

John R. Kasich, Governor
Dr. Lonny J. Rivera, Interim Superintendent of Public Instruction

May 4, 2016

Robert Hinkle
Chief Deputy Auditor
Ohio Auditor of State
88 E. Broad Street
Columbus, OH 43215

Dear Chief Deputy Auditor Hinkle,

Thank you for your inquiry regarding the Department of Education's FTE review process and, specifically, recent media reports regarding our FTE review of Provost Academy. Attached is the final FTE review letter sent to Provost last fall. The letter largely outlines our concerns with the school's attendance policy, as well as our interpretation of law related to attendance tracking and accounting.

Field staff first questioned the funding claimed by Provost Academy through an examination of the school's attendance policy. The policy, as outlined in our final FTE review letter, did not comply with law. The policy equated one hour of computer log-on time as being equivalent to one day (5 hours) of attendance. It was the existence of this policy that led ODE to request the computer logs for each student, as well as any non-classroom, non-computer based learning opportunities in which students participated. The non-classroom, non-computer based learning opportunities is important to note. While not discussed in news reports, ODE did not rely solely on computer log-on records to arrive at an FTE based on learning opportunities. Provost Academy was also permitted to submit documentation of non-classroom, non-computer based learning opportunities. However, the school had not appropriately tracked this time for each student, therefore, few additional learning opportunities were presented.

The 2015 FTE Review and Community School Enrollment Handbook discusses tracking learning opportunities for both e-school and blended learning schools. ODE has not relied on computer log-ins alone to substantiate a school's claim of an FTE. The handbook discusses documentation of non-classroom, non-computer time. Specifically for e-schools, Page 16 of the 2015 handbook discusses computer log-on time, as well as the need to document the non-classroom hours in which the student accessed a learning opportunity. Non-classroom, non-computer learning activities are also discussed in the handbook, and an example of a student participation log is included. While the example is rudimentary in its layout and approach, the expectation is that each school be able to document the learning opportunities in which students are engaged. A review of this documentation is included in item #11 of the FTE Review Checklist (pp. 23-24). As you point out, there can be variety in the manner in which schools document learning opportunities, and the department continues to allow that flexibility. However, there is an expectation that documentation, be it computer log-ons or tracking of non-computer work be available during our reviews.

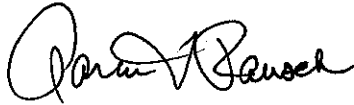
The draft 2016 handbook that is also posted online was updated following our experience with Provost Academy, the department's routine review of our internal processes, and implementation of HB 2. As described above through our experience with Provost Academy, the 2015 FTE handbook and procedures in place prior to HB 2 allowed ODE to examine detailed participation records for all community schools, including computer logs and documentation related to non-computer, non-classroom learning opportunities. These specifics were articulated in the 2016 update to the handbook.

The 2016 handbook has been considered a draft, as there was no opportunity for stakeholder input. ODE is in the process of soliciting stakeholder input to further strengthen the handbook and would like to invite the Auditor of State's office to participate in the process.

We are moving forward with FTE reviews for all community schools scheduled for the 2015-16 school year using the 2015 handbook. Using the 2015 handbook in no way impedes ODE's ability to comply with requirements of HB 2. The revisions to the draft 2016 FTE handbook simply clarified and better articulated current practice.

We would be happy to meet with you in person to discuss our FTE review of Provost Academy and answer any questions you have regarding our processes and the department's continued desire to refine and improve these processes to ensure effective accountability and oversight in the area of community school funding.

Regards,



Aaron Rausch
Director, Office of Budget and School Funding
Ohio Department of Education

CC:

Dr. Lonny Rivera, Interim Superintendent, Ohio Department of Education
Diane Lease, Chief Legal Counsel, Ohio Department of Education