



STATE OF IOWA

TERRY BRANSTAD, GOVERNOR
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DEPARTMENT OF EDUCATION
JASON E. GLASS, DIRECTOR

DATE: January 11, 2013

TO: The Honorable Members of the Iowa General Assembly

FROM: Director Jason E. Glass

SUBJECT: Iowa Code §257.7 - Report of Online Schools & Recommendations

During the 2012 legislative session, lawmakers amended Iowa Code section 256.7 to address online learning in the state of Iowa. In relevant part, the Iowa Department of Education was directed by legislation to conduct an annual survey of students attending online schools and to determine whether the students are enrolled to receive educational instruction and course content primarily over the internet or are students who are receiving competent private instruction from a licensed practitioner provided through a school district pursuant to Iowa Code Chapter 299A. Iowa Code § 256.7(33). Additionally, the Department was tasked with compiling and reviewing the data collected pursuant to 256.7(33)"c" and ordered to submit findings and recommendations for the continued delivery of instruction and course content by school districts operating online schools in a report to the general assembly by January 15.

The Department has conducted a survey of a hundred percent of students enrolled in online schools and compiled additional information from other resources to supplement the survey data. The Department has determined that neither K12 Inc. (Clayton Ridge Community School District) nor Iowa Connections Academy (CAM Community School District) is a HSAP as defined by Iowa Code section 299.2A. Furthermore, the evidence submitted overwhelmingly supports that K12 Inc. and Iowa Connections Academy are operating schools with educational instruction and course content delivered primarily over the internet. Notwithstanding the individual recommendations specific to each school, it is the Department's final recommendation, based on a review of the data collected that the continued delivery of instruction primarily over the internet pursuant to Iowa Code section 256.7(33)"c" be allowed.

We look forward to your careful consideration of this report and we appreciate the opportunity to serve as a resource to the Iowa General Assembly.

Sincerely,

A handwritten signature in black ink that reads "Jason E. Glass".

Jason E. Glass, Director
Iowa Department of Education

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MEMORANDUM

DATE: January 8, 2013
TO: Director Jason Glass
FROM: Nicole M. Proesch & Thomas Mayes – Legal Counsel
RE: Iowa Code § 256.7 – Report of Online Schools & Recommendations

I. BACKGROUND

During the 2012 legislative session, lawmakers amended Iowa Code section 256.7 to address online learning in the state of Iowa. In relevant part, the Iowa Department of Education was directed by legislation to conduct an annual survey of students attending online schools, to include not less than ten percent of the total number of students enrolled and not less than one hundred percent of students enrolled in online schools who are eligible for free and reduced price meals, and to determine whether the students are enrolled to receive educational instruction and course content primarily over the internet or are students who are receiving competent private instruction from a licensed practitioner provided through a school district pursuant to Iowa Code Chapter 299A. Iowa Code § 256.7(33).

Additionally, the Department is tasked with compiling and reviewing the data collected pursuant to 256.7(33)“c” and ordered to submit findings and recommendations for the continued delivery of instruction and course content by school districts operating online schools in a report to the general assembly by January 15.

II. DEMOGRAPHIC AND ACHIEVEMENT DATA

The Department has received the following demographic characteristics from both the Iowa Connections Academy at CAM Community School District (hereinafter “Connections”) and K12 Inc. at Clayton Ridge Community School District (hereinafter “K12”): (race, gender, poverty, disability, and ELL). Concerning the other data requests, a full academic year has not been completed, so data on student achievement, retention rates, and active participation in extracurricular activities is not yet available. That information will be available for the report due on January 15, 2014, and each report thereafter. *See* Appendix A.

III. SURVEY DATA

The Department conducted a survey of 100% of the students enrolled in both Connections and K12. *See* Appendix B. The surveys were conducted by Department staff via telephone for the student population in Kindergarten through third grade, and through an online survey for the students enrolled in grades four through twelve. The number surveyed, number of respondents, and response rate for each school are provided below.

School	Number of responses	Number surveyed	Response rate
CAM	93	235	39.57%
Clayton Ridge	31	67	46.27%

The response rates obtained are within rates expected when conducting survey research through telephone or online methods. Because response rates are highly variable and effect conclusions that can be drawn from survey research, the Department supplemented the survey with additional information, including:

- 1) Interviews with ten parents of students enrolled for each online school
- 2) An interview with the superintendent of each school
- 3) An interview with the principal of each school
- 4) Interviews with each of the teachers at the online schools
- 5) Interviews with staff from the Area Education Agency (AEA) serving each school
- 6) A review of district and school policies and procedures regarding compliance with state and federal code and regulations

7) An onsite visit of each school conducted by five members of the Department

The information and evidence compiled through the survey and supplemental information was utilized to answer the following questions tasked by legislation: whether K12 and Connections are operating an online school with educational instruction and course content delivered primarily over the internet or a Home School Assistance Program (hereinafter “HSAP”) under Iowa Code Chapter 299A with instruction from a licensed practitioner through a school district.

The survey data reflect that children know learning expectations, know how well they are doing in course work, and are involved in individual and group activities. While most children said that their parents were their “teachers,” this response pattern (which is stronger in grades K-3) can be understood as the children using the word “teacher” to mean “any authoritative and helpful adult,” rather than a person performing specific activities of a profession defined in the Iowa Administrative Code. The survey results are consistent with the recommendations set forth below.

IV. HOME SCHOOL ASSISTANCE PROGRAM (“HSAP”)

Under Iowa Code section 299A.1 “competent private instruction” (“CPI”) means private instruction provided on a daily basis for at least one hundred and eighty days during a school year, thirty-seven days each quarter, or under the supervision of a licensed practitioner under 299A.2, which results in the student making adequate progress.

Iowa Code § 299A.2 - Competent private instruction by a license practitioner provides in relevant part:

Competent private instruction may include but is not limited to a home school assistance program which *provides instruction or instructional supervision* offered through an accredited nonpublic school or public school district by *a teacher*, who is employed by the accredited nonpublic school or public school district, *who assists and supervises a parent, guardian, or legal custodian in providing instruction to a child*. (emphasis added).

Under section 299A.2 the licensed practitioner’s role is to assist and supervise the parent in providing instruction to the child. *Id.* In essence, the parent teaches the child and the teacher assists the parent and not the other way around. *See id.* “Supervision”

in the context of telecommunications is defined to mean that the curriculum is monitored by a licensed teacher and the teacher is assessable to the students receiving curriculum by means of telecommunications. Iowa Code § 256.7(7)(d)(2011, as amended). While this definition is not directly applicable to online schools it is instructive in this context. *Cf. id.*

Under a HSAP program or for a district providing dual enrollment services to home-schooled students, a licensed practitioner who instructs or provides instructional supervision has the following duties:

- a. contact with the child and the child's parent (or other) at least four times per quarter, half of which must be face to face;
- b. consulting with and advising the parent about any of the following as requested by the parent or as deemed necessary by the instructor: lesson plans, instructional materials, educational goals and objectives, teaching/learning techniques, evaluation of student learning, the student's strengths and weaknesses, interpretation of results, planning, and record keeping; (Note: The State of Iowa does not have a mandated curriculum for students who receive CPI. The type of curriculum and instructional materials is the decision of the parent);
- c. providing formal and informal assessments of the student's progress to the student and the parent;
- d. annually maintaining a diary, record, or log of visitation and assistance provided; and
- e. to maintain the districts "child find" obligations under IDEA, referring to the child's district of residence for evaluation any child the practitioner has a reason to believe may be in need of special education.

Iowa Admin. Code r. 281—31.4(3)(a-e).

The above criteria only requires that the licensed practitioner have minimal contact with the child and the child's parent each year. *See id.* The teacher has no input in lesson plans, instructional materials, educational goals and objectives, teaching/learning techniques, evaluation of student learning, the student's strengths and weaknesses, interpretation of results, planning, and record keeping unless the parent requests it. Nor, does the teacher have any involvement in the actual delivery of the curriculum to the child. Although, the teacher must provide formal and informal assessments of student progress, the child is not required to participate in state wide assessments. The threshold determination of whether or not these programs are HSAPs is whether the parent or the teacher is responsible for instructing the child.

The following questions along with a review of the evidence gathered from survey data, interview responses, data reviews, and document reviews may assist in answering this question:

- 1) Who is selecting the curriculum?
- 2) What is the curriculum? Is it aligned with the Iowa Core or other?
- 3) Is the curriculum required?
- 4) Who chooses the textbooks or online materials?
- 5) Who devises the lesson plans?
- 6) Who is teaching, as defined in Iowa Admin Code r. 281—12.4(8), the child?
- 7) Is instruction by a licensed teacher who has endorsements in the subject matter taught?
- 8) How much contact is the parent having with the student? Daily, weekly, monthly? What is the nature of the contact? Supportive? Instructive?
- 9) How much contact is the teacher having with the student? Daily, weekly, monthly? What is the nature of the contact? Supportive? Instructive?
- 10) How much contact is the teacher having with the parent? What is the nature of this contact? Supportive? Instructive?
- 11) How often is the child interacting with the curriculum? Daily, weekly, monthly?
- 12) Who monitors the child's progress?
- 13) Does the teacher provide feedback to the student or parent or both?
- 14) Is the child required to have regular assessments, including participation in district wide assessments?
- 15) Is attendance monitored and who monitors attendance?

If the evidence and the answers to the above questions show that the parent is responsible for instructing the child with the assistance of the teacher, then the program is a HASP. However, if in the alternative the evidence and the answers show that the teacher is responsible for instructing the child, then the program is not a HSAP.

A. K12 Inc. (Clayton Ridge Community School District)

The answers to the above questions have been compiled from the evidence gathered from K12's survey data of the students; interview responses of K12's superintendant, principal, teachers, and a sampling of the parents; data reviews; and document reviews of materials requested by the Department from K12. *See Appendix A, B, C.*

The evidence and answers to the above questions overwhelmingly support the conclusion that K12 and the teachers of K12, not the parents, are responsible for providing the content, curriculum, and the delivery of instruction to its' students at K12. The parent, under the supervision of the teacher, acts as an educational assistant and not as the teacher. Under these circumstances K12 is clearly not operating as a HSAP as defined under the Iowa Code section 299A.2. *See Iowa Code § 299A.2.*

B. Iowa Connections Academy (CAM Community School District)

The answers to the above questions have been compiled from the evidence gathered from Connections' survey data of the students; interview responses of the Connections' superintendant, principal, teachers, and a sampling of the parents; data reviews; and document reviews of materials requested by the Department from Connections. *See Appendix A, B, C.*

The evidence and answers to the above questions overwhelmingly support the conclusion that Connections and the teachers of Connections, not the parents, are responsible for providing the content, curriculum, and the delivery of instruction to its' students at Connections. The parent, under the supervision of the teacher, acts as an educational assistant and not as the teacher. Under these circumstances Connections is clearly not operating as a HSAP as defined under the Iowa Code section 299A.2. *See Iowa Code § 299A.2.*

V. "School"

Since neither program is a HSAP as defined in the Iowa Code section 299A.2, the next question is whether or not either program is operating as a "school" with educational instruction and course content delivered primarily over the internet. Online schools must meet all of the requirements of an accredited Regular Education

Program as provided in the Online Schools Matrix. See Appendix D. In pertinent part, under Iowa Administrative Code Chapter 281—12, an online school must have a school calendar of 180 days, a minimum school day of 5.5 hours of instructional time, and be under the guidance and instruction of instructional professional staff. A school calendar must identify specific days for student instruction, staff-development and in-service time, and time for parent teacher conferences. Iowa Admin. Code r. 281—12.1(7). A day of school is defined as a day during which the district is in session and the students are “under the guidance and instruction of instructional professional staff.” *Id.* r. 281—12.1(8).

“Under the guidance and instruction of instructional professional staff” means “daily, direct supervision.” Iowa Dep’t of Educ., Chapter 12 Rule Interpretation Matrix, 5 (Aug. 2012). A minimum school day consists of 5.5 hours of instructional time which may include passing time between classes and parent teacher conferences. Iowa Admin. Code r. 281—12.1(9). Consecutive school days may start at the end of one week and conclude in the following week and may include a weekend day if students are in school on the weekend day. Iowa Dep’t of Educ., Chapter 12 Rule Interpretation Matrix, 5 (Aug. 2012). A day during which the students are present and under the guidance and instruction of instructional staff is considered a day of attendance. Iowa Admin. Code r. 281—12.1(10). The threshold question here is what is “under the guidance and instruction of instructional professional staff” – “daily, direct supervision” in the online context.

There is no legislative definition of the term instruction used in the Iowa Code or Iowa Administrative code sections. Webster’s Dictionary defines instruction as follows: **in·struc·tion** – “1. The act of instructing; education; 2. a) knowledge, information, etc. given or taught b) by any teaching, lesson, rule, or precept; 3) a) a command or order b) details on procedure; directions.” *Webster’s New World Dictionary*, 730 (2nd College ed. 1976). Under Iowa Administrative Code rule 281—12.4(8) a “teacher” is defined as “a member of the instructional professional staff who holds a license/certificate endorsed for the type of position in which employed.”

A teacher diagnoses, prescribes, evaluates, and directs student learning in terms of the school’s objectives, either singly or in concert with other professional staff members; shares responsibility with the total professional staff for developing educational procedures and student activities to be used in achieving the school’s

objectives; supervises educational aides who assist in serving students for whom the teacher is responsible; and evaluates or assesses student progress during and following instruction in terms of the objectives sought, and uses this information to develop further educational procedures.

The amount of instruction or “daily, direct supervision,” received in the brick and mortar school is more easily determined by looking at the actual seat time of the students. This is not the case in an online school. However, it is informative that a day of school in a brick and mortar school may include parent teacher conferences, field trips, and passing time between classes. *See id.* r. 281—12.1(9); *see also* Iowa Dep’t of Educ., Chapter 12 Rule Interpretation Matrix, 4 (Aug. 2012). This suggests that instructional time does not have to be face to face time in the traditional context or actual seat time in a brick and mortar school. In the new era of online schooling instructional time should be redefined in the context of an internet interface utilizing live sessions, one-on-one sessions, message boards, emails, online course books, and phone conversations.

A. K12 Inc. (Clayton Ridge Community School District)

Applying the above legal principals to the facts found and evidence examined during interviews, documents reviews, and the onsite visit, K12 is by all measures a school. Unless specifically noted in this report, evidence showed that K12 met all of the elements of the Online Schools Matrix. *See* Appendix D. K12 has a calendar consistent with the Clayton Ridge Community School District which provides for 180 days of instruction. Parents under the honor code are responsible for recording a day of attendance and teachers can monitor this attendance through completion of work assignments and a review of the student’s academic progress. If the student’s attendance does not align with the student’s coursework completion, the teachers will contact the parents and the student to follow up. Students are required to log 5.5 hours of coursework each day. If students are not logging in or completing the required coursework on a regular basis the teachers immediately make contact with the parents and student. The teachers at K12 monitor excused and unexcused absences of each student and children are required to make up work if missed. The school is aware of its obligation to enforce compulsory attendance laws.

Data compiled from multiple sources shows that students of K12 have daily interactions with the curriculum and that their interaction is monitored by licensed instructional staff. This monitoring is through the use of a web based portal which records student attendance, course work, assignments, progress, and communications between the student and the teacher. The portal also allows for direct electronic communications to include live instructional sessions, live one-on-one instructional sessions, the use of message boards between the students and the teachers, internal email accounts, and real-time chat sessions. The primary mode of real-time instruction at K12 is through live instructional sessions. However, these live instructional sessions for most students occur minimally, only once a week, for language arts and mathematics. Other core subjects are not scheduled for a live session at all. In the other core subject's students interact with the course curriculum and make contact with the teacher as needed with any questions. Live one-on-one sessions may be scheduled depending on the individual needs of each student. Students can also make contact with the teacher on message boards, through email, or phone calls.

While the students at K12 do not have daily, direct supervision in the brick and mortar context they are having daily, direct supervision in their interactions with the curriculum and teachers. The form of the daily, direct supervision at K12 consist of working through the various applications in the web based portal which are developed by K12, aligned with the Iowa Core, and delivered and supervised by appropriately licensed teachers. Additionally, students are required to interact with the curriculum and teachers on a daily basis for a minimum of 5.5 hours.

B. Iowa Connections Academy (CAM Community School District)

Applying the above legal principals to the facts found and evidence examined during interviews, documents reviews, and the onsite visit, Connections is by all measures a school. Unless specifically noted in this report, evidence showed that Connections met all of the elements of the Online Schools Matrix. *See Appendix D.* Connections has a calendar consistent with the CAM Community School District which provides for 180 days of instruction. Parents under the honor code are responsible for recording a day of attendance and teachers can monitor this attendance through completion of work assignments and a review of the student's academic progress. If the student's attendance does not align with the student's coursework completion, the teachers will contact the parents and the student to follow up. Students are required to

log 6.0 hours of coursework each day. If students are not logging in or completing the required coursework on a regular basis the teachers immediately make contact with the parents and student. Connections' web based portal has a sophisticated notification system which notifies the administrator, teacher, parent, and student, when the student is reaching "alarm" for his or her lack of attendance. The teachers at Connections monitor excused and unexcused absences of each student and children are required to make up work if missed. The school is aware of its obligation to enforce compulsory attendance laws and has taken enforcement action and corrective measures with certain students who have had poor attendance.

Data compiled from multiple sources shows that students of Connections have daily interactions with the curriculum and that their interaction is monitored by licensed instructional staff. This monitoring is through the use of a web based portal which records student attendance, course work, assignments, progress, and communications between the student and the teacher. The portal also allows for direct electronic communications to include live instructional sessions, live one-on-one instructional sessions, the use of message boards between the students and the teachers, internal email accounts, and real-time chat sessions. The primary mode of real-time instruction at Connections is through live instructional sessions. However, these live instructional sessions for most students occur minimally, only thirty minutes each day across all subjects. In all core subjects students interact with the course curriculum and make contact with the teacher as needed with any questions. Live one-on-one sessions may be scheduled depending on the individual needs of each student. Students can also make contact with the teacher on message boards, through email, or phone calls.

While the students at Connections do not have daily, direct supervision in the brick and mortar context they are having daily, direct supervision in their interactions with the curriculum and teachers. The form of the daily, direct supervision consist of working through the various applications in the web based portal which are developed by Connections, aligned with the Iowa Core, and delivered and supervised by appropriately licensed teachers. Additionally, students are required to interact with the curriculum and teachers on a daily basis for a minimum of 6.0 hours.

VI. FINDINGS AND RECOMMENDATIONS

A. The Department recommends allowing continued delivery of instruction primarily over the internet pursuant to Iowa Code § 256.7(33)“c”

For several reasons, the Department recommends allowing continued delivery of instruction primarily over the internet. There is a research base which supports that online instruction can be an effective means of delivering educational course content.¹ Online education addresses a previously unmet need for certain students, such as those who are medically fragile or are frequently away from home, who are unable to benefit from a traditional school. Additionally, high quality online instruction would be an attractive option for many parents and students even if online learning were not the only way to attend school. Both schools have notable strengths. Parent involvement and responsiveness to parent communication and concerns was noted as a particular strength, especially by parents during parent interviews. Both providers have completed a detailed alignment of their curricula with the Iowa Core. Both providers have policies and procedures to enable families of low income to access virtual schooling. The web portals used by both vendors provided quick feedback to parents, students, and teachers about student progress and achievement.

There are legitimate policy concerns regarding the amount of synchronous instruction that occurs on a daily basis, which may benefit from further research and discussion. Both schools may wish to consider the amount of time allocated to synchronous teaching, in light of student achievement data and available research on effective distance learning practices. The Department may consider issuing rules to address this and other issues specific to online schools. Notwithstanding those issues and concerns, the Department recommends the continued delivery of instruction primarily over the internet.

The Department also makes specific recommendations for each of the virtual schools. These recommendations revolve around matters that are capable of correction, and none of these recommendations would lead to the Department adjusting its recommendation of continued delivery of instruction primarily over the internet.

¹ See, e.g., Rosina Smith, Tom Clark, and Robert Blomeyer, *A Synthesis of New Research in K-12 Online Learning* (2005).

B. Recommendations specific to K12.

- 1) The Clayton Ridge Community School District must continue to assure that all personnel employed by K12 are appropriately licensed for each of the roles that they serve. Department personnel had concerns that unlicensed personnel might be performing administrative functions. The Department recommends that the District take steps to address these concerns, either by obtaining appropriate licensure or by detailed agreements or procedures that would provide that only licensed administrators performed administrative functions.
- 2) While K12 is owned and operated by a private vendor, it is still an attendance center of the District. The Department recommends that the District and the vendor take steps to more fully align the online school with the District as a whole, such as by establishing a framework for developing a joint vision, mission, and goals and by including K12 teachers in required professional development activities.
- 3) The District is encouraged to streamline and formalize the evaluation process for K12 teachers to be inclusive of the Iowa Teaching Standards.
- 4) The District and the vendor should continue to evaluate the effectiveness of K12 programs, such as Gifted-and-Talented, At-Risk, and English-as-a-Second-Language. Evidence was limited regarding implementation fidelity in these programs.

C. Recommendations specific to Connections.

- 1) The District is to ensure that the Career and Technical Education curriculum is available to Connections students. The current plan is to provide transportation to the District; however, for some students, this is not an option due to distance. The District and the provider may collaborate to ensure that Chapter 12's CTE requirement is met, such as by providing a minimum number of those courses entirely online.
- 2) The District is to ensure that its Comprehensive School Improvement Plan addresses the needs of Gifted-and-Talented and At-Risk students who attend Connections.
- 3) The District and the vendor should continue to evaluate the effectiveness of Connections programs, such as Gifted-and-Talented, At-Risk, and English-as-a-

Second-Language. Interviews and evidence indicated a need for more defined program procedures.

VII. CONCLUSIONS

As required by legislation both K12 and Connections have submitted the required and available demographic data to the Department for FY 2013. Additionally, the Department has conducted a survey of a hundred percent of students enrolled in online schools and compiled additional information from other resources to supplement the survey data. The Department has determined that neither K12 nor Connections is a HSAP as defined by Iowa Code section 299.2A. Furthermore, the evidence submitted overwhelmingly supports that K12 and Connections are operating schools with educational instruction and course content delivered primarily over the internet. Notwithstanding the individual recommendations specific to each school, it is the Department's final recommendation, based on a review of the data collected that the continued delivery of instruction primarily over the internet pursuant to Iowa Code section 256.7(33)"c" be allowed.

APPENDIX A
DEMOGRAPHIC & ACHIEVEMENT DATA

Appendix A: Demographic Data

Characteristic	K12	Connections
Enrollment	69	246
Gender		
Male	44	113
Female	25	133
Race and Ethnicity		
White	62	217
African-American	*	11
Hispanic	*	*
Asian	*	*
Native American	*	10
Pacific Islander	*	*
Multiracial	*	*
Other Characteristics		
English Language Learner	*	*
Disability	10	25
Free-Reduced Lunch Eligible	*	*

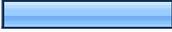
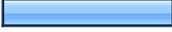
Note: An asterisk (*) indicates that there are fewer than ten students in that particular cell. No data will be publicly reported for those cells, to protect student privacy pursuant to state and federal law.

APPENDIX B
SURVEY DATA

1. Which of the online schools do you go to?

		Response Percent	Response Count
Clayton Ridge (Iowa Virtual Academy)		37.0%	20
CAM (Iowa Connections Academy)		63.0%	34
answered question			54
skipped question			1

2. What grade are you in?

		Response Percent	Response Count
Kindergarten		30.9%	17
1st Grade		18.2%	10
2nd Grade		25.5%	14
3rd Grade		25.5%	14
answered question			55
skipped question			0

3. Do you start school at the same time every day?

		Response Percent	Response Count
Yes		65.5%	36
No		23.6%	13
I don't know		10.9%	6
answered question			55
skipped question			0

4. Do you need to tell your teacher or principal if you will be late or absent from school?

		Response Percent	Response Count
Yes		49.1%	27
No		18.2%	10
I don't know		32.7%	18
answered question			55
skipped question			0

5. How long are your classes?

		Response Percent	Response Count
Less than 30 minutes each		1.8%	1
About 30 minutes each		29.1%	16
About an hour each		41.8%	23
More than an hour each		7.3%	4
I don't know		20.0%	11
answered question			55
skipped question			0

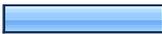
6. How many classes do you have each day?

		Response Percent	Response Count
1		3.6%	2
2		1.8%	1
3		0.0%	0
4		10.9%	6
5		36.4%	20
6		18.2%	10
7		12.7%	7
8		5.5%	3
More than 8		1.8%	1
I don't know		9.1%	5
answered question			55
skipped question			0

7. Do you finish school at the same time every day?

		Response Percent	Response Count
Yes		41.8%	23
No		50.9%	28
I don't know		7.3%	4
answered question			55
skipped question			0

8. How long is your school day?

		Response Percent	Response Count
Less than 4 hours (less than half a day)		7.3%	4
4 hours or more (half a day or more)		69.1%	38
I don't know		23.6%	13
answered question			55
skipped question			0

9. If you were bullied by someone on your computer or phone, would you know how to report it to your school?

		Response Percent	Response Count
Yes		58.5%	31
No		41.5%	22
answered question			53
skipped question			2

10. Who usually teaches you during school? Check all of the answers that are right for you.

		Response Percent	Response Count
My teacher		34.5%	19
My mom or dad		94.5%	52
Another adult in my family		1.8%	1
Someone else		1.8%	1
I don't know		1.8%	1
answered question			55
skipped question			0

11. During your classes, does your teacher spend time talking to you and showing you how to do the things you are learning?

		Response Percent	Response Count
Yes		87.3%	48
No		9.1%	5
I don't know		3.6%	2
answered question			55
skipped question			0

12. Do you work in groups with other students during or outside class?

		Response Percent	Response Count
Yes		65.5%	36
No		23.6%	13
I don't know		10.9%	6
answered question			55
skipped question			0

13. Do you have time to work on your own during any of your classes?

		Response Percent	Response Count
Yes		72.7%	40
No		20.0%	11
I don't know		7.3%	4
answered question			55
skipped question			0

14. Is there time to study during any of your classes?

		Response Percent	Response Count
Yes		72.7%	40
No		12.7%	7
I don't know		14.5%	8
answered question			55
skipped question			0

15. Are you called on to answer questions during your classes?

		Response Percent	Response Count
Yes		90.9%	50
No		5.5%	3
I don't know		3.6%	2
answered question			55
skipped question			0

16. Can you ask questions during your classes?

		Response Percent	Response Count
Yes		89.1%	49
No		7.3%	4
I don't know		3.6%	2
answered question			55
skipped question			0

17. Do you know how well you are doing in your classes?

		Response Percent	Response Count
Yes		76.4%	42
No		10.9%	6
I don't know		12.7%	7
answered question			55
skipped question			0

18. If you need help with your work, who do you ask? Check all of the answers that are right for you.

		Response Percent	Response Count
My teacher		27.3%	15
My mom or dad		96.4%	53
Another adult in my family		5.5%	3
Someone else		5.5%	3
I don't know who to ask for help		0.0%	0
answered question			55
skipped question			0

19. Do you know what your teacher expects you to learn in your classes?

		Response Percent	Response Count
Yes		83.3%	45
No		16.7%	9
answered question			54
skipped question			1

1. Which of the online schools do you go to?

		Response Percent	Response Count
Clayton Ridge (Iowa Virtual Academy)		15.7%	11
CAM (Iowa Connections Academy)		84.3%	59
answered question			70
skipped question			10

2. What grade are you in?

		Response Percent	Response Count
4th grade		10.0%	8
5th grade		10.0%	8
6th grade		16.3%	13
7th grade		5.0%	4
8th grade		12.5%	10
9th grade		27.5%	22
10th grade		10.0%	8
11th grade		3.8%	3
12th grade		5.0%	4
answered question			80
skipped question			0

3. Do you start school at the same time every day?

		Response Percent	Response Count
Yes		42.7%	32
No		56.0%	42
I don't know		1.3%	1
answered question			75
skipped question			5

4. Do you need to tell your teacher or principal if you will be late or absent from school?

		Response Percent	Response Count
Yes		67.6%	50
No		31.1%	23
I don't know		1.4%	1
answered question			74
skipped question			6

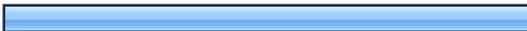
5. How long are your classes?

		Response Percent	Response Count
Less than 30 minutes each		0.0%	0
About 30 minutes each		4.1%	3
About an hour each		60.8%	45
More than an hour each		23.0%	17
I don't know		12.2%	9
answered question			74
skipped question			6

6. How many classes do you have each day?

		Response Percent	Response Count
1		0.0%	0
2		0.0%	0
3		0.0%	0
4		6.8%	5
5		35.1%	26
6		36.5%	27
7		14.9%	11
8		4.1%	3
More than 8		0.0%	0
I don't know		2.7%	2
answered question			74
skipped question			6

7. Do you finish school at the same time every day?

		Response Percent	Response Count
Yes		17.3%	13
No		80.0%	60
I don't know		2.7%	2
answered question			75
skipped question			5

8. How long is your school day?

		Response Percent	Response Count
Less than 4 hours (less than half a day)		1.4%	1
4 hours or more (half a day or more)		97.3%	72
I don't know		1.4%	1
answered question			74
skipped question			6

9. If you were bullied by someone on your computer or phone, would you know how to report it to your school?

		Response Percent	Response Count
Yes		90.7%	68
No		9.3%	7
answered question			75
skipped question			5

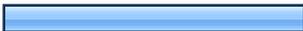
10. Who usually teaches you during school? Check all of the answers that are right for you.

		Response Percent	Response Count
My teacher		69.3%	52
My mom or dad		86.7%	65
Another adult in my family		13.3%	10
Someone else		8.0%	6
I don't know		0.0%	0
answered question			75
skipped question			5

11. During your classes, does your teacher spend time talking to you and showing you how to do the things you are learning?

		Response Percent	Response Count
Yes		81.1%	60
No		14.9%	11
I don't know		4.1%	3
answered question			74
skipped question			6

12. Do you work in groups with other students during or outside class?

		Response Percent	Response Count
Yes		52.0%	39
No		45.3%	34
I don't know		2.7%	2
answered question			75
skipped question			5

13. Do you have time to work on your own during any of your classes?

		Response Percent	Response Count
Yes		96.0%	72
No		2.7%	2
I don't know		1.3%	1
answered question			75
skipped question			5

14. Is there time to study during any of your classes?

		Response Percent	Response Count
Yes		83.8%	62
No		12.2%	9
I don't know		4.1%	3
answered question			74
skipped question			6

15. Are you called on to answer questions during your classes?

		Response Percent	Response Count
Yes		67.6%	50
No		23.0%	17
I don't know		9.5%	7
answered question			74
skipped question			6

16. Can you ask questions during your classes?

		Response Percent	Response Count
Yes		98.7%	74
No		0.0%	0
I don't know		1.3%	1
answered question			75
skipped question			5

17. Do you know how well you are doing in your classes?

		Response Percent	Response Count
Yes		94.7%	71
No		1.3%	1
I don't know		4.0%	3
answered question			75
skipped question			5

18. If you need help with your work, who do you ask? Check all of the answers that are right for you.

		Response Percent	Response Count
My teacher		85.1%	63
My mom or dad		95.9%	71
Another adult in my family		21.6%	16
Someone else		17.6%	13
I don't know who to ask for help		0.0%	0
answered question			74
skipped question			6

19. Do you know what your teacher expects you to learn in your classes?

		Response Percent	Response Count
Yes		98.6%	73
No		1.4%	1
answered question			74
skipped question			6

APPENDIX C
HSAP QUESTIONS MATRIX

HSAP Questions Matrix

Questions used to determine whether the parent or the teacher is driving the instruction.	Clayton Ridge	CAM
Who is selecting the curriculum?	The principal, teachers, and parents reported the curriculum is selected by K12 Inc. In addition, documents provided by the district supported this information.	The principal, teachers, and parents reported the curriculum is selected by Iowa Connections Academy. In addition, documents provided by the district supported this information.
What is the curriculum? Iowa Core?	Administrators and teachers indicated the curriculum used by K12 Inc. is aligned with the Iowa Core. Site visit team members observed the alignment demonstrated by the content standards in the student system.	Administrators and teachers indicated the curriculum used by Iowa Connections Academy is aligned with the Iowa Core. Site visit team members observed the alignment demonstrated by the content standards in the student system.
Is the curriculum required?	Administrators and teachers reported the curriculum provided is required. Parents reported all curriculum is provided by K12 Inc.	Administrators and teachers reported the curriculum provided is required. Parents reported all curriculum is provided by Iowa Connections Academy.
Who chooses the textbooks or online materials?	Parents reported all materials are chosen and provided K12 Inc.	Parents reported all materials are chosen and provided by Iowa Connection Academy.
Who devises the lesson plans?	Administrators, teachers, and parents reported lessons are designed K12 Inc.	Administrators, teachers, and parents reported lessons are designed by Iowa Connections academy.
Who is teaching as defined in Iowa Admin. Code r. 281-12.4(8)?	The K12 teachers are delivering the content, monitoring student progress, correcting the work, and providing feedback to the student and the parents. The parents assist and supervise the child during their learning time but do not take part in content delivery.	Teachers and parents reported Iowa Connection Academy teachers are instructing the student. Documentation provided showed contact logs and student progress.

HSAP Questions Matrix

<p>Is instruction by a licensed teacher who has endorsements in the subject matter taught?</p>	<p>Evidence provided on site and available via the Board of Educational Examiners indicates all teachers are Iowa certified for the subjects they teach.</p>	<p>Evidence provided on site and available via the Board of Educational Examiners indicates all teachers are Iowa certified for the subjects they teach.</p>
<p>How much contact is the parent having with the student? Daily, weekly, monthly? What is the nature of the contact? Supportive? Instructive?</p>	<p>Parents indicated during the interview process they have daily contact with the student. This contact is supportive in nature.</p>	<p>Parents indicated during the interview process they have daily contact with the student. This contact is supportive in nature.</p>
<p>How much contact is the teacher having with the student? Daily, weekly, monthly? What is the nature of the contact? Supportive? Instructive?</p>	<p>Parent, student, and teacher interviews indicated the teacher has at the very least weekly contact with the student. Although the student does have daily content with the online curriculum provided by K12 Inc. The teachers provide at least one live lesson per topic, per week. In addition the teachers interact with the student via the phone as needed. Teacher/Student contact is both instructive and supportive.</p>	<p>Parent, student, and teacher interviews indicated the teacher has at the very least weekly contact with the student. Although the student does have daily content with the online curriculum provided by Iowa Connections Academy. The teachers provide at least one live lesson per topic, per week. In addition the teachers interact with the student via the phone as needed. Teacher/Student contact is both instructive and supportive.</p>
<p>How much contact is the teacher having with the parent? What is the nature of this contact? Supportive? Instructive?</p>	<p>Interviews with the parents indicated the teacher is in contact with the parents as much as is needed. The contact is supportive in nature.</p>	<p>Interviews with the parents indicated the teacher is in contact with the parents as much as is needed. For example, one parent reported questions were always responded to in 24 hours. The contact is supportive in nature.</p>
<p>How often is the child interacting with the curriculum?</p>	<p>Most students at K12 Inc. are having daily, direct interactions with the</p>	<p>Most students at Iowa Connections Academy are having daily, direct</p>

HSAP Questions Matrix

	curriculum.	interactions with the curriculum.
Who monitors the child's progress?	Interviewees reported daily progress information is available to both parents and students provided by K12 Inc. teachers. Site visit team was able to see the teacher's ability to monitor student progress via the student management system.	Interviewees reported daily progress information is available to both parents and students provided by Iowa Connections Academy teachers. Site visit team was able to see the teacher's ability to monitor student progress via the student management system.
Does the teacher provide feedback to the student or parent or both?	Interviewees indicated feedback regarding student progress is shared with both student and parent.	Interviewees indicated feedback regarding student progress is shared with both student and parent. On site evidence indicated the parent can access student progress every time they log on to the system.
Is the child required to have regular assessments, including participation in district wide assessments?	Evidence was provided of the administration of the Iowa Assessments scheduled in the Spring of 2013. In addition, other assessments are administered via the online system.	Evidence was provided of the administration of the Iowa Assessments which occurred during the month of November. In addition, other assessments are administered via the online system.
Is attendance monitored and who monitors attendance?	Interviews and documents indicated that the parents of K12 Inc. students are also responsible for recording attendance of the child. This is done on an honor system but can be monitored by the child's academic progress.	Interviews and documents indicated attendance is monitored by the parents through an honor system. The school expectation is 6 hours per day and they have a system of tracking and have instituted a warning system for students who are not maintaining the required level of attendance.

APPENDIX D
IOWA DEPARTMENT OF EDUCATION
ONLINE SCHOOLS MATRIX
(Aug. 2012)

ONLINE SCHOOLS

During accreditation site visits to a district that offers an online school, all of the following must be met.

Accreditation Requirements of Regular Education Program	Evidence required to Meet
<p>School calendar must identify specific days for student instruction, staff development and in-service time, and time for parent-teacher conferences. 281—Iowa Administrative Code (IAC) 12.1(7)</p>	<p>School calendar; interviews of staff and students</p>
<p>“Day of school” is a day during which the district is in session and students are “under the guidance and instruction of the instructional professional staff.” 281—IAC 12.1(8)</p>	<p>School calendar; interviews of staff and students</p>
<p>Minimum school day is 5.5 hours of instructional time, grades 1-12. 281—IAC 12.1(9)</p>	<p>School board policy and daily schedule; interviews of staff and students</p>
<p>“Day of attendance” is “a day during which students were present and under the guidance and instruction of the instructional professional staff.” 281—IAC 12.1(10)</p>	<p>District’s attendance records</p>
<p>“Educational program” must be adopted by board and is “the entire offering of the school, including out-of-class activities and the sequence of curriculum areas and activities.” 281—IAC 12.2</p>	<p>School board must be aware of the curriculum, and approve the same as demonstrated by board policy</p>
<p>Student records, both cumulative and permanent, must be maintained by the board in accordance with the requirements of 281—IAC 12.3(4).</p>	<p>Presence of such files for all students</p>
<p>Board policies regarding students must include the following: attendance, use of tobacco, use/possession of alcohol or controlled substances, harassment, disruptive behavior, weapons, physical restraint, suspension/expulsion, out-of-school behavior, participation in extracurricular activities, academic progress, and citizenship. 281—IAC 12.3(6)</p>	<p>Board policies must reflect that the board understands that its policies apply to all students, and must reflect how the policies apply to all students. I.e., the policies must reference students who take curricula via online courses.</p>

<p>“Teacher” is defined “as a member of the instructional professional staff who holds a license/certificate endorsed for the type of position in which employed. A teacher diagnoses, prescribes, evaluates, and directs student learnings in terms of the school’s objectives, either singly or in concert with other professional staff members; shares responsibility with the total professional staff for developing educational procedures and student activities to be used in achieving the school’s objectives; supervises educational aides who assist in serving students for whom the teacher is responsible; and evaluates or assesses student progress during and following instruction in terms of the objectives sought, and uses this information to develop further educational procedures.” 281—IAC 12.4(8)</p>	<p>Iowa Board of Educational Examiners records must show that all instructors are licensed in Iowa appropriate to grade level and subject area taught</p>
<p>The minimum program as set forth in chapter 12 must be offered and taught.</p>	<p>All students must have access to all programming offered by the high school.</p>
<p>The district shall incorporate gifted and talented programming into its CSIP, shall identify all such students and provide for their needs in a qualitatively differentiated program. 281—IAC 12.5(12)</p>	<p>CSIP (Comprehensive School Improvement Plan) must show that all eligible students are properly identified and offered the district’s G/T programming.</p>
<p>The district shall include in its CSIP provisions for meeting the needs of at-risk students. 281—IAC 12.5(13)</p>	<p>See above.</p>
<p>Teachers must be included in the district’s plan for professional staff development as incorporated in its CSIP. 281—IAC 12.7</p>	<p>There must be a plan for professional growth that actively includes the online teachers in the attendance center plan also.</p>
<p>Each school district and accredited nonpublic school in Iowa is required to meet annual reporting requirements (APR). Meeting this requirement includes submitting data/information to the Department and distributing all required reporting data/information to the local community. 281—IAC 12.8(3)</p>	<p>Annual Progress Report (APR) communicated/disseminated to the school district’s or accredited nonpublic school’s local community.</p>

<p>Non-Accreditation Requirements of Regular Education Program</p>	<p>Evidence Required to Meet</p>
<p>The provisions for education of the homeless apply to any program operated by a district. 281—IAC chapter 33.</p>	<p>Evidence that access is not denied to a student who is homeless.</p>

<p>The provisions of programs for students with limited proficiency in the English language fully apply for any child enrolled as a regular student in the district. 281—IAC chapter 60.</p>	<p>Evidence that access is not denied to an ELL student, and that such student receives appropriate services.</p>
<p>All provisions of NCLB fully apply for any child enrolled as a regular student in the district. P.L. 107-110.</p>	<p>The teachers must be “Highly Qualified” and the students must be assessed with all other high school students in the district.</p>
<p>Board must have a policy regarding how attendance will be monitored, defining truancy in the context of the virtual school program, and rules for punishing a truant student. Iowa Code § 299.9</p>	<p>Board policy; interviews of staff and students</p>
<p>Board must have policies defining adequate school staffing and assignment of school personnel. Iowa Code § 280.14</p>	<p>Board policy</p>
<p>Teachers – if new to the district – are subject to the mentoring and induction provisions of Iowa Code chapter 284</p>	<p>Any teacher of the online curriculum who is a new hire with the district must take part in mentoring and induction program.</p>
<p>Board must have a policy regarding how it will report to law enforcement students who violate its policies against possession of weapons, tobacco, drugs, and/or alcohol at school. Iowa Code § 280.24</p>	<p>Board policy</p>
<p>These students are subject to FERPA; therefore, District must send the annual notice of “directory information” to each family. 20 U.S.C. § 1232g</p>	<p>Evidence that notification was sent to all such families.</p>
<p>Secondary students must have all Senior Year Plus programming available to them to same extent such programming is available to all secondary students in the District. Iowa Code chapter 261E</p>	<p>Evidence that the notification went to all students.</p>
<p>Secondary students must be given the opportunity at least 2x/year to register to vote. Iowa Code § 280.9A; 48A.23</p>	<p>Evidence that notification went to all students.</p>
<p>All provisions of IDEA fully apply to students who are students with a disability. 20 U.S.C. § 1400 et seq.</p>	<p>All students with disabilities must be identified and given access to the program.</p>
<p>Telecommunications may be employed as a means to deliver any course, including a course required for accreditation by the department, <u>provided it is not the exclusive means of instructional delivery.</u> 281—15.4(256)</p>	<p>This does not mean that there may be one section of physics (e.g.) offered traditionally and one section offered exclusively online. The section offered online must have components of all courses offered taught “on the ground.”</p>