat Management	DORP
19	151027	London Academy	Madison	London City School District	None	DORP
20	000318	Menlo Park Academy	Cuyahoga	Education Services Center of Lake Erie West	None	Start-up
21	134213	Middlebury Academy	Summit	St. Aloysius Orphanage	Cambridge Education Group	Start-up

	IRN	School Name	County	Sponsor	Management Company	School Type
22	000780	Midnimo Cross Cultural Community School	Franklin	North Central Ohio Educational Service Center	None	Conversion
23	143123	Mound Street Military Careers Academy	Montgomery	Montgomery County Educational Services Center	None	DORP
24	000953	Mt. Healthy Preparatory and Fitness Academy	Hamilton	Ohio Council of Community Schools	Performance Academies	Start-up
25	008280	Noble Academy-Columbus	Franklin	Buckeye Community Hope Foundation	Concept Schools	Start-up
26	012054	North Central Academy	Seneca	North Central Ohio Educational Service Center	None	Conversion
27	143529	North Dayton School Of Science & Discovery	Montgomery	Education Services Center of Lake Erie West	None	Start-up
28	133736	Richard Allen Academy I	Montgomery	Office of School Sponsorship	The Institute of Management and Resources	Start-up
29	143560	Richard Allen Academy II	Montgomery	Office of School Sponsorship	The Institute of Management and Resources	Start-up
30	133348	Richard Allen Preparatory	Montgomery	Office of School Sponsorship	The Institute of Management and Resources	Start-up
31	133488	River Gate High School	Trumbull	St. Aloysius Orphanage	Cambridge Education Group	DORP
32	000510	Springfield Preparatory and Fitness Academy	Clark	Ohio Council of Community Schools	Performance Academies	Start-up
33	012644	STEAM Academy of Warren	Trumbull	Office of School Sponsorship	Pansophic	Start-up
34	132779	Summit Academy Akron Middle School	Summit	Education Services Center of Lake Erie West	Summit Academy Management	Start-up
35	000298	Summit Academy Secondary - Akron	Summit	Education Services Center of Lake Erie West	Summit Academy Management	Start-up
36	000634	Summit Academy Secondary School - Middletown	Butler	Education Services Center of Lake Erie West	Summit Academy Management	Start-up
37	000608	Summit Academy Transition High School-Cincinnati	Hamilton	Education Services Center of Lake Erie West	Summit Academy Management	Start-up
38	133868	Towpath Trail High School	Summit	St. Aloysius Orphanage	Cambridge Education Group	DORP
39	014063	University Academy	Summit	Buckeye Community Hope Foundation	ACCEL School	Start-up
40	012541	University of Cleveland Preparatory School	Cuyahoga	Ohio Council of Community Schools	None	Start-up
41	149062	Urbana Community School	Champaign	Urbana City School District	META Solutions	DORP
42	014830	Utica Shale Academy of Ohio	Columbiana	Jefferson County Educational Services Center	None	Conversion
43	011291	Village Preparatory School	Cuyahoga	Cleveland Municipal School District	None	Start-up
44	013059	West Carrollton Secondary Academy	Montgomery	West Carrollton City School District	None	DORP
45	000875	Westside Academy	Franklin	Buckeye Community Hope Foundation	None	Start-up

**Appendix B – AOS Head Count Results and Analysis – Dropout Recovery and Prevention (DORP) schools**

	IRN	School Name	AOS Head Count	ODE November 9 <sup>th</sup> Head Count	November 2015 FTE	November 2015 Variance	One Standard Deviation from Average November 2015 Difference %	Attendance Rate
1	149062	Urbana Community School	0	50	38.70	-100.00%	80.9%	0.00%
2	151027	London Academy	10	270	123.35	-91.89%	80.9%	8.11%
3	133868	Towpath Trail High School	63	282	282.09	-77.67%	80.9%	22.33%
4	133835	Invictus High School	110	402	401.14	-72.58%	80.9%	27.42%
5	133264	Dohn Community	106	383	368.97	-71.27%	80.9%	28.73%
6	000131	Glass City Academy	78	220	236.94	-67.08%	80.9%	32.92%
7	013249	Academy of Urban Scholars Youngstown	61	147	159.80	-61.83%	80.9%	38.17%
8	013059	West Carrollton Secondary Academy	27	74	68.79	-60.75%	80.9%	39.25%
9	143123	Mound Street Military Careers Academy	19	42	47.48	-59.98%	80.9%	40.02%
10	133785	Life Skills Ctr Of Cincinnati	63	160	148.71	-57.64%	80.9%	42.36%
11	008283	Dayton Technology Design High School	84	176	174.96	-51.99%	80.9%	48.01%
12	133488	River Gate High School	65	132	130.40	-50.15%	80.9%	49.85%
13	133801	Life Skills Ctr Of Youngstown	44	83	87.73	-49.85%	80.9%	50.15%
14	012044	Capital High School	124	249	247.08	-49.81%	80.9%	50.19%
<b>Average Attendance Rate for Dropout Recovery and Prevention (DORP) Schools</b>								<b>34.11%</b>

**Appendix C – AOS Head Count Results and Analysis – Start-up and Conversion schools**

	IRN	School Name	County	School Type	AOS Head Count	ODE November 9 <sup>th</sup> Head Count	November 2015 FTE	November 2015 Variance	One Standard Deviation from Average November 2015 Difference %	Attendance Rate
1	014830	Utica Shale Academy of Ohio	Columbiana	Conversion	20	70	68.32	-70.73%	26.5%	29.27%
2	013198	Brookwood Academy	Franklin	Start-up	92	126	124.34	-26.01%	26.5%	73.99%
3	009163	C.M. Grant Leadership Academy	Franklin	Start-up	82	107	110.20	-25.59%	26.5%	74.41%
4	012644	STEAM Academy of Warren	Trumbull	Start-up	188	242	251.92	-25.37%	26.5%	74.63%
5	000298	Summit Academy Secondary - Akron	Summit	Start-up	50	66	64.07	-21.96%	26.5%	78.04%
6	134213	Middlebury Academy	Summit	Start-up	237	271	302.73	-21.71%	26.5%	78.29%
7	014139	Imagine Columbus Primary School	Franklin	Conversion	176	217	221.80	-20.65%	26.5%	79.35%
8	009957	Klepinger Community School	Montgomery	Start-up	352	426	428.54	-17.86%	26.5%	82.14%
9	013255	Canton College Preparatory School	Stark	Start-up	191	224	230.99	-17.31%	26.5%	82.69%
10	014063	University Academy	Summit	Start-up	144	177	171.53	-16.05%	26.5%	83.95%
11	000608	Summit Academy Transition High School- Cincinnati	Hamilton	Start-up	76	87	88.44	-14.07%	26.5%	85.93%
12	012541	University of Cleveland Preparatory School	Cuyahoga	Start-up	336	377	381.91	-12.02%	26.5%	87.98%

	IRN	School Name	County	School Type	AOS Head Count	ODE November 9 <sup>th</sup> Head Count	November 2015 FTE	November 2015 Variance	One Standard Deviation from Average November 2015 Difference %	Attendance Rate
13	008280	Noble Academy-Columbus	Franklin	Start-up	279	314	316.65	-11.89%	26.5%	88.11%
14	000953	Mt. Healthy Preparatory and Fitness Academy	Hamilton	Start-up	274	296	309.60	-11.50%	26.5%	88.50%
15	000634	Summit Academy Secondary School - Middletown	Butler	Start-up	81	90	90.00	-10.00%	26.5%	90.00%
16	012031	Entrepreneurship Preparatory School - Woodland Hills Campus	Cuyahoga	Start-up	262	291	288.73	-9.26%	26.5%	90.74%
17	132779	Summit Academy Akron Middle School	Summit	Start-up	38	41	41.86	-9.22%	26.5%	90.78%
18	000557	Columbus Arts & Technology Academy	Franklin	Start-up	488	533	536.38	-9.02%	26.5%	90.98%
19	000780	Midnimo Cross Cultural Community School	Franklin	Conversion	99	103	108.55	-8.80%	26.5%	91.20%
20	011291	Village Preparatory School	Cuyahoga	Start-up	410	441	442.87	-7.42%	26.5%	92.58%
21	133736	Richard Allen Academy I	Montgomery	Start-up	71	76	76.66	-7.38%	26.5%	92.62%
22	014091	Hope Learning Academy	Lucas	Conversion	59	63	62.92	-6.23%	26.5%	93.77%
23	133348	Richard Allen Preparatory	Montgomery	Start-up	125	133	132.96	-5.99%	26.5%	94.01%
24	143529	North Dayton School Of Science & Discovery	Montgomery	Start-up	575	615	603.62	-4.74%	26.5%	95.26%

	IRN	School Name	County	School Type	AOS Head Count	ODE November 9 <sup>th</sup> Head Count	November 2015 FTE	November 2015 Variance	One Standard Deviation from Average November 2015 Difference %	Attendance Rate
25	000510	Springfield Preparatory and Fitness Academy	Clark	Start-up	169	174	176.81	-4.42%	26.5%	95.58%
26	011976	Horizon Science Academy Dayton Downtown	Montgomery	Start-up	217	236	226.48	-4.19%	26.5%	95.81%
27	143560	Richard Allen Academy II	Montgomery	Start-up	306	317	319.03	-4.08%	26.5%	95.92%
28	000318	Menlo Park Academy	Cuyahoga	Start-up	350	370	364.80	-4.06%	26.5%	95.94%
29	012054	North Central Academy	Seneca	Conversion	96	105	99.48	-3.50%	26.5%	96.50%
30	000875	Westside Academy	Franklin	Start-up	203	210	203.31	-0.15%	26.5%	99.85%
<b>Average Attendance Rate for Start-up and Conversion Schools</b>										<b>86.29%</b>

## Appendix D – Head Count Results and Analysis – Traditional Schools

	IRN	School Name	County	Type of School	AOS Head Count	ODE November 9 <sup>th</sup> Head Count	ODE November 9 <sup>th</sup> FTE	November 2015 Variance	Attendance Rate
1.	023259	Max S. Hayes High School	Cuyahoga	High School	500	675	664.67	-24.77%	75.23%
2.	038950	Waite High School	Lucas	High School	720	891	859.94	-16.27%	83.73%
3.	031427	Hannah Ashton Middle School	Franklin	Middle School	413	480	468.22	-11.79%	88.21%
4.	036152	Stivers School for the Arts	Montgomery	High School	767	871	868.33	-11.67%	88.33%
5.	000497	Alpine Elementary School	Franklin	Elementary School	452	521	501.44	-9.86%	90.14%
6.	027268	Noble (4-5)	Seneca	Elementary School	388	417	414.20	-6.33%	93.67%
7.	009511	Phoenix Middle School	Franklin	Alternative Middle School	156	163	163.00	-4.29%	95.71%
8.	018507	Jonathan Alder High School	Madison	High School	493	562	506.87	-2.74%	97.26%
9.	118414	Cuyahoga Heights Middle School	Cuyahoga	Middle School	168	173	172.32	-2.51%	97.49%
10.	081802	Woodland Elementary School	Wood	Elementary School	582	613	582.42	-0.07%	99.93%
<b>Average Attendance Rate for Traditional Schools</b>									<b>90.97%</b>

## Appendix E – Glossary

This glossary defines the terms used throughout this report. The definition of these terms was derived from various sources including, but not limited to, statute and ODE Manuals and Handbooks.

**Attendance** – participation in learning opportunities provided by a community school as defined in the community school's contract with its sponsor. This would include log in by a student enrolled in an E-School. It does not include days on which only the following activities occur: enrollment, testing, or orientation (Ohio Rev. Code §3314.03).

**Blended Learning** – Blended learning is the permissible delivery of educational instruction for site-based community schools. "Blended learning" means the delivery of instruction in a combination of time in a supervised, physical location away from home and online delivery where the student has some element of control over time, place, path, or pace of learning. Community schools that offer blended learning are permissible under the law (Ohio Rev. Code §3301.079 (K)(1)).

**Brick-and-Mortar School Facility** – A building used to provide free public education, including instructional, resource, food service, and general or administrative support areas, so long as they are part of the facility (34 CFR 222.176).

**Credit Flexibility** – Permits students to meet core coursework requirements in four ways: traditional classroom, integrated learning, applied learning or career-technical learning. Through credit flexibility, students can earn credit through classroom instruction, demonstration of subject area competency, or a combination of both. ODE is statutorily required to develop guidelines for credit flexibility (authorized by the State Board of Education under the *Alternative Pathways* legislation).

**Enrollment** – As defined in Ohio Rev. Code §3314.08 (L)(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 EMIS. (This means that enrollment for a year cannot be on the first day of offered instruction if the student did not attend on the first day and did not have an excused absence. There can be no carryover of the 105-hour rule from a previous school year or after a withdrawal.)

**E-School** – "Internet- or computer-based community school" established under this chapter in which the enrolled students work primarily from their residences on assignments in nonclassroom-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 noncomputer-based learning opportunities unless a student receives career-technical education under section 3314.086 of the Revised Code (Ohio Revised Code Section 3314.02(A)(7)).

**FTE: Full-time equivalency** – That portion of the school year a student was educated, as determined by the number of either days or hours of instruction provided to a student during a school year divided by its annual membership units (the total number of either days or 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 entity profile within EMIS).

**Head Count** – The number of students enrolled in a community school, on either a full- or part-time status, at any a particular point in time.

**Site-Based Community School** – A community school where its students receive instruction in a brick-and-mortar facility.

## Appendix F – References

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# Dave Yost • Auditor of State

## SECOND COMMUNITY SCHOOL STUDENT ATTENDANCE COUNT REPORT

### STATEWIDE COUNTY

#### CLERK'S CERTIFICATION

This is a true and correct copy of the report which is required to be filed in the Office of the Auditor of State pursuant to Section 117.26, Revised Code, and which is filed in Columbus, Ohio.

*Susan Babbitt*

CLERK OF THE BUREAU

CERTIFIED  
MAY 23, 2016