

**COLORADO AVERAGE DAILY MEMBERSHIP STUDY:  
A Feasibility Study of Alternatives to the  
October 1 Student Count Method**

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**Prepared for the Colorado Department of Education by**

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## I. Introduction

This report summarizes the work done by Augenblick, Palaich and Associates (APA), for the Colorado Department of Education (CDE) on the Colorado ADM study. APA worked with the Colorado School Finance Project and the Center for Education Policy Analysis at the University of Colorado Denver in completing the work. During the 2010 legislative session the Colorado General Assembly enacted Senate Bill 10-008 calling for a feasibility study of implementing a new student count method for school district funding based on Average Daily Membership (ADM). The state currently funds districts on the basis of a single count date, October 1, based on the number of students in *attendance* at school that day.<sup>1</sup> Under an ADM funding count, districts would receive funding based on the number of students enrolled, or in *membership* in the district, on average over a specific number of days (based on a review of practices in other states using ADM, the count period may range from as few as 20 days to the entire school year).

The primary rationale for exploring an ADM-based student count is to provide districts with a financial incentive to maintain students' enrollment after the October 1 count has been completed and to more accurately adjust, or target, resources to districts based on the students they serve throughout the course of the school year. Under the current single count method used in Colorado, districts are initially funded based on projections in the spring prior to a school year. Then the final funding counts for the entire school year are revised on the basis of the number of students enrolled and attending on October 1, whether or not students withdraw from enrollment in the district after the count has been completed. The state reconciles funding from the projection counts to the final October 1 counts. Districts also receive no additional funding for students who enroll after the October 1 count day. Colorado has on statute a February military count date that is intended to adjust for the enrollment of children of military families occurring after October 1, but the state has provided funding for this adjustment in only one school year thus far.. Colorado also has a legislative supplemental process in which increased enrollments can be accounted for and funding increased for school districts in January of each year, but again this process has not been funded in recent years.

The importance of school attendance has received renewed attention in recent years and research has shown the many advantages of regular attendance in school. Studies show that students with poor school attendance as early as kindergarten are more likely to experience lower student achievement throughout their elementary school career. Chronic absence as early as 6<sup>th</sup> grade is a key indicator of dropping out of school, while poor attendance in 9<sup>th</sup> grade is one of the strongest predictors of dropping out.<sup>2</sup> In short, students with poor attendance are more likely to perform poorly on course work and state tests and to drop out of school. In turn, school dropouts are more likely to experience unemployment, realize lower lifetime earnings and face other socioeconomic challenges as adults. These consequences may lead to a variety of indirect costs for the state over time.

It was originally anticipated that the Request for Proposals (RFP) for the ADM count study would be issued by July 1, 2010 with the final report due to the Colorado Department of Education (CDE) by December 15, 2010. However, because it required more time than anticipated to raise private funds to pay for the study, the RFP was not issued by the CDE until mid-October and the contract was not

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<sup>1</sup> Although the primary count date is October 1, there is a window of time in which an eligible student may be counted if he/she is absent on October 1.

<sup>2</sup> Attendance Works, accessed at <http://www.attendanceworks.org/why-it-matters/>.

awarded until November 12<sup>th</sup>. Even though the issue date was delayed by several months, the due date for the final report was pushed back only to January 7<sup>th</sup>, 2011 to ensure that any recommendations emerging from the study would be available in time for consideration by the General Assembly during the 2011 session.

The scope of work called for under the RFP included the following components:

- Research into the potential incentives of count dates on school enrollment and attendance;
- The advantages and disadvantages of the various student count methods;
- The policies of other states regarding their count dates;
- A cost analysis of data systems required to implement an alternative count method;
- The timelines and process for implementing an alternative count method; and
- The financial effects of an alternative count method on school districts.

The legislation also established an advisory committee made up of legislators, state administrators, State Board members, and representatives of school district administrators, local school boards, and Colorado-based policy research and advocacy groups. The role of the advisory committee was to provide guidance and input to the study process.

Upon being awarded the contract for the study, the consultants developed a study plan that included the following tasks:

- A review of the literature pertaining to count methods and student enrollment and attendance;
- A review of the count methodology employed in each of the 50 states;
- Phone interviews with four states that are using or have used ADM;
- On-site and telephone interviews with six Colorado school districts and two charter schools about the process and resources required for conducting the current October 1 count and thoughts about adopting an alternative ADM count method;
- A meeting with six school district chief financial officers (CFO) to gain their thoughts and insights into the current and potential alternative count methods;
- An online survey that was administered to every school district superintendent and CFO in Colorado for collecting information similar to that obtained through our interviews from a broader representation of districts;
- An analysis of enrollment, attendance and student transfer data obtained from the CDE for developing an estimate of district ADM counts and for conducting a simulation of the financial impact on districts of adopting an ADM count method for funding; and
- Scheduling and staffing three advisory committee meetings.

The remainder of this report is broken out into the following seven sections:

- Literature Review;
- Student Count Policies Other States;
- District Input;
- Data Analysis;
- Advisory Committee Work;
- Principles and Alternatives; and
- Recommendations

## II. Literature Review of Research on ADM/ADA and Attendance

While it may seem intuitive that allocating funding to school districts using an ADA<sup>3</sup> (average daily attendance), or even an ADM count, would provide districts with a financial incentive to maximize student attendance, we were unable to find any empirical evidence to support this assertion. We conducted a search of both practitioner and academic publications but were unable to find any studies showing a relationship between student count methods for funding purposes and attendance or academic improvement. This is not to say there is no relationship, but only that there appears to be no empirical research into the matter.

It is not entirely surprising that there is little or no research on this issue. States change their counting methods fairly rarely, and when they do it is more likely to be a refinement of the current count method rather than a wholesale abandonment of one method for another. One of our study states, South Dakota, did change from an ADM count to a single count day method in 2008. Unfortunately, only one year of attendance rate data is available at this time, and not surprisingly this shows no difference in the state average attendance rate after one year under the new count method. In fact, the state's attendance rate has hovered between 95.2% and 95.7% since the 1999-2000 school year. However, tracking South Dakota's experience over the next few years may provide an opportunity for empirically evaluating the effects of different student count methods on student attendance.

Also making state-level research into this relationship difficult is the complex interaction of related state and local policies, demographic changes, and other factors that may influence attendance. For example, a state may change its student counting method while at the same time other policies influencing attendance were adopted, such as grant funding for supporting improved attendance and truancy programs or linking attendance to school accountability or accreditation systems. Other state policies that may influence attendance and improved student outcomes are mandatory universal full-day kindergarten and preschool. Similarly, student demographics may change over time that impact attendance, such as increased poverty and mobility. It may be difficult if not impossible to tease out the effect of any one of these factors influencing attendance rates.

That said, some anecdotal evidence seems to support the contention that districts will work harder to keep students in school when their funding is more directly influenced by attendance. An issue paper by the economic consulting firm ECONorth on the feasibility of using ADA for distributing revenues to districts, notes the lack of financial incentives for improving attendance in most state funding formulas and provides examples from Texas and Kentucky (both states that fund schools on the basis of ADA) of districts educating staff, parents and students about the costs of missing school (at the time \$32.29 per student per day in the Texas district and \$20.73 in Kentucky) in an effort to encourage better attendance.<sup>4</sup>

When California's Oakland Unified School District experienced severe financial difficulties in the early 2000's, the financial recovery plan developed by the state-appointed administrator, Randolph Ward, included improving attendance as a key strategy for increasing district funding (California also uses an

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<sup>3</sup> Under the ADA count method, students must not only be enrolled but also in attendance in school to generate funding.

<sup>4</sup> ECONorth. (2005). *Issue Paper: Using Average Daily Attendance as a Basis for Distributing State School Revenue*. Portland, OR: Author.

ADA count). Strategies implemented by the district for improving attendance included personal phone calls to the parents of absent students (as opposed to the automated calls used previously), a partnership with the Alameda County District Attorney's office to intervene with, and even fine, the parents of habitually truant students, and expanding the district's small schools initiative.<sup>5</sup>

A recent article in *Principal Leadership* told of another Texas district that increased its funding by more than \$1 million during the 2007-08 school year by tightening the attendance reporting requirements of its schools, analyzing data on absences to track which students were missing school and in which schools, and undergoing a voluntary audit to evaluate and improve its student attendance data systems.<sup>6</sup>

While none of these examples demonstrate a statistical relationship between state-adopted count methods and improved attendance, they do provide some anecdotal evidence that districts will respond to the financial incentives introduced by student count methods that rely in whole or part on student attendance, particularly in these difficult financial times.

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<sup>5</sup> Lapan, Tovin. (2003, October). *Oakland Schools Chief Takes Aim at Attendance*. Berkeley, CA: North Gate News Online, UC Berkeley Graduate School of Journalism.

<sup>6</sup> Joubert-Guillory, J. (2009). School Attendance and the District Budget. *Principal Leadership*, 9(9), 6-7..

### III. Student Count Policies in Other States

Appendix A includes a table that provides information on the student count used in each of the 50 states for school funding purposes. The table focuses on two main components of any count: (1) if the state uses attendance or membership and (2) the frequency of the student count. We relied on two main sources to create this table. One was a description of all 50 states' current school funding systems compiled by Deborah Verstegen and housed at the University of Nevada - Las Vegas<sup>7</sup>. The other source was the Colorado Children's Campaign's report on state student counts<sup>8</sup>. We also placed calls to the departments of education in a small number of states to clarify or update information on their student count policies.

The third column of the table shows the type of count in each state. As we describe the different characteristics of the counts, it will become clear that even similarly named counts can be implemented in different ways.

When states decide what students to fund they must also decide between counting students in attendance on a certain day or days, or counting students in membership (students enrolled with the district regardless of whether they are in attendance at a given time). Attendance focuses on students actually in seats on a particular day, or who can be proved to have been in attendance over some period of time. This type of count links funding to the number of students that are being "served" in the classroom at a point in time or over a period of time. Membership on the other hand, is based on the number of students a district is responsible to serve; that is, funds are allocated based on the number of students a district would have to serve if all enrolled students were in attendance on a given day.

Our work found that currently only about a quarter of the states use attendance as part of the main student count for school funding purposes. Membership is used by the other three quarters of the states. Though most states use just one type of count, Arizona uses student membership for the main part of the student count but adjusts the count for districts that have lower than average attendance rates over the course of the year. It is important to note that Arizona is going away from this type of student count next year. The reason for the switch will be discussed in the state interview section below.

Regardless of the type of count, states must also decide how often they will count students. States may use a single day count, multiple count dates or an average over a period of time. Our research shows about one fifth of the states use a single count date. States apply this single count date differently. Colorado, which looks at attendance, has a single count on October 1<sup>st</sup> but allows districts to prove attendance for a window beyond this single count date. Other states truly use a single day count, but in

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<sup>7</sup> Verstegen, D., Jordan, T. S. and Amador, P. (2008). *A 50 State Survey of School Finance Policies*. Accessed at <http://education.unlv.edu/centers/ceps/study/>

<sup>8</sup> Groginski, S. (2010). *Student Enrollment Count Mechanisms for School Funding: A Survey of State Policies*. Denver, CO: Colorado Children's Campaign.

some cases these states may be relying on a membership count instead of an attendance count. A similar number of states use multiple count dates, California is one state that uses multiple count dates looking at attendance. Multiple count states have to determine the number of count dates and when the counts will be held, and these parameters differ by state. About 60% of the states use an “Average Daily” count. This involves averaging the counts of either attendance or membership over a large number of days. States can differ dramatically on the number of days included in the average. Some states use a count for each day of school but others use a shorter period of time such as the first 40 or 100 days of school.

The combination of the type of student count and the frequency helps to define each state’s student count system. Appendix A shows the type of count and frequency of count for each state. There are basically six possible types of student funding counts states can use:

- Single Day Membership
- Single Day Attendance
- Multiple Day Membership
- Multiple Day Attendance
- Average Daily Membership
- Average Daily Attendance

Once a count is determined, states apply it to funding parameters to determine state school funding. Once again, the application of the count can differ across states. A number of key factors go into the application. Current year or prior year counts may be used, and adjustments to funding may be made during the year based on changes in count over time. We did not collect information on how each state applies its student count to district funding, but did get information on this from the four states we interviewed. How these states apply the count will be discussed below. It appears that states that use an “Average Daily” count often use a prior year for funding purposes. That is, they fund for the current school year based on a previous year student count. States using a single count may be more likely to use the current year count to fund the current school year.

## State Interviews

After reviewing the student count information for all 50 states, we selected four states to interview further. The four states all currently used, or have recently used, Average Daily Membership (ADM) for school funding purposes. Arizona was selected because it currently uses ADM as the basis of funding but adjusts for attendance rate; the state has also made the decision to move away from this model in the coming year. Minnesota was selected because it has a long history of using ADM and is known to have a well defined ADM system. Nebraska was selected because it combines the use of ADM and a single count for funding purposes. South Dakota was selected because the state recently made a policy decision to switch from using ADM to using a single day count.



We will first describe the interviews we had with each state. This will include a fuller description of the state's current student count. It will also include information based on responses to our questions that can be seen in Appendix B. Following the description of each interview, we will discuss the key issues that surfaced.

## *Arizona*

Arizona currently uses an ADM student count for funding purposes. The count is based on the first 100 days of a district's school year, the state does not use a specific 100 days for each district, but instead counts over the first 100 days starting with the district's first day of school. Funding for the current school year is based on the 100 day ADM count from the previous school year for school districts. Funding for charter schools is based on current year counts. The state funds all districts and charters on a monthly basis allowing for funding adjustments to charters. The state does make in-year adjustments for districts with growing enrollments. The ADM count is also adjusted down for districts that do not have at least the statewide average daily attendance rate. A district with a rate below the statewide average has its ADM count reduced by the percent its average daily attendance rate is below the statewide average daily attendance rate. This system has been used for a number of years but will be changed for the coming school year.

In the coming year, the state will go from the 100 day ADM count to four in-year counts held on September 15<sup>th</sup>, November 15<sup>th</sup>, January 15<sup>th</sup> and March 15<sup>th</sup> plus a final end-of-year count. Again, funding for districts will be based on the previous year's count while funding for charters will be based on current year counts. The state made the switch for a couple of reasons. First, districts felt the adjustment for attendance was unfair. It was expressed that districts did not believe they had enough control over this variable for it to so greatly impact their funding. The state will also realize some benefits by reducing the current burden on the state's student information system. It was expressed that the system is a bit antiquated and the ADM count, with the daily information from all districts, created a heavy burden on the system. Partly this has become an issue as more data is being collected in other areas. Another possible reason for the change is that by tracking students further into the year, districts may have a greater incentive to keep students enrolled. It was expressed that there is currently a drop off of membership around November and the current 100 day system does not look beyond that time period. The new system will track student counts throughout the year.

The interviewee felt the change in the system would not really change the current personnel burden for the state. The state has six to seven people in the finance unit that spend time with the ADM count and will spend time with the new multiple count system as well. They perform a number of tasks including providing technical support to districts on how to manage the count. The state also runs checks on student information to check for students counted by multiple districts. When this occurs, the state simply reduces the total FTE (full-time-equivalent) reported in the system to a single FTE and proportionally funds each district for its portion of that student. For example, if a student shows up as a 1.0 FTE in district A and a .5 in district B, then district A will receive .67 FTE for the student and district B will receive .33 FTE. The state does not require documentation at the time of data submission to verify that students are actually enrolled in a district nor does it audit all districts on the count each year.

Instead, the state relies on the district annual financial audits to ensure that proper student count procedures are being followed. This district audit is paid for by the state. The state also conducts a small number of targeted audits each year.

Because the state funds students based on their FTE enrollment calculated to the nearest quarter (for example, a student may be .25, .50, .75 or 1.0 FTE) and based on the number of classes enrolled in or hours per day attending school, districts must submit school calendars showing their total minutes of instruction and class schedules. Students are dropped from enrollment when they reach 10 consecutive days of unexcused absences.

The interviewee mentioned that having a strong data system is extremely important to having a smooth and accurate system. Making sure vendors are compatible with a state system and that the data is being collected as efficiently as possible are key.

## *Minnesota*

Minnesota has used an ADM system for more than two decades. The student count system starts with each school district giving the state an estimate of ADM for the coming school year. This count is then used to provide districts with bi-monthly payments throughout the school year. The state currently gives districts 80% of the projected funding based on the projected ADM throughout the school year. Districts report the ADM data twice a year. Once final ADM numbers are available at the end of the school year, districts receive adjusted payments in August, September, and October to complete the funding for the year. (This is when the other 20% of funding is allocated to districts.) For charter schools' first three years of funding, the October count for the current school year is used instead of the projected ADM count. This allows charters to better understand membership patterns before being funded on the projections.

Minnesota has a clear definition of when a student should be removed from membership for cases where it is not an obvious removal such as a transfer. The state defines a student as no longer being in membership when they have 15 consecutive unexcused absences in a row. At that point the student must be removed from the district rolls on the date of their last attendance. Minnesota does not set any minimum number of instructional hours that students must be provided for any grade level. They do require districts to have at least as many school days as they had in 1996.

Minnesota's student information system used for student count reporting, MARSS, has been in place since the current process for counting students was initiated. The state's Department of Education indicated that due to careful planning at the time the system was developed, the system has successfully accommodated new service models, such as school choice, and additional data reporting requirements. The state certifies vendors providing student information systems to districts and charters to ensure compatibility with the MARSS system.

The staff in charge of the student count includes two nearly full-time personnel at the state along with smaller portions of time for two programmers. The two nearly full-time employees conduct most of the

training on the count process around the state. The personnel spend between a few days and a few weeks doing the training. The state is required to audit 25 school districts per year and has one auditor on staff. Like Arizona, the state does not require documentation from districts to verify students' enrollment at the time data are submitted. The state does conduct edits to identify students who are over-counted by multiple districts. When over-counting is discovered the state notifies the districts involved and places the responsibility for properly allocating the student's time on those districts.

## *Nebraska*

Nebraska uses both a single day count and an average daily count for funding purposes. Both counts are based on district membership. Funding for districts is projected based on the prior year's single day count, held on the last Friday in September. The funding is then adjusted based on districts' actual ADM for that prior year. The funding is first set in February of the prior school year. For example, for the 2010-11 school year, funding would be set in February of 2010 based on the single day count from September of 2009. Then the funding is adjusted based on the 2009-10 school year actual ADM in February of 2011. Districts know the actual ADM counts in August of the school year but since the whole school finance system is rerun, districts cannot necessarily predict the impact of ADM counts on their funding.

Nebraska rules allow districts to define when a student comes into membership. The assumption is that districts will try to enroll students as soon as possible. Students are considered no longer in membership if they have 20 consecutive days of unexcused absences. Then a student must be taken off the district rolls based on the date they last attended school. Students are tracked using the Nebraska Student and Staff tracking system. The system allows the state to identify students who are counted in more than one district. The state helps districts resolve where the students actually should be counted for funding purposes.

The state uses members of its data services team to help facilitate the counts. The department spends part of its time on the count but also take care of other data needs for the department. Four trainers located throughout the state help train district personnel on how to appropriately count students. The state relies on the district financial audits to audit districts' student count procedures.

## *South Dakota*

South Dakota uses a single day membership count as the basis for school funding. The count is held on the last Friday of September each year. The state uses prior year counts for funding purposes. This system is a recent switch for the state which had used an ADM count up until a few years ago. The switch was made at least partially to allow the state legislature to have more accurate budget data by no longer requiring policymakers to wait for year-end ADM counts to finalize funding for the following year. In making the switch, the state examined the year-long trends in membership and found very little change in overall state membership from the beginning of the school year until the end of the year.

The state defines a student as being out of enrollment in a district after 15 consecutive days of unexcused absences. The state does not finalize the single day count until 15 days beyond the last

Friday of September to ensure that districts can take any students falling into this category off of membership roles before the count is turned into the state. The count is facilitated by the statewide student information system. South Dakota worked with Infinite Campus (one proprietary software many districts use as their student information system) a few years ago to create a student information system that included all of the data the state department wanted to collect. This module is given to each district free of charge to use and allows the state to pull data from the districts versus having the districts push the data up to the state. Currently, 149 of 152 districts use the state-supplied system.

South Dakota has an office of data collection in the department of education that helps with the student count collection. The department has no auditors and the state relies on the district financial audits to audit the student count process for each district.

## Key Findings

The interviews with the four states revealed a number of consistencies and led to key findings in five areas: 1) The level of audit states undertake of student count information and the use of the district audit for student count verification; 2) the type of student data systems a state must have for an effective student count process; 3) how and when student count information is applied to the funding formula; 4) definitions of enrollment and membership within the student count; and 5) the new types of learning opportunities and their impact on the count – especially online learning.

### *Student Count Audits*

Of the four states interviewed, only Minnesota had a designated audit staff within the department of education. This auditor was in place in order to conduct the 25 mandatory audits the state does each year; some of which are targeted to districts that are suspected of having anomalies in the count. The other three states relied more heavily on the districts' annual financial audits conducted by private accounting firms. Arizona went so far as to pay for the local audit. The states did generally have an approach to audit districts or charters when it was deemed necessary but it was not necessarily an ongoing part of each district's or charter's responsibility.

The four states made it clear that having some sort of audit is important but also ensuring that the burden on the state and districts is in line with the benefits of the audit. It is also important to remember that all four of the states use membership as the basis for counting students, a membership count may lend itself to less auditing than an attendance count.

### *Student Information Systems*

Three of the four states interviewed felt they had strong student information systems in place and that these strong systems helped facilitate the student count. The three states' interviewees expressed that the systems could identify each student uniquely – allowing the states to identify students being counted by more than one district/charter; the systems could handle alternative types of enrollment such as concurrent enrollment; and that districts/charters had little compatibility issues with the state

system. South Dakota's system was unique in that it was developed by the state with a contractor to ensure the state received the data it needed. South Dakota then helped facilitate this by giving the basic system to all districts in the state free of charge. The system allows the state to "pull" data from the districts versus the districts having to take time to upload and "push" data to the state. This decreases the administrative burden on districts around student count reporting. Arizona's system on the other hand was limited and was actually a factor in the state's switch to multiple counts versus an ADM count. The system had a hard time handling the large amounts of data required with an ADM system.

The interviews suggest that a very strong statewide student information system is key to running a successful student count. Ideally, the system would allow the state to pull data as needed, eliminating the burden on districts to take time uploading the data. The system would be robust enough to handle alternative types of enrollment and allow for the tracking of students' movement across the state in real time.

In order for any data system to work, clear definitions must be in place for data to be entered properly into the systems. All four states had worked on creating clear definitions of attendance and membership. For attendance, most of the states looked at elementary and secondary attendance differently. Elementary attendance focused on "half day," "full day" or "absent" as the key definitions. Secondary attendance was focused on the percent of the day students were being served by the school. Often there were a minimum number of hours a student had to be in attendance to be full time and then if a student was only in attendance a portion of those hours, the student was marked as attending for that percent of time. Membership definitions differed slightly around when a student was determined to be in membership in a district, with Nebraska leaving this definition up to districts. The definitions of when a student was no longer in membership in the district were more consistent. A maximum number of consecutive days of unexcused absences were set in each state. When that figure was met, a student had to be removed from membership the day after the student's last attended day of school. The number of consecutive days ranged from 10 to 20 days.

### *Student Count and District Funding*

Each of the four states applied the student count differently to the state funding system. Arizona funds districts on the prior year count, with charters being funded on the current year count. The funding is not reconciled for count differences later. Minnesota funds on projected current year counts supplied by districts, and reconciles the difference in the projected count to actual ADM in the fall of the following school year. Nebraska projects funding based on a single day membership count from the prior year and then reconciles funding based on a prior year ADM count. South Dakota funds on a prior year single day count, partly to give the legislature the best possible planning information. Funds are not reconciled for decreases in enrollment. It is important to note that all the states mentioned having some mechanism to help districts with growth and with declining enrollment.

It is not clear that one approach to using the student count within a funding system is the best approach. What is clear, is that states can use various approaches and even combine approaches in order to produce the results they wish to have. It seems most important to apply the counts in a

manner that allows districts/charters adequate time to budget for the coming school year. Districts generally plan for a school year in the spring of the preceding school year. It also seems important to apply the counts in a manner that does not create large swings in funding for either the state or districts/charters.

#### *Defining Enrollment*

Creating clear definitions around both attendance and membership allows districts to classify all students in a similar manner. With the implementation of any student count, this consistency is critical and allows districts/charters to know they will be treated the same way.

#### *Alternative Instructional Models*

Though all the states felt generally comfortable with tracking students in alternative instructional models such as concurrent enrollment, all four states mentioned either having had problems, or currently having problems with the student count efforts for online students. The definitions around how much time a student is enrolled in an online setting is the cause of some of the issues, as funding is tied to hours or attendance. This issue is not quite the same when using membership since funding is based on enrollment in the district rather than attendance, but still comes into play when attempting to determine whether a student is a full-time or part-time student based on the number of total hours or courses taken compared to the total available.

## IV. District and Charter School Input

District and charter school input was gathered using both interviews and a survey. Interviews were held both in person and by phone. The interviews were used to gain information from the districts and to help with the creation of the district survey. Six districts and two charters were interviewed over the course of about a week. The districts and schools ranged in size from just over 100 students to over 85,000 students and included districts and charters from all over Colorado. Of the two charter schools interviewed, one was a K-12 school operated under the authority of the Charter School Institute (CSI) while the other was a 9-12 high school chartered by one of the Denver metro area districts. Six CFOs were also interviewed to help understand the process, the data systems and the fiscal impact to districts.

A protocol was designed and used for consistency across interviews (see Appendix C). The results of the interviews were used to inform the design of an online survey that was sent to every district superintendent and chief financial officer in the state. The survey questions are attached as Appendix D. There were 96 respondents to the survey. Again, respondents represented districts that ranged greatly in both size and geography.

### Membership Definition

From the interviews it became clear that districts in the state do not work under any type of common understanding of what “membership” of a student means. There is general similarity for when a student is considered enrolled, which is based on when a family contacts the school/district and completes enrollment forms. The student is then entered into the district’s student database. Typically the student is considered enrolled unless he/she does not attend classes at the start of school. At that point the district will attempt to contact the family. If that fails, the district will contact a social services agency to see if it can determine the situation of the family. Districts strive to have students they cannot locate cleaned from their enrollment records prior to the October count period.

Both of the charter schools interviewed placed restrictions on if and when students could enroll after the start of the school year. In one charter school, students were not accepted beyond the first several months of the school year because a student would have fallen too far behind in the school’s specialized curriculum. The other school restricted new enrollment to the first four days of each of six six-week instructional blocks.

There is more variation for when a student is considered withdrawn from enrollment in the district. Typically, a district withdraws a student if they are notified by the family/student or if they receive a records request from another school or district. Several districts and both charter schools have a policy that if a student has 10 consecutive days of unexcused absences, then the district will attempt to contact the family or track them through social services. If the family/student cannot be located, the student is withdrawn.

The charter school with the six week instructional blocks is a 9-12 high school that serves a high-risk student population. Students who do not meet an 83% attendance goal each instructional block may be put on probation and expelled from school for up to two blocks before being permitted to return.

Several districts said that there is no incentive or reason to un-enroll a student, as funding isn't affected. In fact, a number of districts mentioned the difficulty students can have in reentering school if they are un-enrolled. Keeping them enrolled allows them to re-enter school without any paperwork requirements. There is some concern that if some students are asked to put additional effort into reenrolling, they may be less likely to return to school. Failing to un-enroll a student, however, can mean that a student's record may not get purged until the file is cleaned for the next year's October count or for the end of year count.

## Attendance

Both the definition of and the taking of attendance are generally consistent across Colorado. Every district and both charter schools interviewed said that they took attendance every day. For elementary schools, attendance is taken twice per day, in the morning and afternoon; students are classified in four general categories:

- Tardy – late to school but attending a full day;
- Half-day – either attending just the first or second half of the day;
- Absent – not attending for the whole day; and
- In attendance – in attendance for the full day.

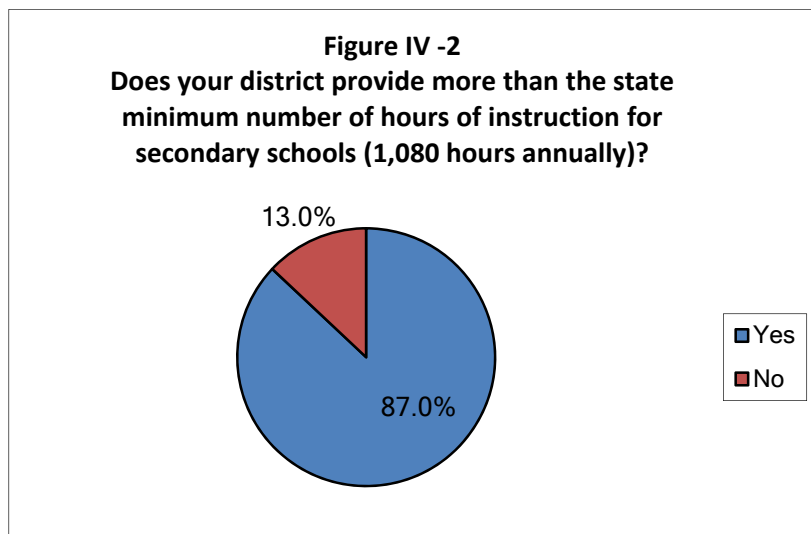
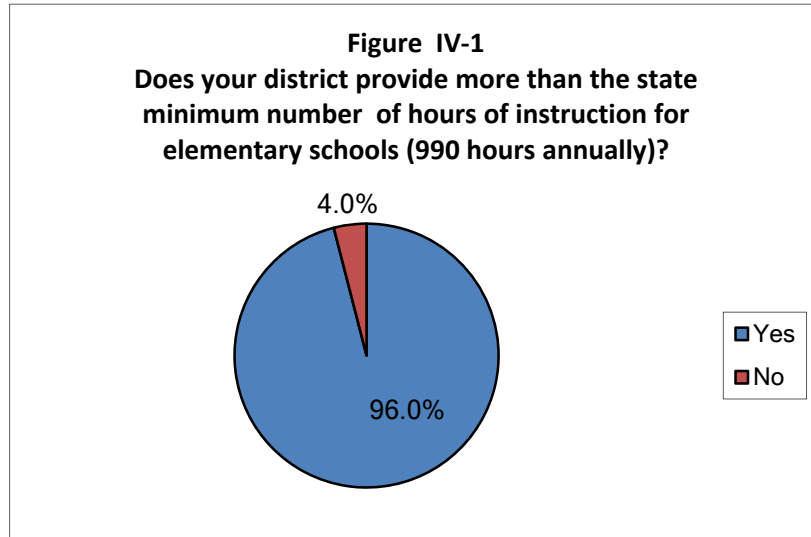
For secondary schools, attendance is taken every period and attendance is reported based on the number of periods attended compared to the number of available periods. For high schools, students may be considered in full attendance if they attend for a minimum number of periods. For example, a student may only need to attend five periods of a seven period day to be deemed in attendance for the full day. The data at both levels is generally inputted into a student data system by the teacher. The systems allow data to be tracked throughout the district and aggregated up to the district level. The survey results from districts throughout Colorado were confirmed by responses from the interviews conducted with individual schools and districts.

## Instructional Hours

Districts also were asked about the number of instructional hours provided to students. Though it can vary by district, and even by school within districts, almost all districts and both charter schools provide instructional hours above the statewide minimums of 990 hours for elementary and 1080 hours for secondary. The survey showed that over 96% of respondents provide more than the mandatory

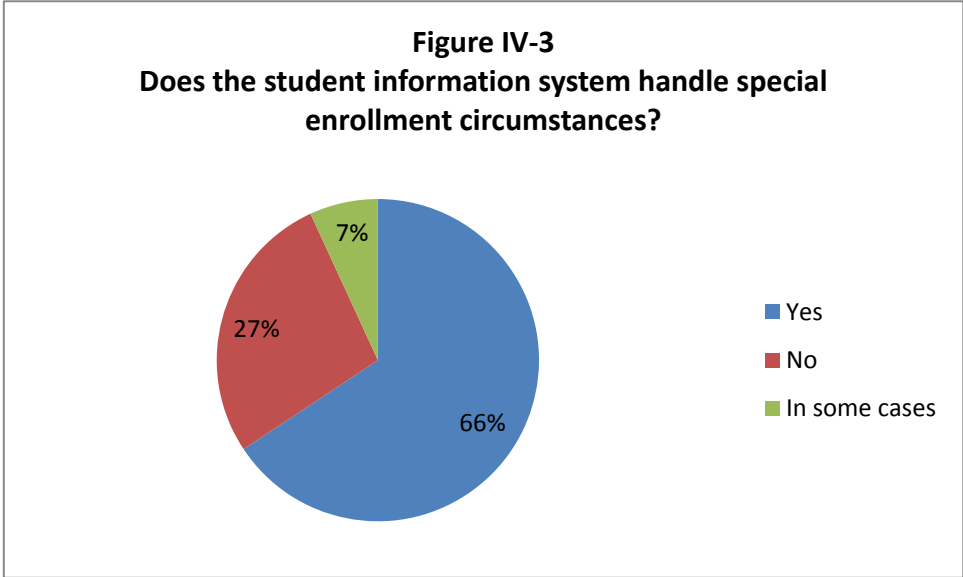


elementary hours and nearly 90% provide more than the mandatory secondary hours. (See the Figures IV-1 and IV-2 below).



## Enrollment Options

Another issue around counting students, for both attendance and membership, is the tracking of students in unique circumstances. These include students in programs such as concurrent enrollment, online, early childhood, special education, etc. District representatives mentioned in the interviews that these types of students can be difficult to account for during the October count, although the survey revealed that most districts believe their current student information systems can handle these special circumstances. As the Figure IV-3 below indicates, two thirds of respondents said their current student information systems could automatically track these types of students, while seven percent said the system handles them in some cases.



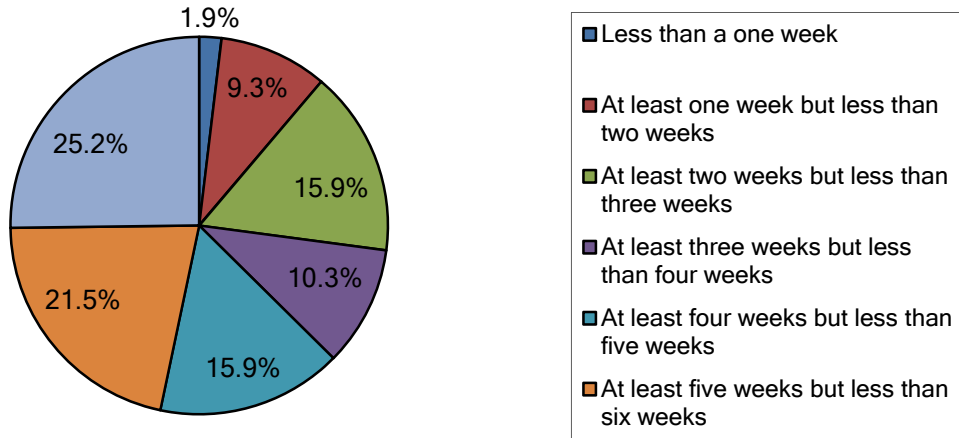
However, in some cases districts indicated that the level of tracking their data systems provide may not meet the requirements they feel are necessary for the October count reporting and audit. Districts mentioned additional documents had to be maintained to help during the audit process.

**October Count Administration**

Both the district interviews and the survey allowed us to collect information on the process for undertaking the October count. The issues addressed range from the amount of time it takes to undertake the count to the type of computer hardware and software districts need to undertake the count.

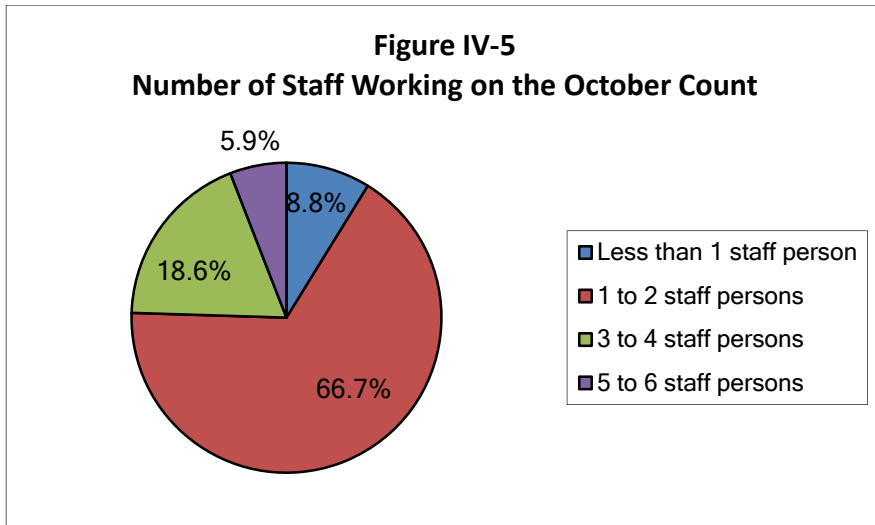
All districts spend a period of time developing, verifying and reporting the October count. The amount of time it takes generally is based on the size of the district. A very small number of districts take less than a week to complete the October count. Over 25% of respondents take over six weeks to complete the October count work. (See Figure IV-4 below) The two charter schools interviewed for this study reported spending four to six weeks preparing for and conducting their October count.

**Figure IV-4**  
**In a typical year, how many weeks are required to develop, verify and report your district's October student count to the Colorado Department of Education (CDE)?**



During the interviews, a number of larger districts mentioned that they had staff that worked on the October count nearly year round. This included preparing for the count in the spring, training staff on the count in the summer and fall, conducting the count, reporting the count, and then working with the CDE to verify the count afterward. For a few of the districts, more than one person working a good portion of the year was required to complete the task.

The number of people working on the count varied widely, though as district size increased the number of people to accomplish the task also tended to increase. The smaller of the two charter schools had one staff person who dedicated most of her time during the count period to conducting the count. The other school, a larger k-12 school, has five registrars who dedicated much of their time to the count during the primary count period. The survey revealed a range of staffing for survey respondents from less than one to over six people working on the count (see Figure IV-5).



Several districts said that hundreds of staff may be involved in the count when school-level personnel are included in this number. Though these staff may only focus on the count for a short period of time, they are crucial in getting accurate figures reported. Since the October count is attendance-based, school level personnel are integral to handling the count for each district. It is up to these staff to ensure students are in attendance and to ensure that the district has documentation consistent with that required by state auditors.

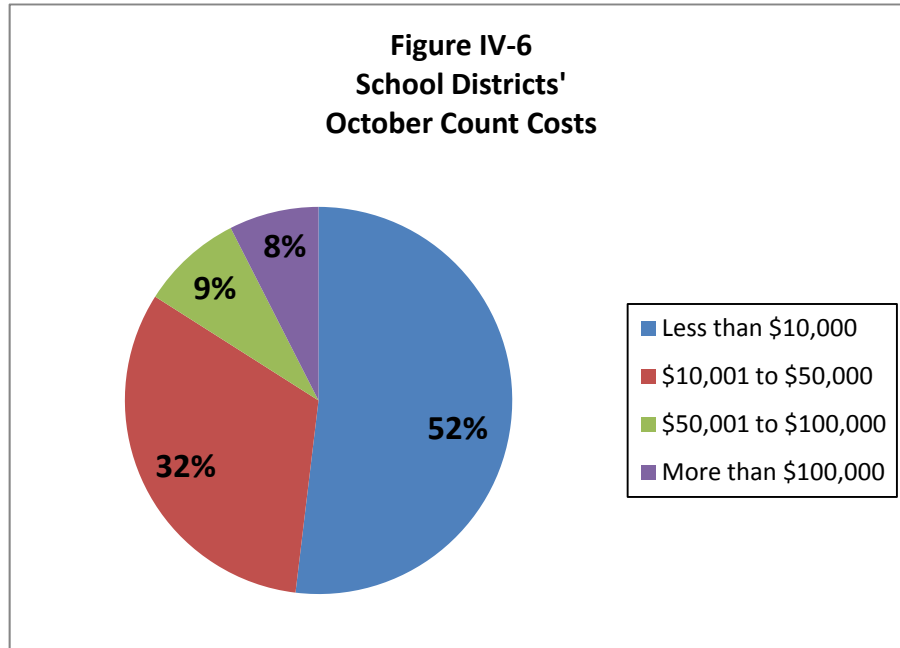


Figure IV-6 shows the amounts districts reported as costs for undertaking the count. The cost of undertaking the count is clearly related to district enrollment. The average size of the 55 districts reporting spending less the \$10,000 was 1,500 students. The average size of the 34 districts reporting spending \$10,001 to \$50,000 was 5,500 students and for the nine districts spending \$50,001 to

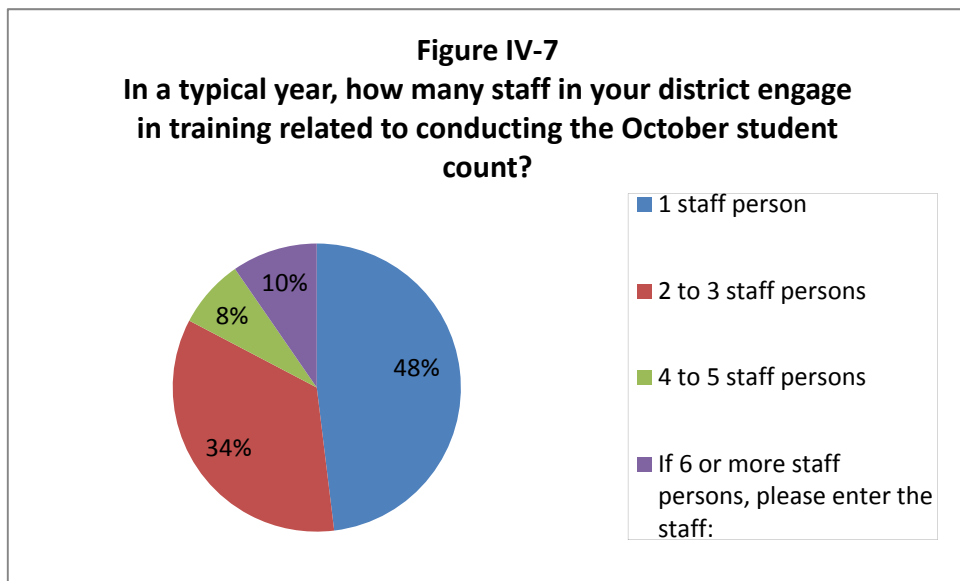
\$100,000 was 22,400 students. The average enrollment of the eight districts reporting spending more than \$100,000 was 33,600 students.

### Verifying and Auditing Data

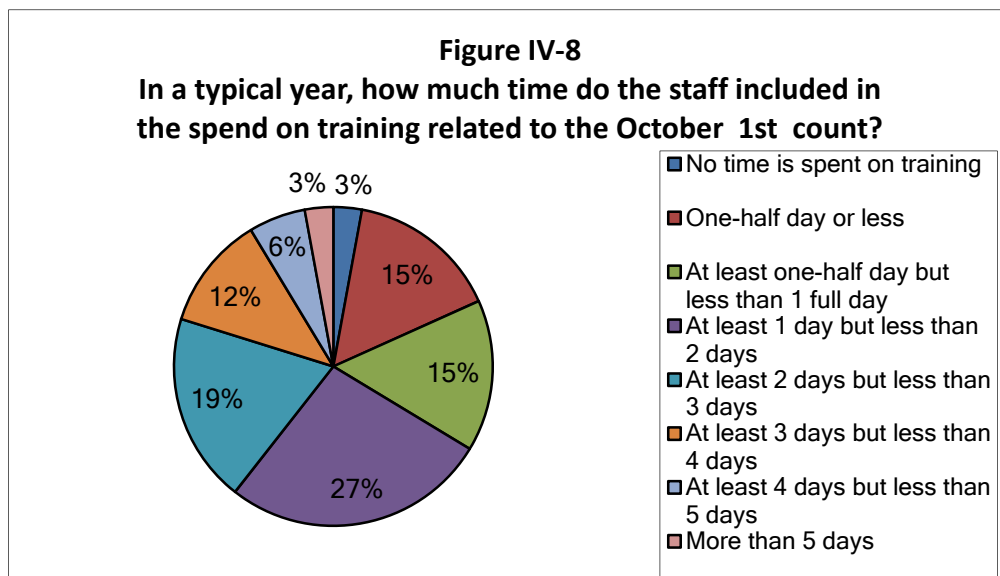
During the interviews, it was expressed that a significant portion of the personnel time associated with the October count was linked to the reporting/auditing requirements. Each district is audited on every October count. Some districts (generally the largest ones) are audited every year, while most districts are audited every three years on the previous three years' October counts. As was mentioned in the attendance section, districts spend a great deal of time and effort to ensure they keep records of each student's attendance. The districts mentioned keeping a "paper trail" for each student, sometimes keeping detail such as individual student homework assignments turned in on the October 1<sup>st</sup> date. Districts mentioned that the proliferation of alternative types of enrollment, such as concurrent or online enrollment, has increased the difficulty of keeping adequate records for each student. They indicated the paper trail was becoming larger and more time consuming in order to comply with the state audit.

### Staff Training

In order to have an accurate count, staff must be trained on the count requirements and procedures. Training can be delivered by a number of groups including the CDE, the district itself or even the student information system vendor. The survey shows that the majority of districts rely on the CDE to provide the training with in-house training the second most popular option. The number of personnel trained varies but the vast majority of survey respondents had three or less staff trained each year. Only about 10 respondents had six or more personnel trained.



As Figure IV-8 shows, the amount of time each of the employees spent on training ranged from a half day or less, to five or more days. The vast majority of respondents said that training lasted less than 3 days for each of the employees trained.

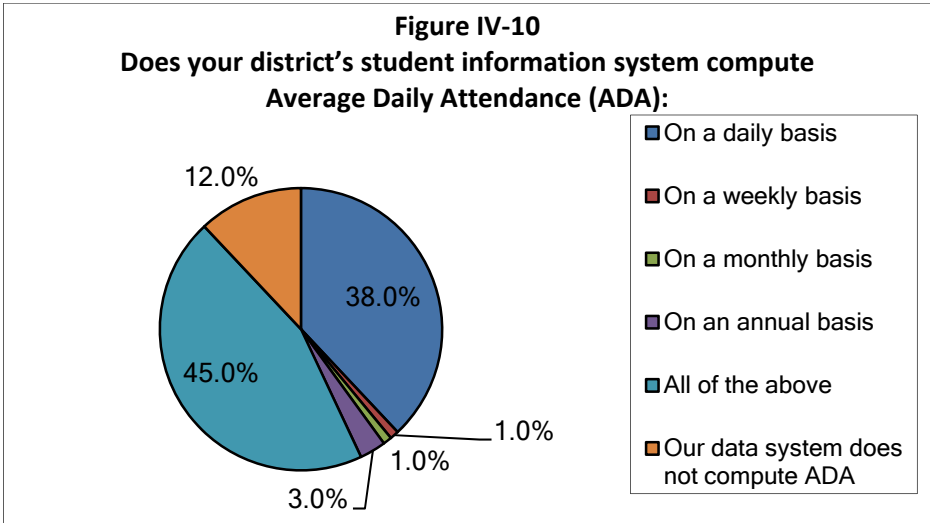
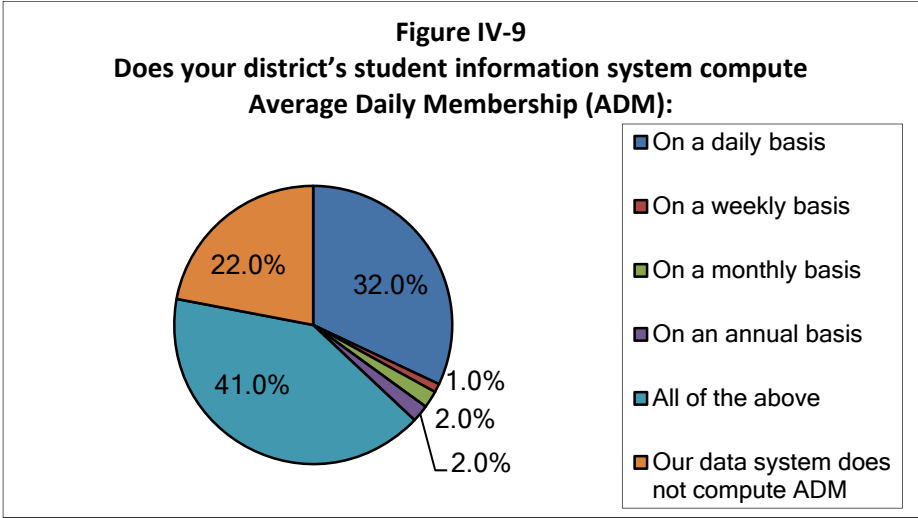


One of the charter schools interviewed noted that little time was spent on staff training related to the October count, while the other had one staff person participate in all of the training offered by the CDE, and at times the school’s director would also attend the training.

### Student Information Systems

Another area of concern surrounding the October count was ensuring that districts have up to date and adequate student information systems. The systems have to be both useful and cost effective for the district but also must communicate well with the CDE data system. Districts currently use a variety of data systems but the most common seems to be Infinite Campus, with over 50% of survey respondents using this system. One of the charters also used Infinite Campus while the other used PowerSchool, which is required by CSI. The systems generally are successful in communicating with the CDE and have maintenance contracts that allow for both major and minor changes from the state to be incorporated into the system. Still, over two thirds of districts reported having some sort of compatibility issues with 25% reporting such issues as “major/severe.” Only the charter school using Infinite Campus reported connectivity issues with the CDE’s data systems.

The data systems, including those used by charter schools, also seem to be capable of computing both ADM and ADA in their current formats. Close to 80% of districts reported using systems that currently report ADM at least yearly with nearly 75% saying that it can be computed as frequently as daily. Over 80% of districts can compute ADA daily. More than twenty percent of districts cannot report ADM at all, while 12% of districts cannot report ADA. (See Figures IV-9 and IV-10 below)



**Key Findings**

The district interviews and survey results indicate several key findings.

1. Districts and the state could benefit from a statewide definition for attendance— perhaps different for elementary and secondary – and membership. With no state definition, the current definitions of membership vary widely from district to district. It may even be useful to create a common enrollment form across the state that would allow districts to indentify, verify residency and track students in the same way. Currently these definitions are largely driven by the audit process and can vary depending upon the auditor.

2. Districts currently treat the October count as a very high stakes event. The count determines all funding for the entire year. Along with the high stakes of funding, the districts believe there is a high reporting burden related to the October count. Since the count is so high stakes, it has become very important to keep detailed documentation (paper copy of student schedules, homework, assignments) of each student's attendance at a level of detail that some districts find onerous, particularly larger districts. The burden of the count for districts is not just the planning and undertaking of the count but also the process of ensuring appropriate documentation for each student in preparation for a state audit.
3. Districts currently have student data systems that generally handle all of the data needs related to the student count. Ideally a statewide student data system would be put in place that allows the state to "pull" the needed data on a continuous basis rather than requiring districts to upload and "push" data to the CDE at certain times of the year. This would alleviate time and staff burdens on districts for sending data to the CDE.
4. Districts do not believe there needs to be an incentive to serve more students or to incentivize graduation. The districts feel they currently do everything possible to retain students and to ensure students get the best education possible. This is reinforced under the new accreditation/accountability requirements.



## V. School District Average Daily Membership and Student Transfers Data Analysis

One of the goals of this study is to estimate the impact on district and charter school student counts of adopting an Average Daily Membership (ADM) count in lieu of the current single October Count. To accomplish this analysis we requested student enrollment/membership data from two different data collection series administered by the CDE. The first data collection, Safety and Discipline Indicators, is reported to the CDE by districts annually in May and June<sup>9</sup>. This data collection includes, among other things, data fields that provide a way to estimate ADM and also contains the Average Daily Attendance (ADA) counts which were the source of the ADA data presented in the previous school accountability reports (SAR). The other data collection, the Student End of Year dataset reported in July, includes data on student transfers into and out of districts and charter schools and the reasons for these transfers. In both datasets the counts are headcounts, so students in kindergarten are recorded as 1.0 rather than 0.5. For both data collections we requested three school years of data, 2007-08 through 2009-10, to provide some indication of enrollment trends, and we also requested data at both the district and school levels. In addition to the 178 standard school districts, all datasets also included records for BOCES (Boards of Cooperative Educational Services) and the Charter School Institute (CSI).

In both cases these datasets are largely unedited and unaudited, and since they are not high-stakes for districts for funding, the amount of care in compiling and reporting these data likely vary from district to district. However, the CDE has been working with districts to improve the quality of data because they will serve as the basis for elements of the state's new accountability system. As a result, we can expect more recent data to be of higher quality than earlier reports.

### District ADM Estimates

The estimates of ADM counts for each of the three years of data were made using data from the Safety and Discipline Indicators file. This file reports three key variables:

1. Total Student Days Possible: The total possible days students who were enrolled would have attended school without absences during the school year. This represents total student days of enrollment or total students enrolled per day times total days school is in session.
2. Length of School Year: Total number of days a school is in session.
3. Total Days Attended for All Students: The total days students attended during the school year.

Using the first two variables listed above, ADM was estimated at the school level and aggregated up to a district total. ADM for each school was calculated by dividing Total Student Days Possible by Length of School Year.

Because the data were available and there is some interest in also understanding the relationship between ADA and the October count, we also calculated an estimate for ADA at the school level by dividing Total Days Attended for All Students by Length of School Year.

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<sup>9</sup> The reporting periods for both the Safety and Discipline and Student End of Year data collections are referenced from the CDE's Automated Data Exchange 2010-11 Collection Calendar.

Both ADM and ADA were calculated at the school level and aggregated to the district level because in most districts schools have different numbers of days in session, with the difference usually occurring between elementary and secondary schools. The 2009-10 file included 1,762 schools. The state average length of school year was 169.6 days. By school level it was: elementary 169.9 days, middle/junior high 170.2 days and senior high 168.5 days.

District average ADM and ADA were calculated both including and excluding charter schools to examine whether the inclusion of charter schools, which for various reasons may have somewhat different enrollment patterns than traditional district schools, impacted the overall district counts. The 2009-10 file included 158 charter schools, including CSI schools. The 2008-09 file included 145 charters and the 2007-08 file 135 charters. Charter schools were identified by matching to the CDE charter school directory. We found that there was very little difference in aggregate district counts whether charters were included or not.

To investigate whether certain district characteristics such as setting (e.g. urban, suburban or rural), poverty levels or graduation rates impacted the relationship between a district's October count and estimated ADM, we matched the district level student count files with other CDE files to bring in variables for district setting (Denver Metro, Urban-Suburban, Outlying City, Outlying Town and Rural), district average free and reduced price lunch percentage (a common measure of school poverty), and graduation rates for 2007-08 and 2008-09 (graduation rates were not yet available for 2009-10).

Tables V-1 and V-2 below show statewide summaries for each of the three years of data analyzed and for the three-year average of the data. Table V-1 shows the results when charter schools are included in district totals and Table V-2 shows results when they are excluded. Figures V-1 and V-2 below also compare the three counts for each of the three years examined and for the three-year average.

Table V-1  
Comparison of Fall Count, ADM and ADA Counts  
With Charter Schools Included  
2007-08 to 2009-10

Year	Fall Count	ADM	Difference from Fall	% Diff.	ADA	Difference from Fall	% Diff.
2007-08	801,698	786,151	(15,547)	(1.9%)	735,453	(66,245)	(8.3%)
2008-09	817,459	797,088	(20,371)	(2.5%)	747,729	(69,730)	(8.5%)
2009-10	831,633	815,590	(16,043)	(1.9%)	762,014	(69,619)	(8.4%)
3-Year Average	816,930	799,610	(17,320)	(2.1%)	748,398	(68,532)	(8.4%)

Table V-2  
 Comparison of Fall Count, ADM and ADA Counts  
 With Charter Schools Excluded  
 2007-08 to 2009-10

Year	Fall Count	ADM	Difference from Fall	% Diff.	ADA	Difference from Fall	% Diff.
2007-08	749,295	735,587	(13,708)	(1.8%)	687,747	(61,548)	(8.2%)
2008-09	759,317	741,551	(17,766)	(2.3%)	695,108	(64,209)	(8.5%)
2009-10	767,099	752,796	(14,303)	(1.9%)	702,571	(64,528)	(8.4%)
3-Year Average	758,570	743,311	(15,259)	(2.0%)	695,142	(63,428)	(8.4%)

Whether including or excluding charter schools from the totals, the estimated ADM count, on average, was about 2.0% lower than the fall October count membership number. There was some variability from year to year, with the difference between the October count and ADM somewhat higher in 2008-09. It is not clear why 2008-09 differs more significantly from the other two years, but it is possible it is related to the data quality issues discussed above.

When looking at how ADA compares to the October count, the difference was significantly greater, with ADA averaging 8.4% less on average over the three years, a difference of more than 63,000 students.

On average, charter schools had somewhat larger differences between their ADM, ADA and October count totals than did districts. Using three-year averages for the 135 charter schools for which we had three years of data, the average percent difference between the ADM and October counts was 3.8% and the average percent difference between ADA and the October count was 9.0%. Part of the difference between charter schools and districts may be explained by the smaller enrollment size of charter schools, where, like small districts, the movement of relatively few students may have a large impact in percentage terms. Based on our interviews with charter schools, enrollment policies in some charters may also play a role. For example, some charter schools close off new enrollment relatively early in the year because they use specialized curricula which would place students enrolling later in the year at a disadvantage due to the amount of instruction missed.

When looking at the student count changes from October count to ADM district by district, we found a considerable range of differences. Comparing districts' estimated ADM to their October count using the three year average, the greatest amount by which ADM exceeded the October count was by more than 27%. Five other districts saw their ADM exceed their October count by more than 5%, although no other districts experienced double digit increases. Conversely, ADM was less than the October count by more than 10% in 11 districts, with the largest decrease being 15.8%. For charters, the differences

ranged from a positive 26.1% to negative 29.9%. The coefficient of variation for the percent difference among districts was .193 and for charters .224, both values that indicate moderate levels of variation.<sup>10</sup>

Based on the three-year average, a total 38 districts had estimated ADM larger than their October count and 143 districts had a lower student count under ADM (annual figures out of 181 districts were 51 and 130 districts respectively in 2007-08, 44 and 137 districts in 2008-09 and 43 and 138 districts in 2009-10).

We can take a closer look at the degree of variation among districts if we categorize districts according to the number of standard deviations the percent difference of each district is from the average for all districts. We find that 129 of the 178 regular school districts fall within one standard deviation of the average percent change of 2.1%.<sup>11</sup> Using the three-year average percent change, one standard deviation is equal to  $\pm 4.8\%$ . This means that 129 districts had an average percent change ranging from a positive 2.7% to a negative 6.9%. Forty-five of these districts varied from the average by one-half of a standard deviation, or  $\pm 2.4\%$ . Thirty-four districts varied from the average by two standard deviations, meaning their percent difference ranged between  $\pm 4.8\%$  to  $\pm 9.7\%$ . Another 13 districts varied from the average by three standard deviations, ranging from  $\pm 9.7\%$  to  $\pm 14.5\%$ . The two districts with the largest percent difference (a positive 27% and negative 15.8%) were more than three standard deviations from the average of 2.1%.

We also examined the characteristics of the districts falling into each standard deviation category. Table V-3 below summarizes our findings.

Table V-3  
Comparison of Districts by  
Number of Standard Deviations  
Three-Year Average Percent Difference

Standard Deviations	Number of Districts	Average % Diff.	2010 Enrollment	2010 Free/Reduced Lunch %	2010 Attendance Rate
0.5 ( $\pm 2.4\%$ )	84	(0.7)	4,766	43.9	93.9
1.0 ( $\pm 4.8\%$ )	45	(1.7)	7,273	47.7	93.8
2.0 ( $\pm 9.7\%$ )	34	(5.2)	2,180	46.5	94.2
3.0 ( $\pm 14.5\%$ )	13	(11.5)	389	41.4	92.5
More than 3.0	2	5.7	239	43.0	92.8

<sup>10</sup> The coefficient of variation is a statistical measure of the amount of variation a set of values has around its mean (average). The coefficient of variation is calculated by dividing the standard deviation of the values by their mean.

<sup>11</sup> The standard deviation is a measure of the dispersion of a value around the mean (or average). A small standard deviation means there is relatively little variation or dispersion around the mean, a large standard deviation means there is more dispersion or variability.

The table above shows that those districts with larger percent differences between their estimated ADM and October count tend to be smaller in terms of enrollment and have somewhat lower attendance rates than those with smaller percent differences. The percentage of students eligible for the free and reduced lunch program did not appear to have any affect. It also shows that relatively few districts have differences greater than plus or minus five percent.

Table V-4 below shows the distribution of districts by setting. This table shows that the geographic setting with the largest proportion of districts with larger differences between estimated ADM and October count was the rural setting. Thirty-nine percent of rural districts had a percent difference of two or more standard deviations compared to about 14% of Denver metro, outlying city and urban-suburban districts. Eighteen percent of outlying town districts were two or more standard deviations from the average. This again illustrates that smaller districts tend to experience greater volatility in their enrollment.

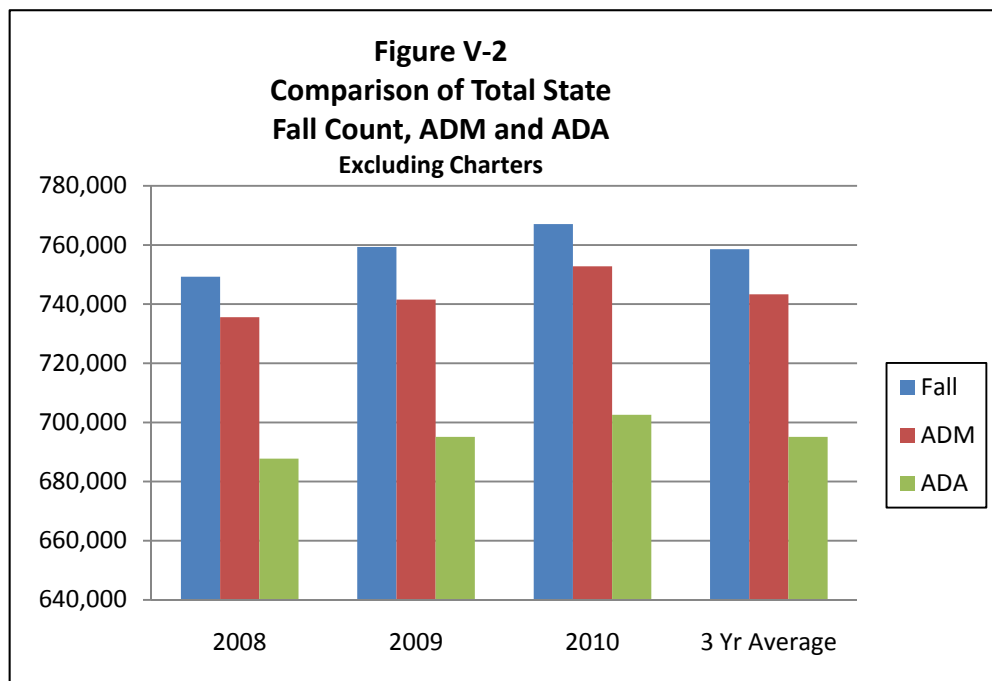
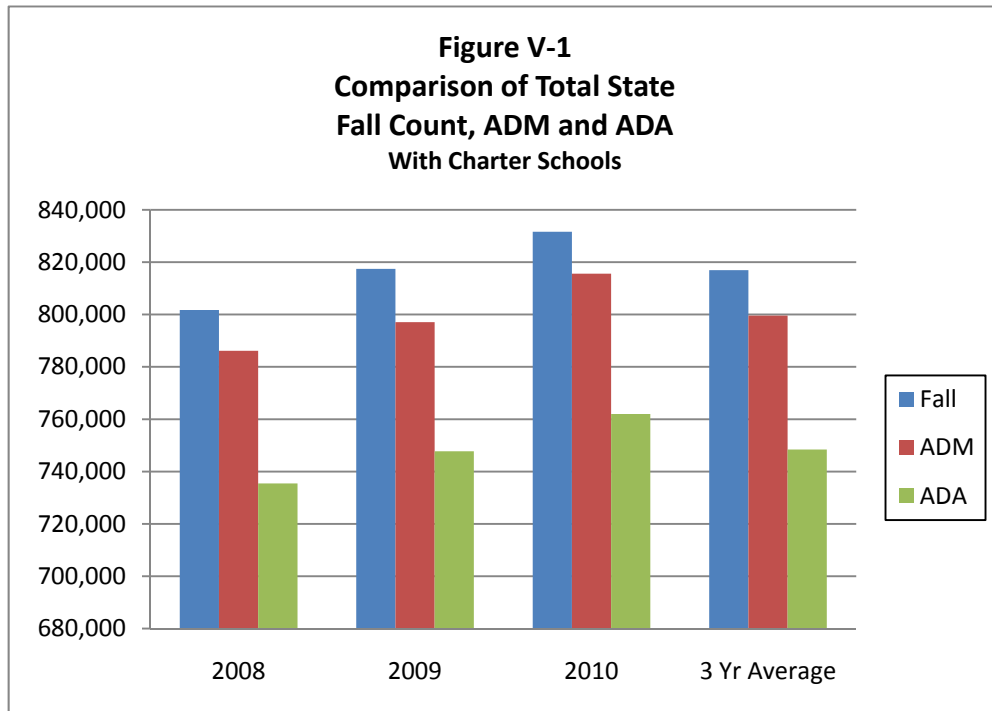
Table V-4  
Number of Districts  
By Setting and Number of Standard Deviations  
Three-Year Average Percent Difference

Standard Deviations	Denver Metro	Outlying City	Urban-Suburban	Outlying Town	Rural
0.5 ( $\pm 2.4\%$ )	5	9	9	28	33
1.0 ( $\pm 4.8\%$ )	7	3	4	12	19
2.0 ( $\pm 9.7\%$ )	2	2	2	7	21
3.0 ( $\pm 14.5\%$ )	0	0	0	2	11
More than 3.0	0	0	0	0	2

The difference between October count and ADM in the five largest districts, with fall enrollments ranging from just under 37,000 to more than 85,000 in 2009-10, on average was nearly identical to the state average, averaging a 2.0% decrease from the October Count to ADM over the three years. The percent change ranged from a maximum of a 4.8% decrease to a 0.6% increase under the ADM count. All but one of the five districts experienced a decrease in their student count under ADM. The size of the differences and the rank order of the districts varied somewhat from year to year. For example, in the latest year, 2009-10, the average difference was a 1.9% decrease, while the range was from a 4.2% decrease to a 0.2% increase.

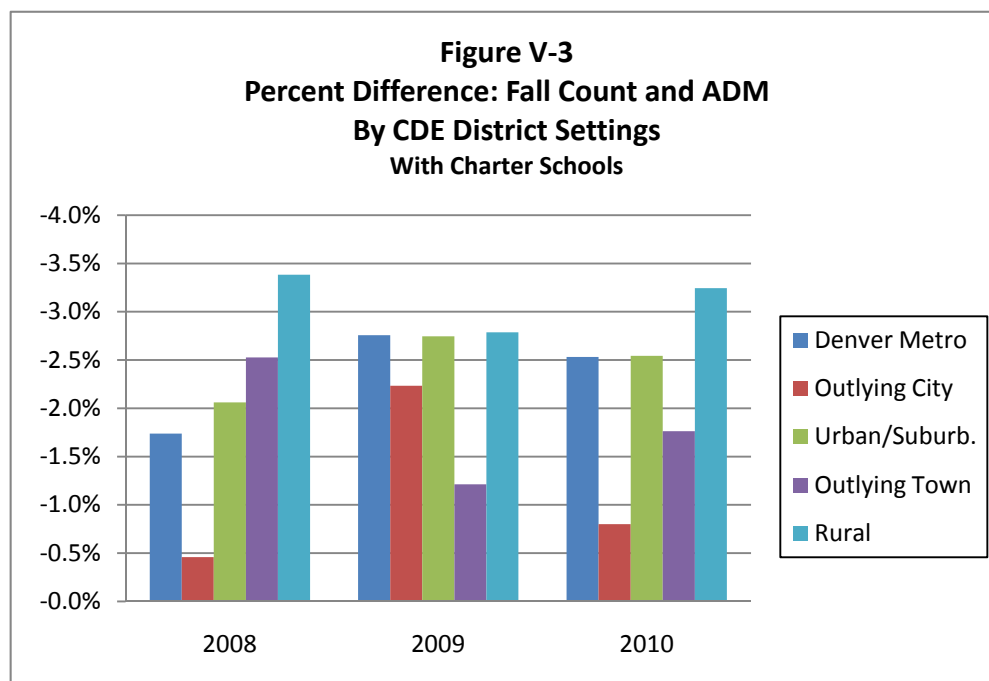
All of the districts with largest differences between their October count and ADM were smaller districts. In the five districts with the largest positive difference (ADM exceeding October count) the average October count enrollment was 296. In the five districts with the largest negative difference the average enrollment was 331. These smaller districts likely saw greater swings in their student counts because

the gain or loss of just a handful of students will have a larger impact in percentage terms on their enrollment.



## Effects of District Characteristics

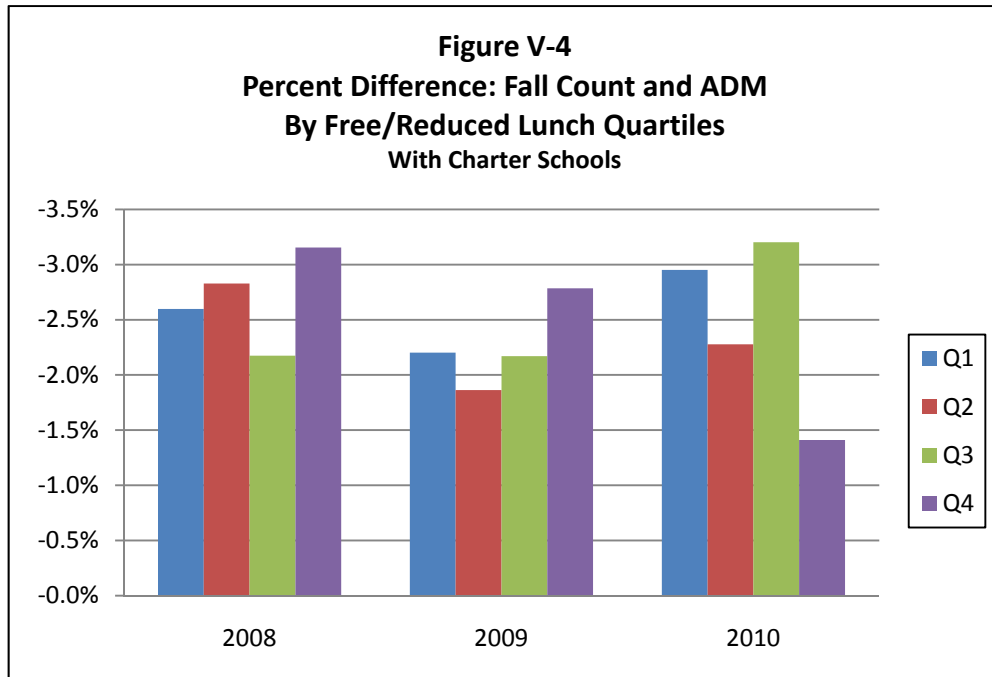
Our analysis using statistical correlation methods found no statistically significant relationship between a district's change in student count between the October count and ADM and district characteristics such as setting, poverty, district size, or graduation rate. As noted above, there appeared to be some relationship between attendance rates and change in district counts, although this varied significantly from year to year. The correlation with attendance rate was -0.17 in 2007-08, -0.70 in 2008-09 and 0.15 in 2009-10. These are inconsistent results suggesting a small negative relationship in 2007-08 (meaning as attendance decreases the difference between a district's October count and ADM increases), a strong negative relationship in 2008-09 and a modest positive relationship (meaning that as attendance decreases so does the difference between October count and ADM) in 2009-10. There is no obvious explanation for these divergent findings.



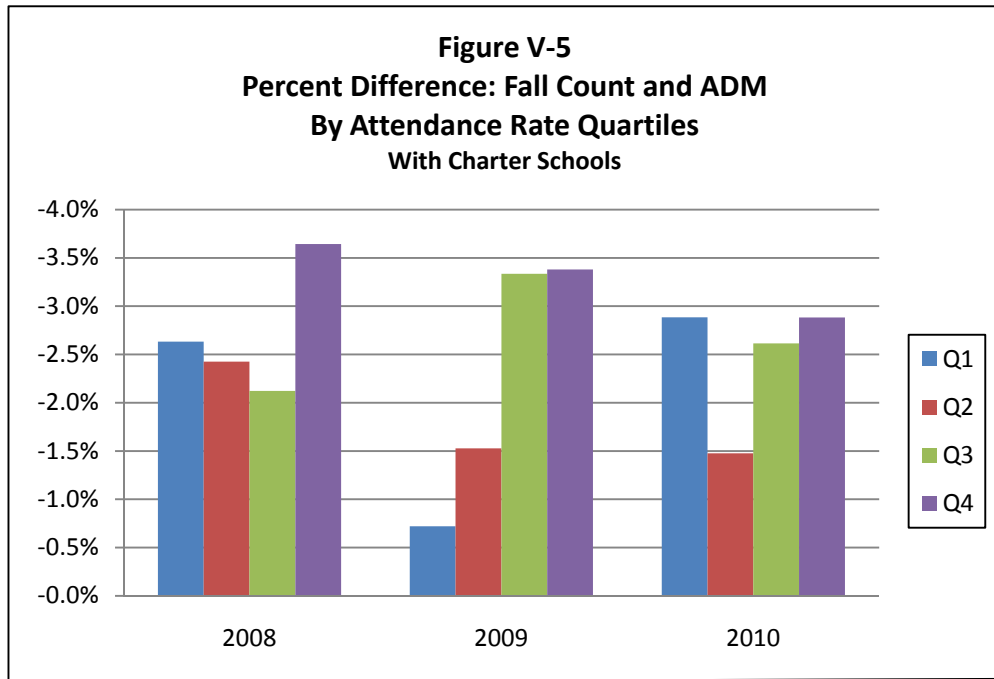
Although the correlation analysis indicated that there was no statistically significant relationship between district setting and change in student count, similar to our analysis above, Figure V-3 appears to show some consistencies across the three years, with rural districts experiencing larger decreases in two out of the three years and outlying cities showing smaller decreases. Again, the results for 2008-09 differ somewhat from the other two years.

Figure V-4 below shows the average percent difference between a district's October count and ADM by quartiles of districts' free and reduced price lunch percentages. Quartiles divide a group of items, in this case districts, into four equal groups. The first quartile represents the group of districts with the lowest percentage of free and reduced lunch students, while the fourth quartile represents the group of districts with the highest percentage. The second quartile is the median, or mid-point, of all of the

districts. There is no apparent pattern from year to year, which supports our finding that there is no statistically significant relationship between district poverty levels and the divergence of their October count and ADM totals. Similarly, Figure V-5 shows average percent difference between the October count and ADM by attendance rate quartiles. Districts in the first quartile have the lowest attendance rates while those in the fourth quartile have the highest. This chart suggests that those districts with better attendance rates experienced the largest decrease in their student count when going from October count to ADM. Less of a pattern can be seen in the other three quartiles.







### Student Transfers Analysis

We used student transfer data from the CDE End of Year files, which included monthly counts for July through June for each year, of the total number of students transferring into a school or district and total students transferring out. A base count representing the end of year June enrollment count for the prior year (years 2006-07 through 2009-10) was also provided. Analyses were done both at the district level and by school level (e.g. elementary, middle and high school). The CDE classifies transfers by a number of different entry and exit codes signifying the reason for the transfer, for example a student may transfer into a district from another school district or private school, or a student may transfer out, or exit, a district to attend an online school or because of expulsion. Appendix E provides a list of the entry and exit codes used to develop the transfer counts used in this analysis.

This analysis tracks students' transfers into and out of districts on a monthly basis. The analysis looked at transfers by district totals and by school level (elementary, middle and high school). As Table V-5 below shows, the greatest number of net "in" or positive transfers (that is, total transfers in minus transfers out) occurs in August, as families are getting their students ready to start school. The month with the second largest net transfers-in is July, while September and January also have small positive net transfers. These data show the months of May and June with the largest net transfers out of districts. These numbers are driven by high school graduation. December has the next largest number of net transfers out or exits.

Monthly membership totals may be estimated by starting with the end of year enrollment count from the previous June and adding the net transfers in/out monthly counts across the fiscal year. Table V-6 below shows that with this method the month with the largest average enrollment is September, while the month with the lowest average enrollment is June, again reflecting the drop in enrollment caused by graduation. Note: these enrollment numbers do not coincide with the ADM estimates made using the Safety and Discipline file data and are less accurate for estimating ADM for a nine-month school year.

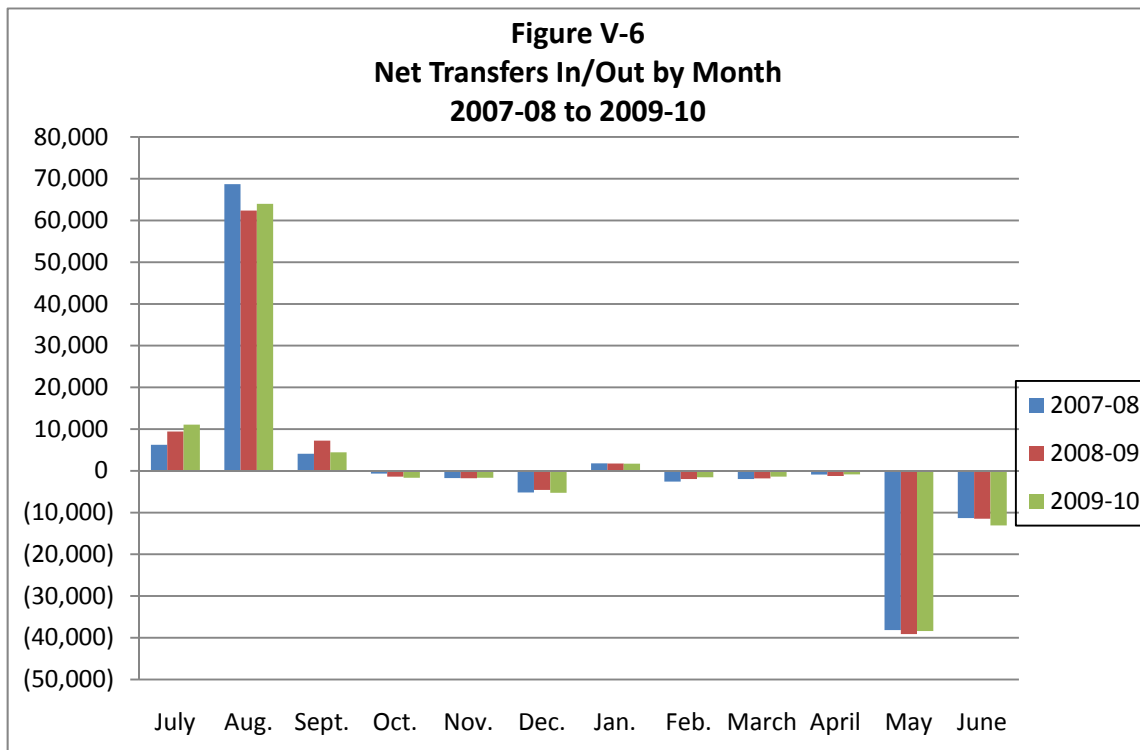
Table V-5  
 Net Transfers by Month  
 With Charter Schools Included

	July	Aug.	Sept.	Oct.	Nov.	Dec.	Jan.	Feb.	March	April	May	June
2007-08	6,239	68,708	4,085	(653)	(1,736)	(5,195)	1,810	(2,574)	(1,954)	(878)	(38,174)	(11,320)
2008-09	9,409	62,364	7,233	(1,388)	(1,760)	(4,586)	1,737	(1,973)	(1,799)	(1,228)	(39,131)	(11,483)
2009-10	11,064	63,965	4,438	(1,653)	(1,662)	(5,277)	1,699	(1,545)	(1,373)	(867)	(38,393)	(13,071)
Total	26,712	195,037	15,756	(3,694)	(5,158)	(15,058)	5,246	(6,092)	(5,126)	(2,973)	(115,698)	(35,874)
Mean	8,904	65,012	5,252	(1,231)	(1,719)	(5,019)	1,749	(2,031)	(1,709)	(991)	(38,566)	(11,958)

**Table V-6**  
**Estimated Membership by Month**  
**Using EOY File Data**

Estimated Membership by Month							
	July	Aug.	Sept.	Oct.	Nov.	Dec.	Average Annual Membership
2007-08	735,572	804,280	808,365	807,712	805,976	800,781	
2008-09	751,537	813,901	821,134	819,746	817,986	813,400	
2009-10	766,833	830,798	835,236	833,583	831,921	826,644	
Mean	751,314	816,326	821,578	820,347	818,628	813,608	
2007-08	802,591	800,017	798,063	797,185	759,011	747,691	788,937
2008-09	815,137	813,164	811,365	810,137	771,006	759,523	801,503
2009-10	828,343	826,798	825,425	824,558	786,165	773,094	815,783
Mean	815,357	813,326	811,618	810,627	772,061	760,103	802,074

Figures V-6 and V-7 below summarize the average net transfers in and out of districts for the years 2007-08 through 2009-10 and the estimated average monthly membership over the course of the fiscal year (July 1 through June 30) for the same years.



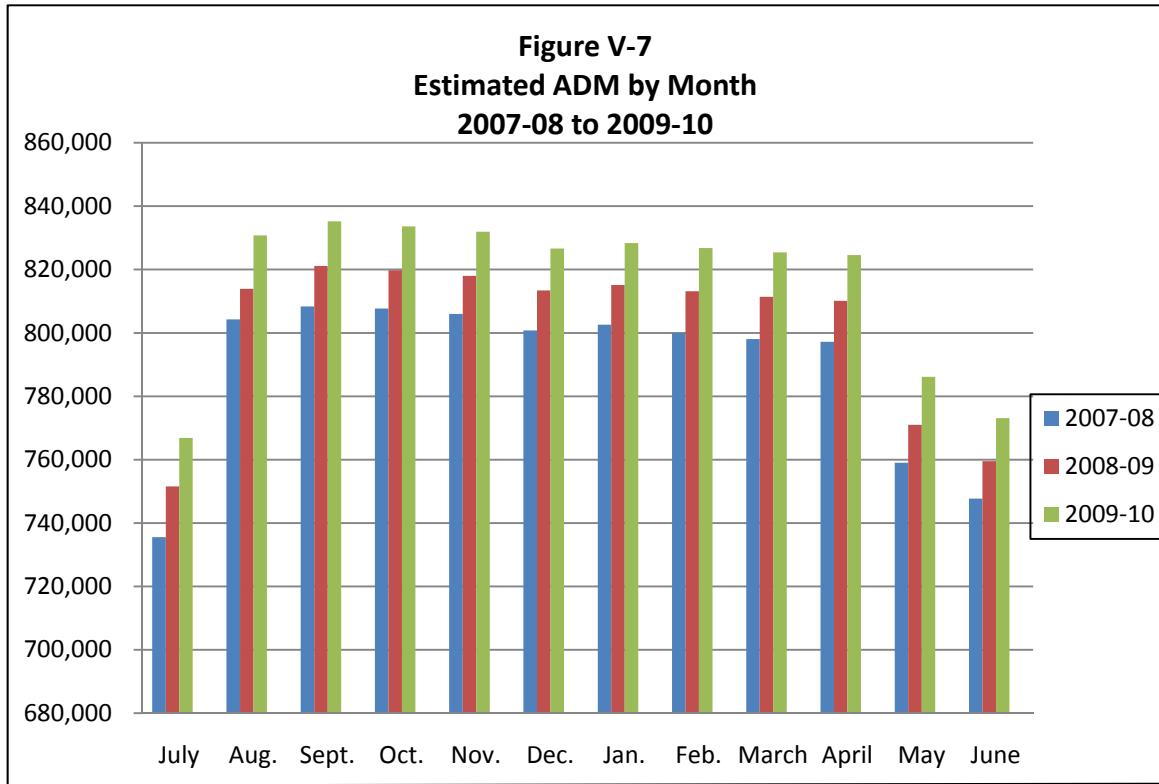
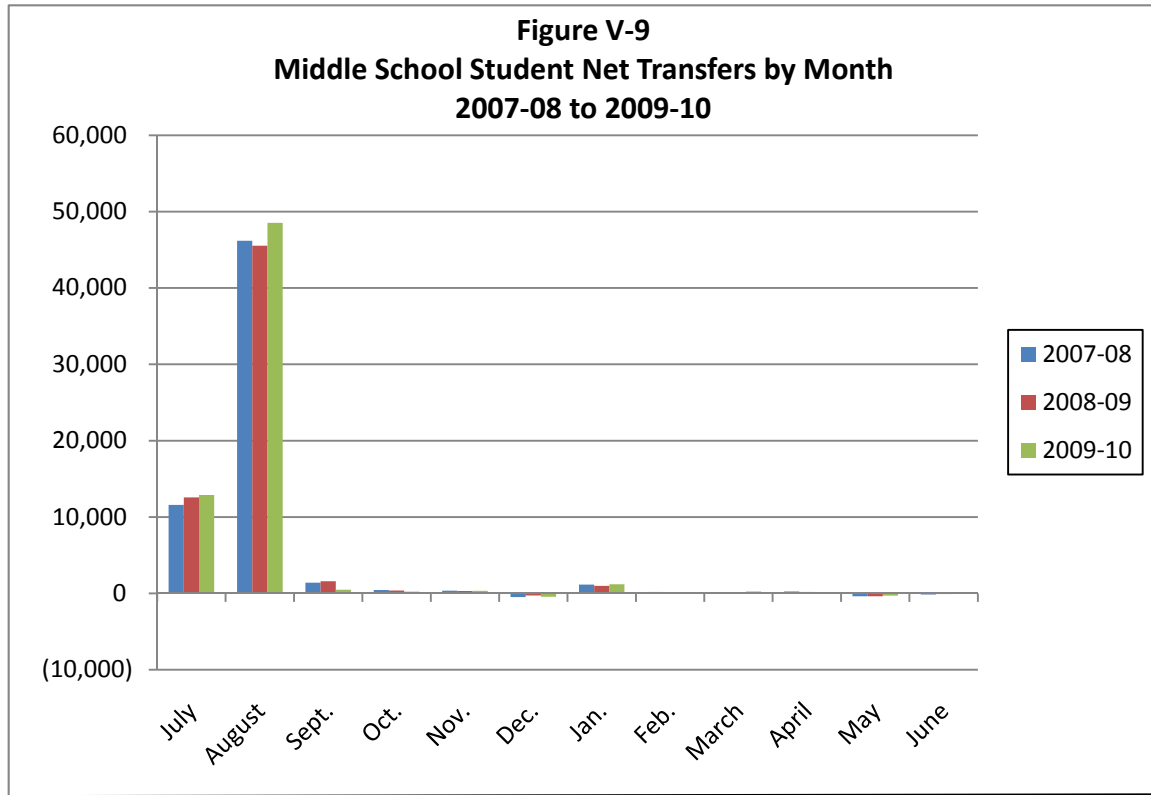
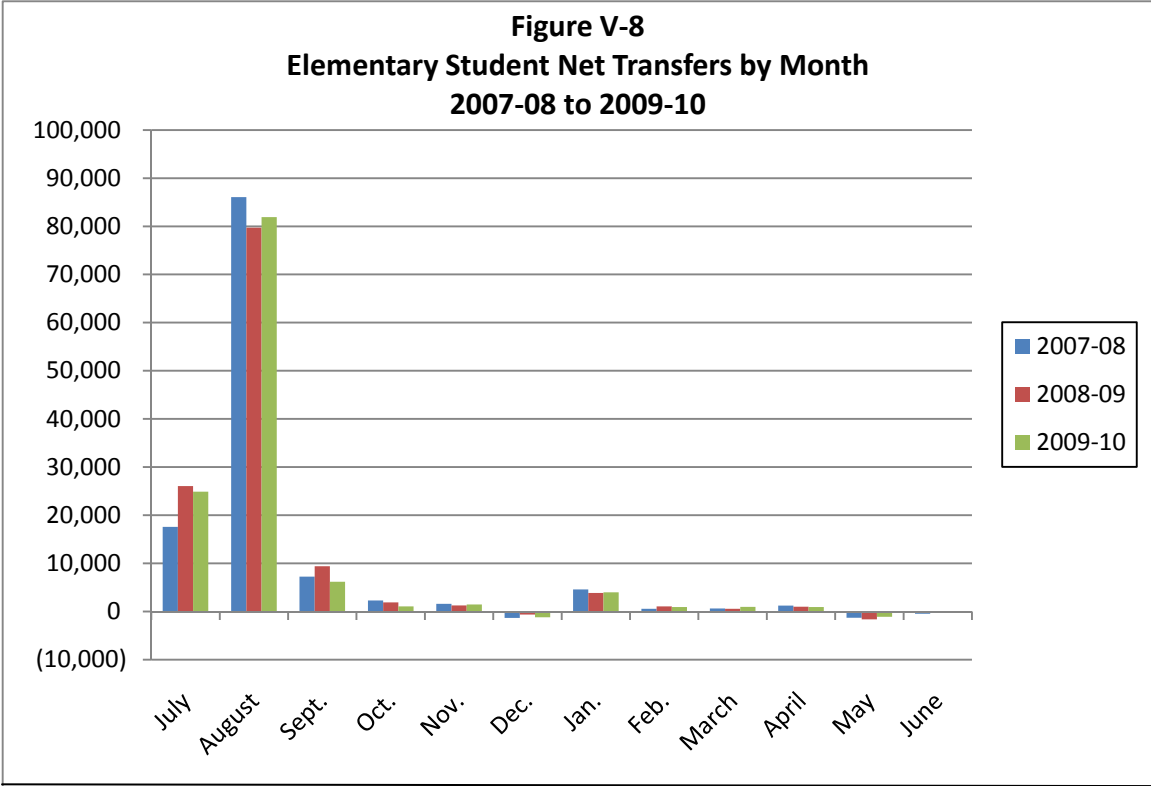
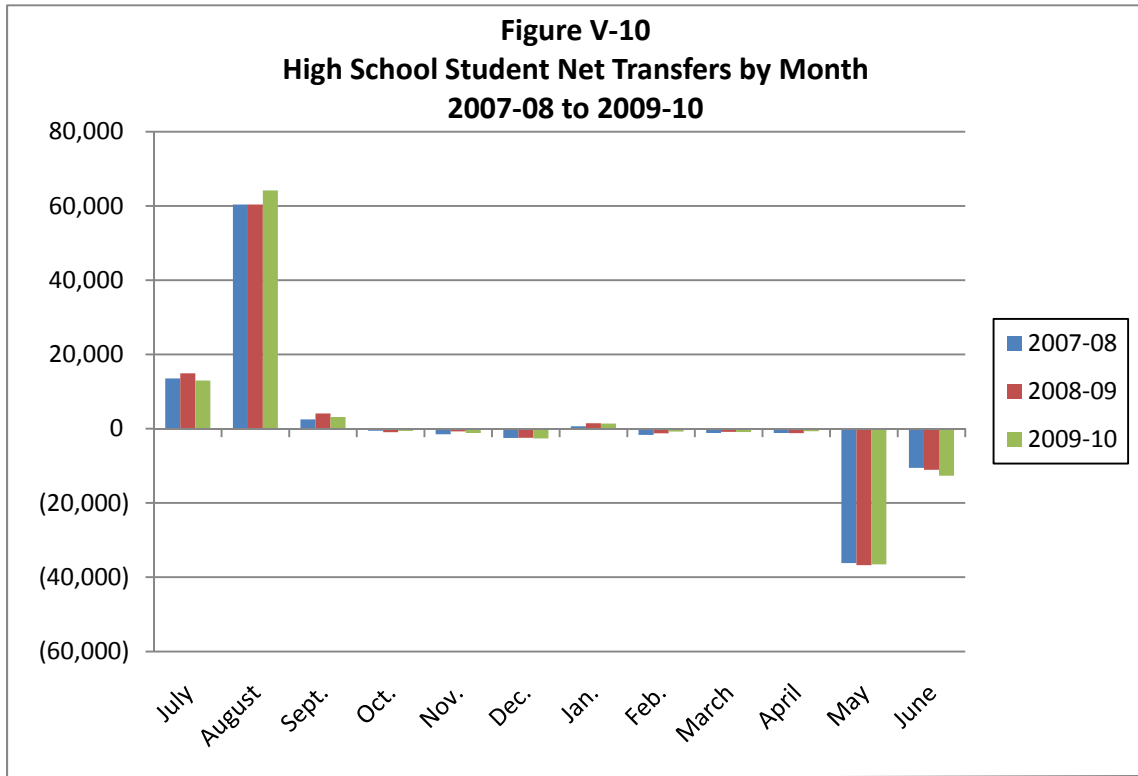
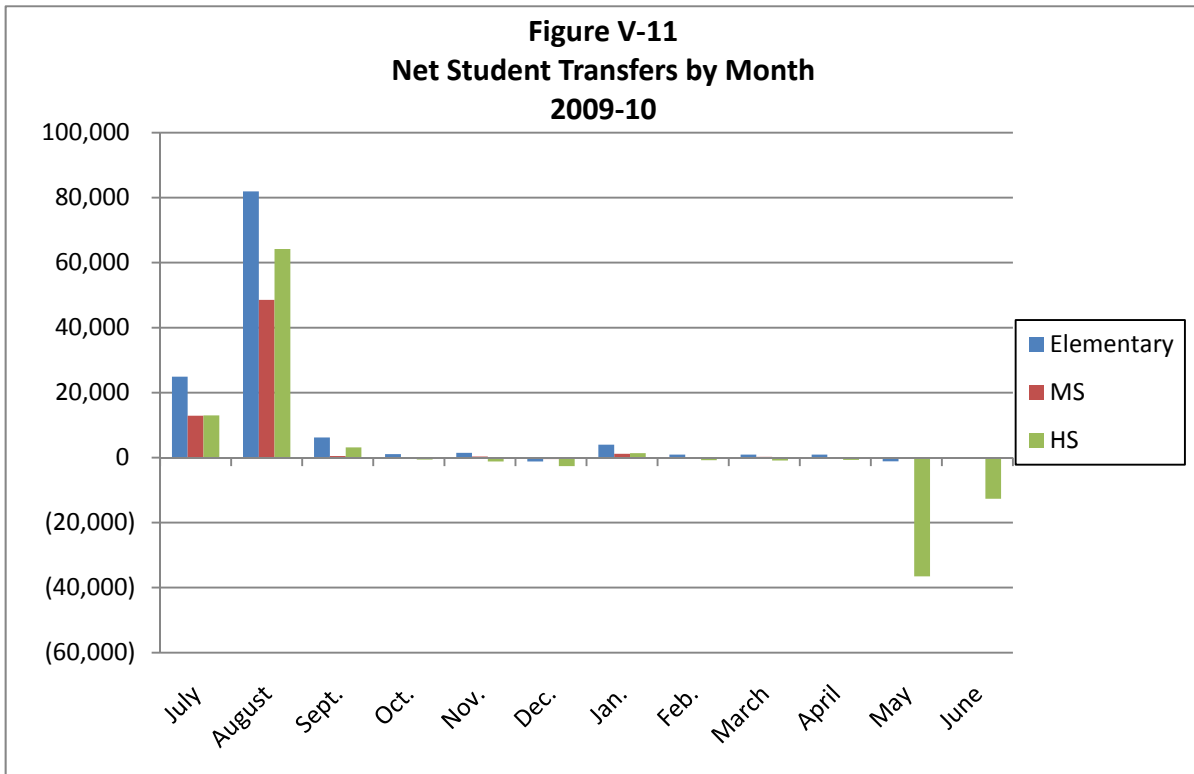


Figure V-8 through V-10 below break out the same data by school level – elementary, middle school and high school. They show that across all school levels, August has the largest number of net transfers into districts, followed by July. The remaining months have relatively small positive or negative net transfers except at the high school level, where May and June show significant net transfers out due to graduation. The number of transfers appears to be quite stable over time, with little significance difference among the three years analyzed here.





Finally, Figure V-10 compares net transfers for all three school levels for school year 2009-10. Again, for all school levels the largest net gain of students occurs around the start of the school year in late summer and fall, peaking in August. The number of students transferring in and out of schools slows considerably after August. Elementary and middle schools continue to experience slight net gains in students in each of the remaining months of the year except for December, May and June. High schools, on the other hand, experience a net loss of students beginning in October and continuing throughout the rest of the school year except for the month of January. The school year ends with large numbers of students exiting high schools due to graduation.



## Key Findings

Based on our analysis of the available data we made the following key findings:

- On average, our estimate of district ADM over the course of a school year is about 2% less than the October count for the same year. This suggests that, on average, enrollments decrease somewhat between fall and spring.
- The range of the differences between districts' October count and ADM is significant, with a maximum net gain in ADM over the October count of more than 27% and maximum net loss of nearly 16%. However, these extremes were found in a relatively few districts (only 12 districts had percentage differences in double digits) and occurred primarily in small districts with enrollments under 500 students. The majority of districts, 129 out of 178, were within one standard deviation (or  $\pm 4.8\%$ ) of the average of 2.1%. The states' largest districts experienced net changes similar to the state average.
- District characteristics such as geographic setting, poverty level, and attendance and graduation rates do not appear to have a consistent, statistically significant affect on the magnitude or direction of the difference between a district's October count and ADM. Still, there is some indication that attendance may have some unsystematic influence and that rural districts may have somewhat higher negative differences on average between their October counts and ADM than districts in other settings.
- Student transfers into and out of districts vary significantly over the course of the year, with the greatest influx of students occurring at the beginning of the school year in July and August and continuing at a much lower rate into September. January also has a small net

positive number of transfers of students into districts. The remaining months experience net negative transfers out of districts, with May and June experiencing the greatest numbers of students exiting districts due to high school graduation.

- Similarly, districts experience their highest enrollment levels in the fall, especially in September and October, with enrollment numbers steadily decreasing monthly as the school year moves into spring.



## VI. Advisory Committee

This chapter describes the work of the advisory committee. The advisory committee for the ADM study was outlined in the enabling legislation. This advisory committee represented a broad range of constituents; a list of member can be viewed in Appendix F. APA worked with the advisory committee members to: (1) set three meeting dates; (2) arrange sites for meetings and conference calling capacity; (3) present information from the information-gathering and analytic tasks APA undertook; (4) develop a set of principles; (5) obtain input from advisory committee members; and (6) obtain input from the public. While APA staffed the advisory committee between December 1, 2010 and January 7, 2011, the advisory committee operated independently and could make its own recommendations.

The committee met three times over the course of six weeks to give input, review material, discuss issues, and present viewpoints. The material presented in this report is the same material that the committee was given during the course of the meetings. The agendas, presentations and materials are posted on the CDE's website. The public was given an opportunity to speak at the end of each meeting to give input or to ask questions.

Over the course of the meetings the committee did recognize the following as important information or items that should be considered in any approach the state might use to count students. This does not necessarily mean that there was consensus among committee members that change was or was not necessary.

1. The committee was charged with looking at enrollment changes from district to district, not looking at enrollment changes from school to school within districts. But, there were committee members who had concerns about district policies for funding schools that did not reflect enrollment growth in schools after the October count. This placed additional burdens on teachers and educational programs for certain students.
2. The committee did agree that having common definitions at the state level around enrollment, membership, attendance and when a student is not enrolled would create clarity and simplicity and not left to variances in the audit process. This consistency would lead to better data being collected and evaluated, ideally saving everyone time.
3. Districts and charters schools are spending large amounts of time and dollars on the October count. With the ongoing reduction of funds consideration must be given to any changes so there is no increase in costs or personnel.
4. There is no research that indicates one system of counting students produces a better academic result than another. It is important that any changes that might be implemented are not counter to the educational aspirations of students or make it harder for students to be enrolled. The attention to students has been strengthened by the implementation of the new accountability and accreditation system (SB 163). This new system looks at high school students and calculates drop out and graduation rates for each district. There was agreement that increasing attendance is important but can also be out of a district's control to fix. There may be

other policies that strengthen the importance of early grades and attendance such as full day kindergarten and preschool.

5. It is important to look at how a change would impact all types of districts including smaller or rural districts and districts that are declining in enrollment or those that are growing. Not all types of districts can be evaluated using the same metrics.
6. Consideration must be given to the potential costs of any change relative to its benefits. Changes should not be made simply to correct problems seen in a few districts or based on very specific issues that have arisen. The data shows only a 2% variance statewide between the October count and ADM. The costs of any change need to be measured against the benefits.
7. Concerns were raised that this is not the year to make any changes, given the ongoing financial issues of the state and the districts. At some point a possible pilot, a new statewide data system and additional revenue for school districts and charters may allow for transitioning over a period of time to a change in student count.

The committee did not forward a recommendation or give direction towards more than the above mentioned items. Some members questioned exactly what the problem or issue was that changing the count process was intended to address, or if changing the count method was the best approach for addressing the problem. There was a desire by some members to change the process to provide financial incentive for districts and charters to take students throughout the course of the year and to better target funding to districts and charters where the students are being served. There was concern that barriers may be in place that are not helpful to students who wish to return to the school after the October count has been taken or after a certain amount of time has passed in the course of a semester or year. Could this be addressed by changing the way students are counted and funded? The committee did understand the complexity of the process, the range of technology issues and the importance of having a strong statewide data system that could pull data from districts.

We thank the committee for tackling this complex issue in a short amount of time which was also during the holiday season.

## VII. Principles and Alternatives

This section of the report will focus on the underlying principles of any student count system, the interrelationship with distribution of state aid and a range of alternatives to consider. The principles and alternatives have been generated based on the district input, other state reviews, other state interviews, data analysis and advisory committee input.

### Principles

A number of principles surfaced we believe should be included in any student count method used in Colorado for school funding. The principles come not just from the work done for this study but also from meetings and input from the advisory committee. Principles that should be included as part of any count method regardless of if a change is made or not include:

- Any student count should limit the administrative burden on the state, school districts, and charter schools.
- The count method should be fair and equitable.
- The counting method should not restrict a district or charter school in terms of calendars, bell schedules, or ability to innovate.

If changes are made to the current count system the following principles need to be addressed:

- The counting method should not result in decreased K-12 funding in the state.
- The counting method should be phased in over time.
- District funding should be held harmless for some period of time if changes to the counting method are adopted.

Additionally our interviews with other states and Colorado school administrators also suggest that:

- Common definitions should be created at the state level for attendance and membership (enrollment). There may need to be a statewide membership form/process to facilitate consistency across the state.
- A strong student information system should be in place. Ideally, this system would allow the CDE to pull the data needed from districts versus the districts pushing data up to the CDE.
- Growth and decline should be addressed as part of the formula if not addressed in the count.

As the alternative recommendations are discussed below, it should be assumed that any implementation of a student count system would adhere to the above principles.

### Alternative Approaches to Count Students

The alternatives focus on the three distinct areas of any funding system: 1) the type of count – attendance vs. membership; 2) the frequency of the count; and 3) how the count is used within the funding system. First described is the range of possibilities that exist within each of the three categories, shown in Table VII-7. Five alternatives are then presented for consideration.

<b>Table VII-1</b>		
<b>Range of Possibilities</b>		
	<b>Current</b>	<b>Range</b>
<b>Type of Count</b>	Attendance	Attendance or Membership
<b>Frequency of Count</b>	Single Day	From Single Day to Daily
<b>Use In Funding</b>		
- <b>Year Used</b>	Current Year	Prior Year to Current Year
- <b>Reconciliation of Funding</b>	Not Within Year	From No Reconciliation to Full Reconciliation

The types of student counts used by states are usually attendance counts or membership counts. Colorado currently uses an attendance count, focusing on the number of students attending schools on the day of the count, or short window of time. The “pro” of an attendance count seem to be the incentive it provides on getting kids into school, which could lead to higher attendance, depending on how often the count is taken. The “cons” of using an attendance count include districts’ lack of control over some attendance issues, such as illness. Also, a single day attendance count can create a very high stakes setting where having students in seats is exceedingly important, even if a window of time is used. In the case of Colorado, this leads to a higher number of students in seats during the attendance window than the state generally has in membership during the rest of the year. Typically membership figures are higher than attendance figures.

One of the main “pros” of using membership include funding districts and charters for the students they are responsible to educate, not just those that attend class on a particular day or window of time. In effect, membership funds districts at the level they would need if every student was in attendance on a particular day. “Cons” of membership possibly include districts not having a fiscal incentive to

encourage or monitor the attendance of students as closely as possible. Districts may also not have an incentive to eliminate students from the membership rolls of the district in a timely manner.

Attendance and membership are the two main ways to count students. They can be used in conjunction with each other and the application of the ways in which they are used can greatly differ based on the frequency of counting students.

The frequency with which states count students for funding purposes ranges from a single day count, such as Colorado's, to daily counts used in states such as Minnesota. A single day count may create a high stakes count that encourages districts to identify every possible student, whether or not it is feasible to continue serving that student, since all funding is tied to this single count. However, the single count does limit districts/charters and states to only undertaking a count once a year. Multiple count dates increase the number of times districts/charters and states have to count students but allow for the examination of attendance or membership trends over a period of time. Multiple counts may alleviate the very high stakes of a single day count but also may increase the number of high stakes count days during the year. States use a range of days from 40 days to every school day when using some sort of "daily" count. Daily counts increase the data points districts/charters and states must account for. It may be that the larger number of days decreases the high stakes nature of each count and leads to a more consistent reporting for each data point. It provides the state with data on the attendance or membership trends for districts/charters at a much finer level of detail. The increased reporting may have an increased cost associated with it.

Once the type of count and frequency of count have been determined, the state must apply the counts to the state funding system. States can choose to use a prior year's count to fund districts in the current school year or use current year count information. Prior year counts allow for more stable state planning since they are working with known numbers going into a school year. In our state interviews, it was mentioned that at least one legislature preferred having the finalized figures and changed their count method to achieve this. However, prior year counts do not account for district/charter changes in enrollment (such as sudden enrollment increases) that may be faced in the current school year and that might entail significant costs.

Current counts allow states to more accurately fund the number of students districts actually serve in any given year. One issue when using current year count is that actual funding counts are not known until sometime during the school year so the state must first fund districts based on estimates for at least part of the year. This is currently true in Colorado and during the district interviews districts mentioned that they had become adept at handling this process. One approach most districts take is to budget on a conservative student count, perhaps even below the state's projected figure, then reconcile early in the school year for differences.

States also must decide if they will use one count to fund or if they will use one count for initial funding and then use an updated count to reconcile funding at a later date reflecting any changes in the count occurring during the year. Colorado already has a form of reconciliation built into its funding system, under which the projected counts used for budgeting in the spring are updated to the actual figures

from the October count and then used to finalize funding for districts. Any state that relies on a count method based on projections for initial funding will need to undertake some sort of reconciliation of funding when actual count numbers are known if it wants current-year funding to reflect actual numbers of students served during the year. The type of reconciliation we will discuss below, related to the alternatives, focuses on reconciling within the school year or at the end of a school year.

Two of the states we interviewed made no funding reconciliation based on changes in student count over the year (beyond some adjustments for growing districts.) Both of these states use prior year counts for funding. South Dakota uses a single day count while Arizona currently uses an ADM count and will be switching to multiple count days. By not reconciling district funding for updated student counts, districts/charters can count on stable funding throughout the school year to support the costs of staff and other activities they believe will be needed to serve students. Holding back a percentage of funding (as is the case in Minnesota) in case student counts come in lower than projected is not necessary. Still, by not reconciling funding, some districts/charters will retain funding for students they did not serve and other districts/charters will go without funding for students they are serving.

The other two states, Minnesota and Nebraska, both reconcile funding based on updated student count information. Minnesota uses a current year projected ADM to begin the funding year and then reconciles funding based on actual ADM at the beginning of the next funding year. Nebraska uses a prior year single day count to project funding and then reconciles the funding based on the actual ADM from the prior year.

One point made frequently by districts and states is that it is very difficult for districts/charters to change staffing levels mid-year. Once staff are hired, the costs are relatively fixed. This means that even if a district/charter is no longer serving a particular student, its costs for serving that student have been locked in through the rest of the school year. Along those lines, it was mentioned frequently that losing one student reduces the cost to the district/charter very little, if at all. The same may be true for a district gaining students; where the marginal costs of adding a small number of students may be minimal.

One concept that is currently used as part of funding in Arizona is to reconcile for funding only for districts/charters where ADM is significantly higher than their ADA. Arizona currently decreases funding for districts/charters where enrollment rate (ADM) exceeds the attendance rate (ADA) by more than 6% (8.5% for high school districts). We suggest that one option for reconciliation may be to take this concept and expand it to only those districts that are far outside the norm. One possibility is to target districts that are 2 or even 3 standard deviations away from the mean. That is, districts that have significant increases or decreases in student count over the school year would be targeted for some type of reconciliation. The state data, as discussed in the section earlier, suggests that most districts are similar in the percent of difference between the single day count and averaged count. This could result in targeting districts with unusual changes up or down. Decisions would, of course, have to be made how to reconcile the funding. The options include only reconciling for districts/charters that have lower final counts than initial counts, rerunning the whole system with the new funding counts, or this third approach of simply reconciling for districts with very high student count change.

Table VII-2 on the next page shows the parameters for five alternatives that are discussed below. Alternative 1 simply stays with Colorado's current model and incorporates the principles described above as best as possible. Alternative 5 is a model that incorporates parameters that are very different from Colorado's current model. The three alternatives in between represent incremental steps from the current Colorado model. For some parameters in some models, the possible choices are listed versus one choice being given. The five alternatives are not the only possible alternatives but allow for the incorporation of a number of combinations of the possible parameters.

**Table VII-2  
Alternative Recommendations**

	<b>Alternative 1 (Current Count)</b>	<b>Alternative 2 (Using Current Data)</b>	<b>Alternative 3 (New Count Dates)</b>	<b>Alternative 4 (Mix Single day with ADM)</b>	<b>Alternative 5 (ADM)</b>
<b>Type of Count</b>	Attendance	Attendance or Membership	Membership	Membership	Membership
<b>Frequency of Count</b>	Single Day	Multi Day Count Using October Count, Safety and Security Count, and End of Year Count	Multi Day Count Using a date in September/ October, November, January, and March (Perhaps incorporate EOY count)	Use Single Day count for initial funding and then reconcile with an average daily count	Average Daily
<b>Use In Funding - Year Used</b>	Current Year	Current or Prior	Current or Prior	Current	Current or Prior
<b>- Reconciliation</b>	Not Within Year	If Current Year - Yes; If Prior Year - Yes or No	If Current Year - Yes, could adjust throughout year; If Prior Year - Yes or No	Yes, could adjust throughout year	If Current Year - Yes, could adjust throughout year; If Prior Year - Yes or No



- Alternative 1 is Colorado’s current funding system. Again, this system uses attendance on a single day (though districts are given a window to prove attendance beyond the single day), uses current year student counts as part of the funding formulas and does not reconcile during the year for a decrease in enrollment but does allow for the legislature to increase funding based on larger than projected enrollment.

Advantages:

- All systems are already in place and state and district staff are familiar with the process
- No potential implementation or additional administrative costs are required
- No funding shifts among districts will result.

Disadvantages:

- The system itself provides no apparent financial incentive to maintain enrollment or attendance after the count date occurs.
  - There is less precision in identifying and funding districts and charters for the students they serve throughout the year.
- Alternative 2 uses current data collections from the CDE to change the frequency to multiple counts. The current October count could be combined with the safety and discipline and/or end of year counts to provide two or three annual student counts. It could continue to rely on attendance or switch to membership for the type of count. This alternative could use prior year counts or current year counts. If prior year counts were used, it would probably not be as important to reconcile funding. If the current counts were used, reconciliation could be done during the year as new counts come in, a single end of year reconciliation could be done, or reconciliation of funding for just districts/charters that are viewed as outliers when it comes to changes in the count over the year. Nevertheless, initial funding would have to be based on some sort of an estimate.

Advantages:

- Provides additional data point(s) later in the year of students being served
- If funding is adjusted based on later count(s), provides funding for students enrolled after the October count period
- May provide additional incentives to keep students enrolled or to enroll students not currently being served
- Relieves some of the pressure of identifying students and assuring attendance for the single October count date.

Disadvantages:

- May increase administrative burdens on the state, districts and charter schools
- May cause further funding disruptions for districts losing students after the October count, particularly if temporary “hold harmless” funding is not available.

- Alternative 3 is much like alternative 2 but instead of just using currently collected data, it incorporates new dates into the system to create 4 or 5 count dates. It might be possible to incorporate the current October count date, the safety and security information and the end of year information into this alternative and just add two new dates, or more new dates could be added. If this is adopted we suggest a switch to membership once the larger number of counts becomes incorporated. This alternative could use prior year counts or current year counts. If prior year counts were used it would probably not be as important to reconcile funding. If the current counts were used, reconciliation could be done during the year as new counts come in, a single end of year reconciliation could be done, or reconciliation of funding for just the outlying districts/charters could be done.

Advantages and disadvantages similar to Alternative 2

- Alternative 4 incorporates two different types of counts into one alternative. Much like the Nebraska system described earlier in this report, this system would use both the single date and average daily student counts. Membership would be used for both counts. Prior year or current year data could be used in this model. The prior year funding might not need to be reconciled unless the single count is used as the starting point for funding. Funding with current year counts could be reconciled during the year as new counts come in, a single end of year reconciliation could be done, or reconciliation of funding for just districts/charters that are viewed as outliers when it comes to changes in the count over the year.

Advantages and disadvantages similar to Alternatives 2 and 3

- Alternative 5 completes the switch to a full ADM system, using an average daily count with membership as the type of count. The reconciliation process options are very similar to alternatives 2, 3 and 4 and depend on if a prior year or current year count is used.

Advantages and disadvantages similar to Alternatives 2 – 4 with the addition of:

- A full ADM count may require more significant upgrades to the student information systems of the state and districts, thus increasing implementation costs.
- Greater count discrepancies from the current October count may occur in some districts, leading to larger decreases in funding.

## Simulation

As part of this study, we were asked to simulate the possible funding affects for districts if an alternative student count were adopted. With limited time and information for analyzing the possible effects of each of the possible alternatives, we limited our simulation to the ADM count data estimated for each district as described in the analysis section. For this simulation, we converted the current October count data used in the CDE's funding model to an ADM count by applying the districts' percent change from their October count to ADM to each of the count parameters used in the simulation. We used the CDE's file "Fiscal Year 2009-10 District Funding Calculation Worksheet" from the department's website to run the simulation.<sup>12</sup>

The first step to model the effects of using the ADM figures was to adjust all the student count figures in the simulation by the percent changes for each district derived in the data analysis section based on the three year average difference between October counts and the ADM figures. Next, since the statewide average student count went down using the ADM count, the per pupil funding figures were adjusted up proportionately to hold the total statewide funding amount constant. This ensured that the principal of no loss of K-12 funding in the state was met.

Though statewide total funding was unchanged, the change in student counts resulted in shifts in the allocation of funding among districts. The state funding formula is a complex formula with a number of interactions between the various formula components and factors. Because of this, it is not possible to simply assume that if a district had a larger than average difference between its October and ADM counts that its change in funding would simply be the same percent difference. As student count figures changed, the complex interactions within the formula also changed (for example, the change in student count in a district could affect the size adjustment the district receives). After running the adjustments to the simulation described above we found that 15 districts had a loss of funding of 5.0% or more and two districts experienced loses of over 10%. These 15 districts had ADM counts on average 10% below their October counts, or 7.9 percentage points below the 2.1% average decrease. Sixty-three districts had decreases in funding of between 0.0% and 4.9%. Eighty-six districts saw increases in funding of between 0.0% and 4.9% and another 15 districts saw increases in funding of 5.0% or more.

The simulation illustrates that changes to the student count can have significant effects on a district by district basis, even when total statewide funding is held constant. It also shows that to adhere to the hold harmless principle stated above, additional funding would be required as part of any phase-in of a new system.

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<sup>12</sup>The Excel simulation workbook may be found at <http://www.cde.state.co.us/cdefinance/SchoolFinanceFundingFY2009-10.htm>

## VIII. Recommendations

This final chapter will focus on the recommendations stemming from the study. The recommendations are those of the consultants and do not come from and are not meant to represent the views of the advisory committee. The recommendations were developed based on the work done including the district and state interviews, online survey, advisory committee input, and data analysis. The recommendations go beyond the basic principles discussed in the above chapter but the principles inform the recommendations where appropriate. Some of the principles are, at least partially, reflected in these recommendations. We believe that some of the recommendations would need to be implemented as prerequisites for others, and this is referenced where appropriate.

During the study process it was apparent that under the current fiscal situation the state, districts and charter schools were understandably very concerned about any additional costs of implementing and administering a new or revised count method. We agree that the budgetary impact of any proposed changes should be given serious consideration given the current fiscal climate, and to the extent possible additional funding should be provided to offset these costs. Alternatively, the state may consider phasing-in or delaying any or all of the recommendations that will impose additional costs until state and local budgets have become stabilized and implementation can be carried out in a way that complies with the principals stated in the section above.

### Definitions

We find that the state needs to establish or clarify common definitions in a number of areas to ensure an efficient and effective student count process going forward. This is true if changes are made to the current system or not. Definitions for both attendance and membership should be made clear and be implemented consistently state wide.

**We recommend that the state clarify the definition of an enrolled student by setting a statewide standard for the number of days of unexcused absences allowed before a student must be taken out of district membership.**

While there are consistent procedures across districts for when a student is entered into enrollment, when students are considered withdrawn from enrollment is currently treated differently across the state. We believe this change should be made even if no other changes are made to the current October count system. This becomes even more of a priority if membership (rather than attendance) is adopted as the basis of the student count for funding. Currently, districts remove a student from their enrollment rolls when they are notified of the withdrawal by parents, social service agencies, or by a records request for that student from another education service provider. But, in cases where a student simply stops attending some

districts will withdraw the student after a certain number of days while others will retain the student in enrollment until the next October count. Our study found that a number of districts here in Colorado, and other state departments of education, set a common standard, typically between 10 and 20 days consecutive unexcused absences, for when a student should be withdrawn from enrollment. We recommend that a similar common standard for the withdrawal of a student be adopted in Colorado.

Several district administrators expressed concern that withdrawing a habitually absent student from enrollment, especially a secondary student, may create additional administrative barriers to re-enrolling a returning student. We believe the CDE should review this issue and work to eliminate administrative roadblocks to both producing an accurate and consistent enrollment count and to accommodating students who wish to return to school and complete their education. It is important to also increase the state's focus on truancy prevention programs with consistent funding. This will enable districts to continue to try and bring the students back into the system. A count system should not deter from the educational mission of school districts or charters and unintentionally create barriers for students.

**We recommend changing the increment in which students are counted from halves to quarters or fifths.**

Currently the system counts students, for both attendance and membership, as either half-time or full-time. Changing the increment to quarters or fifths may be more appropriate to allow for a more precise accounting of students. For attendance this would allow students to be considered as more than just attending half-time, attending full-time or being absent. For membership, this would allow districts to be funded more precisely on the amount of time they are serving any given student. This may also facilitate the accounting of students enrolled in alternative educational programs such as concurrent enrollment and on-line.

**We recommend that work be done to strengthen and clarify the definitions surrounding alternative instructional opportunities.**

On a number of occasions we heard about the difficulties encountered in accounting for students enrolled in alternative instructional programs such as concurrent enrollment, online, or homeschooled students who are enrolled in a district school for a few classes each day or week. We believe that some of the definitional changes described above will help, but more work may be needed. In the case of online, each of the four states we talked to discussed struggles with the counting of these students. We believe that strengthened definitions and accounting procedures should be developed collaboratively by the state, districts, and charters.

## Student Data System

**We recommend that the CDE implement a statewide real-time student data system that ensures full compatibility with all districts and allows student data to be “pulled” from districts versus having districts “push” data up to the state.**

Our work showed that most districts, and the charter schools we spoke with, have data systems that currently allow them to track attendance and membership frequently, often on a daily basis. It appears that the basic student data needed for conducting most common student count methods is already collected at the district and charter school level. At this time, these data are not necessarily collected consistently across the state, but if the definitions described above are adopted and incorporated into the state’s student data collection process, we believe that the quality and reliability of the data will be improved.

Still, districts currently have to “push” the data up to the state at certain intervals. This means district staff time is required several times a year to collect and prepare the required data in a format mandated by the state. Issues, such as dropped data or lost connections, also arise as districts try to upload these data to the state. Many districts work regularly with the state to overcome problems with data transfer. A statewide real-time student data system would allow the state to pull needed data from any district at any time. As districts updated student level data these data would filter up to the larger statewide system automatically. This type of system should also eliminate the need for districts to report similar data on more than one occasion. Instead, data would be real time and the state would have the most updated data on all students. In order for the system to work, district and charter school systems would need to be fully compatible with the state system and a process may need to be created to ensure that vendors’ products are compatible.

The federal Statewide Longitudinal Data Systems grant awarded to CDE last spring will be used in part to take a few steps toward streamlining student data reporting in the state. CDE plans to update its student data reporting systems so that most student data elements will only need to be reported once per year, with subsequent reporting only required for changes in the data.

## Count Verification and Audit Procedures

**We recommend that the current procedures used to verify student counts and the audits of those counts be reviewed to ensure they put the least burden possible on districts and charter schools while still enabling the state to adequately verify student count data.**

During our work we consistently heard from districts and charter schools that the current level of work around the October count can be arduous. Districts must invest considerable staff time

annually to ensure staff working with the count understand what, when and how information must be collected and reported to the CDE to ensure that students are properly counted and that appropriate documentation is retained to verify each student's enrollment and attendance for the audit process that is undertaken in every district approximately every three years. The creation of clear definitions described above, especially for students in alternative instructional situations, may help to alleviate some of this administrative burden. We believe a more thorough review should be done to make sure the verification and audit processes are the most efficient possible. Part of the review should focus on the type of information districts are required to collect and how this information must to be stored, particularly with regard to whether physical or electronic versions are sufficient. The districts that we interviewed noted that maintaining large amounts of paper files for each year's student count was creating a burden both in terms of space and cost.

None of the states we spoke with for this study required audit processes as extensive as Colorado's. In fact, three of the states had almost no state audit process but instead relied on the annual financial audits conducted by private CPA firms for districts. Another state, Minnesota, audits about 25% of districts each year, targeting some of these audits for districts with identified count issues.

We believe some level of audit is necessary given the large amounts of funding associated with the student count. In talking to CFOs from around the state, it was expressed that adding auditing of student count procedures to the annual financial audit may not be feasible due to a shortage of qualified CPA firms, especially in rural areas of the state. Still, we feel this is an option that should be explored further, both in terms of the extent of the role the annual district financial audits should play in verifying student counts and what the additional costs may be and how they would be paid for.

We also believe the CDE should re-examine whether it is necessary to audit each year's student count in every district. Currently, some districts are audited annually and others every three years, but these triennial audits examine student count data for each of the previous three years. The state should examine moving to a system similar to Minnesota's, where only a certain percent of districts are audited each year and where a greater focus is placed on those districts with known student count issues. We further recommend that the audits be broken up into three groups: 1) audit all districts on a rotating schedule, perhaps every 3-5 years (with only one year of student count information being audited each time); 2) select a certain number of districts randomly each year for audits so that districts are aware that any student count could be audited in any given year; and 3) perform targeted audits for districts that have been identified as having an issue with their counts such as past discrepancies in counts or odd data within a given year.

We believe that the current level of work required for the October count should not be replicated for additional count days. The level of verification and documentation required presented a significant barrier to stakeholders' even considering student count alternative that

would require additional counting and/or reporting days. If the verification and audit processes can be streamlined, we believe there may be greater acceptance on the part of districts and charter for expanding the number of count dates used.

## **Adding one or more count days and adopting membership as the basis for the count**

**We recommend that the state adopt a membership-based count and consider adding an additional count day or multiple days to the count process.**

Colorado's current student count relies on what some describe as an attendance count on October 1<sup>st</sup>. In reality, the count is applied in a way that more closely resembles a membership rather than an attendance count. This is due to the fact that districts are allowed to prove attendance over a few week period for those students not in attendance on October 1. In effect, this creates a count that resembles a membership count. Even if the state continues with a single day count, switching to membership could eliminate the need for a counting window and allow data to simply be collected on the October count day.

We believe that adopting a membership-based count, particularly if one or more additional count days are required, may lessen the high stakes nature of the single count day, since districts will be assured of funding for students who enroll in the district at any time during the school year, or at a minimum during the period of time covered by the count dates. This would serve to eliminate the large push districts feel they must make to ensure that every student is in a seat and accounted for on a single day. The advantages of moving to a membership count with multiple count days include:

- Adding one or more count days later in the school year may provide an additional financial incentive for districts to keep students enrolled and perhaps to improve attendance if the state also adopts a standard for withdrawing students with a certain number of unexcused absences;
- The allocation of school funding will more closely reflect the distribution of students being served in districts over the course of the school year. One or more additional count dates will allow the CDE to capture the movement of students in and out of districts during the school year and permit adjustments to funding to reflect this movement. Depending on the type of funding reconciliation rules the state would adopt, additional funding could flow to districts that experience a net increase in students from fall enrollment and funding could be reduced in districts that experience a net loss of students. In our analysis of student count policies in other states, we found that some states only adjust for enrollment increases while others adjust in both directions. States also differed in whether the funding adjustments were made in the current year or in the subsequent school year. Funding adjustments could also be



limited to districts whose enrollment change from one count to the next exceeded a certain threshold, for example one standard deviation away from the state average change, or some percentage above the state average.

- A potentially standardized and simplified paper trail for documenting enrollment as opposed to what is currently required for verifying attendance on any given day;

In order to minimize additional costs, we would recommend that the CDE explore using the data collected by the Safety and Discipline and End of Year counts as additional membership counts for funding. This would reduce the burden of adding an entirely new data collection date. Over time, if large changes are seen in the count figures, additional dates or even an average daily count could be implemented. Given the initial uncertainty districts would experience while undergoing the transition to a new count method, we would suggest that reconciliation of district funding only occur for districts with growth and for those with falling student counts well outside the average for the state or for some comparable cohort of districts. These cohorts could be based on enrollment size, concentration of poverty, setting, or some combination of all of these characteristics.

DRAFT

## APPENDIX A

### STATES STUDENT COUNT METHODS

<b>STATE</b>	<b>TYPE OF COUNT</b>	<b>ATTENDANCE VS MEMBERSHIP</b>
Alabama	AVERAGE	MEMBERSHIP
Alaska	AVERAGE	MEMBERSHIP
Arizona	AVERAGE	MEMBERSHIP
Arkansas	AVERAGE	MEMBERSHIP
California	MULTIPLE COUNTS	ATTENDANCE
Colorado	SINGLE COUNT	ATTENDANCE
Connecticut	SINGLE COUNT	ATTENDANCE
Delaware	AVERAGE	MEMBERSHIP
Florida	AVERAGE	MEMBERSHIP
Georgia	MULTIPLE COUNTS	MEMBERSHIP
Hawaii	AVERAGE	MEMBERSHIP
Idaho	AVERAGE	ATTENDANCE
Illinois	AVERAGE	ATTENDANCE
Indiana	AVERAGE	MEMBERSHIP
Iowa	SINGLE COUNT	ATTENDANCE
Kansas	SINGLE COUNT	ATTENDANCE
Kentucky	AVERAGE	ATTENDANCE
Louisiana	MULTIPLE COUNTS	MEMBERSHIP
Maine	MULTIPLE COUNTS	ATTENDANCE
Maryland	SINGLE COUNT	MEMBERSHIP
Massachusetts	SINGLE COUNT	MEMBERSHIP
Michigan	MULTIPLE COUNTS	MEMBERSHIP
Minnesota	AVERAGE	MEMBERSHIP
Mississippi	AVERAGE	ATTENDANCE
Missouri	AVERAGE	ATTENDANCE
Montana	MULTIPLE COUNTS	MEMBERSHIP
Nebraska	AVERAGE	MEMBERSHIP
Nevada	SINGLE COUNT	MEMBERSHIP
New Hampshire	AVERAGE	MEMBERSHIP
New Jersey	SINGLE COUNT	MEMBERSHIP
New Mexico	MULTIPLE COUNT	MEMBERSHIP
New York	AVERAGE	ATTENDANCE
North Carolina	AVERAGE	MEMBERSHIP
North Dakota	AVERAGE	MEMBERSHIP

Ohio	AVERAGE	MEMBERSHIP
Oklahoma	AVERAGE	MEMBERSHIP
Oregon	AVERAGE	MEMBERSHIP
Pennsylvania	AVERAGE	MEMBERSHIP
Rhode Island	AVERAGE	MEMBERSHIP
South Carolina	AVERAGE	MEMBERSHIP
South Dakota	SINGLE COUNT	MEMBERSHIP
Tennessee	AVERAGE	MEMBERSHIP
Texas	AVERAGE	ATTENDANCE
Utah	AVERAGE	MEMBERSHIP
Vermont	AVERAGE	MEMBERSHIP
Virginia	AVERAGE	MEMBERSHIP
Washington	MULTIPLE COUNT	MEMBERSHIP
West Virginia	SINGLE COUNT	MEMBERSHIP
Wisconsin	MULTIPLE COUNT	MEMBERSHIP
Wyoming	AVERAGE	MEMBERSHIP

## APPENDIX B

### State Interview Protocol

1. Please describe your states current system for counting students as part of the state school funding formula?
2. If the state uses Membership then: What is the state's definition of membership?
  - a. What procedures do you have in place for determining when a student is enrolled or unenrolled, e.g. is there a form, codes entered into the student record database or some other recordkeeping method?
  - b. Are these definitions and procedures standardized across districts or does each district develop its own or are they dictated by your information systems vendor?
3. If the state uses Attendance then: What is the state's definition of attendance?
  - a. Does the state have specific definitions for tardy, half day and full day?
    - i. Do these differ for elementary schools and secondary schools?
4. Does the state have a minimum number of contact days or hours for students?
5. What are the procedures for collecting student count information?
  - a. How much time does it take for state staff?
  - b. What type of hardware and software requirements does the state have to undertake the count?
  - c. Does the state undertake different counts during the year?
  - d. Are there procedure manuals or other information available describing these procedures?
6. How does the state's system track students in alternate settings such as concurrent enrollment or online?
7. Are there compatibility issues between the department and districts? If so, how extensive are they (in terms of the severity of the technology issues? What will it take to solve this problem? Can you estimate the costs of doing this?
8. Do you have an understanding of the current administrative costs to districts of collecting current count data in terms of number of staff required? Total staff time? Other administrative costs (material, equipment, travel, communications, reporting, training for district and school staff)?
9. Does the state see changes in enrollment and attendance change over the course of the school year in your district?
10. Any other comments or concerns?

## APPENDIX C

### Questions for Districts/Schools

1. Does your district currently have a definition of an enrolled student?
  - a. Under what conditions is a student considered enrolled or unenrolled (withdrawn)?
  - b. What procedures do you have in place for determining when a student is enrolled or unenrolled, e.g. is there a form, codes entered into the student record database or some other recordkeeping method?
  - c. Are these definitions and procedures standardized across districts or does each district develop its own or are they dictated by your information systems vendor?
  
2. How does your district define attendance? What fraction of a day must a student attend to be considered in attendance?
  - a. Is this a standardized definition used statewide or is it unique to your district?
  
3. By state law, districts must provide 990 hours of instruction annually at the elementary level and 1,080 hours of instruction at the secondary level. Does your district provide more than the minimum hours of instruction at either or both levels?
  - a. If so, how many hours of instruction do you offer:
    - i. Elementary:
    - ii. Secondary:
  
4. How does your district/school collect current student count data, including the October count, attendance data and the unaudited ADA counts reported to CDE?
  - a. What are the different counts collected and for what purpose(s) are they used?
  - b. What specific data elements are collected for each?
  - c. What is the calendar for this data collection?
  - d. Does your district collect only the student count data required by the CDE and federal DOE or does it collect additional data for internal purposes?
  - e. What procedures do school staff follow? What procedures do district staff follow? Do they differ by school level?
  - f. What reporting procedures are in place for current counts? For example, how do schools report these data to the central office and how does the central office report these data to CDE?
  - g. Are there procedure manuals or other information available describing these procedures?
  - h. What auditing procedures, if any, are in place for each count?
  - i. What training does your district or the CDE provide to district and school staff on student count procedures? What does it look like?
  
5. How does your district handle special cases under the current count system, for example concurrent enrollment, online, facility, early childhood special education, tuition, year-round, or summer school students? Any other types of students to be concerned about?

- a. What issues with counting these types of students would you anticipate if an alternative count method such as ADM is implemented?
6. What data systems are currently in place in your district for collecting current student count data?
  - a. Both hardware and software
  - b. Are these systems adequate for the data processing needs required for the current count data collection?
    - i. If not, what upgrades/improvements are needed?
  - c. Can these systems be upgraded or adapted for the collection of ADM or other alternative student count data?
    - i. If not, why?
    - ii. If your district contracts with a data systems vendor or consortium, would this relationship impede your district's ability to change or upgrade your system to accommodate an alternative count method?
    - iii. If your district's data systems can be upgraded or adapted, what upgrades are required? Would this work be carried out internally or by a contractor/vendor? Do you have, or can you develop an estimate of the costs? How long do you think it would take to make these changes?
7. Are there compatibility issues between your data system and CDE's? If so, how extensive are they (in terms of the severity of the technology issues? What will it take to solve this problem? Can you estimate the costs of doing this?
8. What are the current administrative costs at your district/school of collecting current count data in terms of number of staff required? Total staff time? Other administrative costs (material, equipment, travel, communications, reporting, training for district and school staff)? Can we get specific budget information on this?
  - a. Any estimate of anticipated changes in costs if an ADM based count is implemented (again in terms of staffing, materials, communications, etc.)?
  - b. How long would it take for your district to implement an ADM based count method?
9. How does student enrollment and attendance change over the course of the school year in your district?
  - a. Is enrollment stable over the course of the year or do you have moderate to high student mobility?
  - b. Considering the past 5 years, at what point of the year is your enrollment count the highest, e.g. fall, winter, spring?
  - c. What is the typical or average variation between high and low enrollment points?
  - d. Has the time of year and the magnitude of enrollment variation been consistent over the past 5 years or do they vary from year to year?

10. What other impressions or concerns do you have about moving to an alternative student count method, particularly ADM?
11. Any other comments or concerns?
12. Do you have data on student enrollment and attendance that you would be willing to share with us for the purpose of estimating the impact of alternative count methods on your district's student counts and funding?



**APPENDIX D**

**District Survey**

**[beginning following page]**

## 1. APA Average Daily Membership Survey

The consulting firm of Augenblick, Palaich and Associates, in collaboration with the Colorado School Finance Project and the Buechner Institute for Governance at the University of Colorado Denver, has been hired by the Colorado Department of Education to conduct a study into the feasibility, impact and costs of adopting an Average Daily Membership method of counting students for district funding purposes. It is unknown what, if any, changes will be made to the current student count, but having district level information will help to inform this analysis. This study was mandated by the legislature last year in Senate Bill 10-008.

The purpose of this online survey is to gather input from districts about the processes you use to record and report student enrollment changes internally, the administrative effort and costs required to conduct the current October student count, the capabilities of your student information systems, and other concerns or insights you may have regarding methods for counting students for funding purposes. The information you provide will be invaluable for informing the work of this study.

Participation in this study is voluntary and confidential. No individuals, schools or school districts will be identified in the study's final report or in related discussions or testimony. This online survey invitation is being sent to all district superintendents and business managers in the state. We estimate that completing this survey should take no more than 20-30 minutes.

To take the survey, please click on the "Next" button below. To move forward or backward through the survey, click on the "Next" or "Prev" buttons at the bottom of each page.

When you have completed the survey please click the "Done" button. Please complete and submit the survey only once.

Thank you for your help with this important work!

**1. How do your schools in your district report student enrollment changes (e.g. new enrollments, withdrawals, re-enrollments, etc.) to the central office?**

Administrators or teachers report enrollment changes electronically via access to the district's electronic student database on school computers

Administrators or teachers report enrollment changes to the central office via paper forms

Other (please specify)

**2. How do schools in your district report student attendance to the central office?**

Administrators or teachers report attendance electronically via access to the district's electronic student database on school computers

Administrators or teachers report attendance to the central office via paper forms

Other (please specify)

**3. If schools in your district use computers to electronically report enrollment and/or attendance changes to the central office, do these school-based computers currently encounter any compatibility issues with your district's central student information system?**

No compatibility issues

Minor compatibility issues

Moderate compatibility issues

Severe compatibility issues

Our schools do not report enrollment or attendance changes electronically

**4. How often does your district update its student information database for changes in enrollment (e.g. new entries or withdrawals)**

Daily

Several times per week

Weekly

Other (please specify)

### 3. October Count Administration

**1. In a typical year, how many weeks are required to develop, verify and report your district's October student count to the Colorado Department of Education (CDE)?**

- Less than a one week
- At least one week but less than two weeks
- At least two weeks but less than three weeks
- At least three weeks but less than four weeks
- At least four weeks but less than five weeks
- At least five weeks but less than six weeks
- More than six weeks

**2. In a typical year, how many staff dedicate a substantial portion of their day over the period of time you selected in the above question for developing (including providing technical assistance to schools), verifying, and reporting your district's October student count?**

- Less than 1 staff person
- 1 to 2 staff persons
- 3 to 4 staff persons
- 5 to 6 staff persons

If more than 6 staff persons, please enter the number of staff:

**3. In a typical year, how much time do staff in your district spend on verifying student enrollment changes (e.g. verifying residency of new students; verifying placement of withdrawn students in other districts, schools or programs; etc.)?**

- Less than 1 day
- At least 1 day but less than 1 week
- At least 1 week but less than 2 weeks
- At least 2 weeks but less than 3 weeks
- At least 3 weeks but less than 4 weeks

If 4 or more weeks, please enter the number of weeks:

**4. In a typical year, how many staff in your district engage in training related to conducting the October student count?**

1 staff person

2 to 3 staff persons

4 to 5 staff persons

If 6 or more staff persons, please enter the staff:

**5. In a typical year, how much time do the staff included in the previous question above spend on training related to conducting the October student count? Please report the total time for all staff involved in the training. (For example, if you selected 2 to 3 people and they spent a total of 3 days in training, one day for each of 3 people, please select: At least 3 days but less than 4 days.)**

No time is spent on training

One-half day or less

At least one-half day but less than 1 full day

At least 1 day but less than 2 days

At least 2 days but less than 3 days

At least 3 days but less than 4 days

At least 4 days but less than 5 days

If 5 days or more, please enter the number of days:

**6. Who provides the October student count training to your district's staff? (Please check all that apply)**

In-house by the district

Colorado Department of Education

Your student data system vendor

Other (please specify)

**7. What would you estimate to be the total average annual cost of developing, verifying and reporting your district's October student count, including staff salaries and benefits, hardware, software maintenance costs, materials, technical assistance, and training?**

Less than \$10,000

Between \$10,001 and \$50,000

Between \$50,001 and \$100,000

More than \$100,000

## 4. District Student Information System

**1. Is the student information system your district uses for developing and reporting the October student count capable of automatically handling special enrollment situations such as concurrent enrollment with a post-secondary institution, concurrent enrollment with another school or elementary/secondary education provider, online enrollment, etc.?**

Yes

No

In some cases, please specify:

**2. Does your district's student information system compute Average Daily Membership (ADM):**

On a daily basis

On a weekly basis

On a monthly basis

On an annual basis

All of the above

Our data system does not compute ADM

**3. Does your district's student information system compute Average Daily Attendance (ADA):**

On a daily basis

On a weekly basis

On a monthly basis

On an annual basis

All of the above

Our data system does not compute ADA

**4. What student information system does your district use?**

Infinite Campus

Go.edustar

District does not have a student information system

Other (please specify)

**5. Does the maintenance contract with your district's student information system vendor include:**

- Minor reprogramming for changes in state law/procedures
- Major reprogramming for changes in state law/procedures
- Both Minor and Major reprogramming
- Does not cover reprogramming for changes in state law/procedures
- Our district does not have a student information system maintenance contract

**6. Does your district's student information system experience any compatibility issues with submitting student data to the Colorado Department of Education? (For example: your student data must be significantly reformatted for submission to CDE, data transmissions are interrupted or dropped, errors occur during transmission, your data system required additional programming or modules to successfully interact with CDE)**

- No compatibility issues
- Minor compatibility issues
- Moderate compatibility issues
- Severe compatibility issues



## 5. Attendance and Instructional Time

**1. How frequently do schools in your district take attendance throughout the school year?**

Daily

Weekly

Monthly

Quarterly

Our schools do not take attendance regularly

Other (please specify)

**2. Does your district provide more than the state minimum number of hours of instruction for elementary schools (990 hours annually)?**

Yes

No

**3. Does your district provide more than the state minimum number of hours of instruction for secondary schools (1,080 hours annually)?**

Yes

No

**4. If you answered Yes for either elementary schools or secondary schools on the previous questions, how many hours of annual instruction does your district provide?**

Elementary

Secondary

**5. What do you think are the advantages and disadvantages of maintaining the current single October Count method of counting students for district funding purposes?**

**6. What do you think are the advantages and disadvantages of changing to an Average Daily Membership method of counting students for district funding purposes?**

**7. Do you have any other comments or concerns about counting students for funding purposes?**

	5
	6

## 6. District Information

1. School District name:

2. School District number:

**7. Thank you for taking the survey, we appreciate your participation.**

## Appendix E

### CDE EOY File Student Entry and Exit Codes Used in Transfer Analysis

#### Entry Codes:

01 - New to educational system. A student who has no prior formal educational experience (i.e. a student who is new to formal education).

06 - K-6 student entering from an unknown educational setting/status. Applicable only to students in grades K – 6. This entry code can be used if the reporting district does not know the most recent educational status (i.e. last school attended) of an entering student.

12 - Transfer from a detention center within district. A student who was previously receiving an education program at a detention center within the reporting district.

13 - Transfer from a public school in a different Colorado school district or BOCES. A student who transfers from a public school that is located within a different school district within Colorado (includes students transferring from a detention center operated by another Colorado school district).

14 - Transfer from a school located in a different state/country. A student who transfers from a public school located in another state or country.

15 - Transfer from a non-public school. Student who transfers from a non-public school.

16 - Transfer from home-based education (home schooling). A student who transfers from a home-based education (home-schooled) environment.

18 - Transfer from a Career and Technical (vocational) Education Program not administered by a Colorado School District or BOCES. A student who transfers from an occupational training program, recognized (but not administered) by the school district that leads to a certificate or other evidence of completion.

19 - Transfer from a Licensed Eligible Facility or State Operated Program and was attending an on-grounds school. Student is publicly placed in and is attending an on-grounds educational program in a licensed facility (e.g. Residential Child Care Facility – RCCF, hospital), or in a state-operated program (e.g. Colorado School for Deaf and Blind, Pueblo Mental Health or Ft. Logan Mental Health).

21 - Transfer from a facility operated by the Department of Corrections or Division of Youth Corrections. Student was previously incarcerated in a correctional facility.

25 - Return after an extended absence. Student returns after missing 10 or more consecutive days of school. Applies whether the absence was excused or unexcused.

30 - Re-entry to same school district after prolonged illness/injury – A student who had previously entered a school and then re-enters a school in the same school district after he or she left school because of a prolonged illness or temporary disability that prohibited student from receiving education benefits.

40 - Re-entry after dropping out from same school district in a previous school year – A student (retrieval) who re-enters the same school district after he or she had “dropped out” in a previous school year.

45 - Student discontinued schooling for six weeks or longer, but returned to the reporting district before the end of the reported school year. These students were not receiving educational services from any source while not in attendance.

50 - Re-entry after expulsion without educational services from same school district in a prior year – A student who re-enters the same school district after he or she was expelled during a previous school year.

55 - Re-entry after being expelled without educational services earlier in the same school year.

70 - Re-entry after transferring to an External GED program – Student previously withdrew to pursue a GED certificate through a program not run by a Colorado school district.

90 - Re-entry after being reported as a graduate in a prior year. The student may have been previously reported as a graduate by the district, or by another Colorado public school district.

91 - Re-entry after being reported as a diploma recipient (IEP) in a prior year. The student may have been previously reported as receiving a diploma by meeting IEP requirements by the district, or by another Colorado public school district.

92 - Re-entry after receiving a certificate of completion – A student who re-entered a school after receiving a certificate of completion, attendance, or achievement from the reporting district.

93 - Re-entry after receiving a General Education Development Certificate (GED) – A student who entered a school after receiving a GED certificate.

#### **Exit Codes:**

01 - Reached maximum age for services – A student who left school because he or she has reached the maximum age to receive an education program allowed by federal, state, or local laws.

02 - Death – A student whose membership is terminated because he or she died during or between regular school sessions.

06 - K-6 student exited to an unknown educational setting/status. Applicable only to students in grades K – 6. Applicable if the reporting district does not have information about the educational environment into which a student transferred.

12 - Transfer to a detention center within district. A student whose educational services have moved from a public school to an educational program at a detention center within the district. School district staff members are providing the educational services at the detention center.

13 - Transfer to a public school in a different Colorado school district – A student who transfers to a public school in another school district/BOCES within the state.

14 - Transfer to a school located in a different state/country – A student who transfers to a public school located in another state or country. This transfer must be documented by either an education records request from the receiving school, a signed confirmation of enrollment and attendance, or an official confirmation of emigration from a federal agency.

15 - Transfer to a non-public school – A student who transfers to receiving an educational program at a non-public school. This transfer must be documented by either an education records request from the receiving school or a signed confirmation of enrollment and attendance.

16 - Transfer to home-based education (home schooling) – A student who transfers to receiving an education program in a home-based education environment (home schooling) for reasons other than health. This transfer must be documented by a written statement or form signed by the student's parent or guardian.

18 - Transfer to a Career and Technical (vocational) Education program not administered by a Colorado school district or BOCES – A student who transfers to an occupational training program, recognized but not administered by the school district, that leads to a certificate or other evidence of completion.

19 - Transfer to a Licensed Eligible Facility or State Operated Program and is attending an on-grounds school – Student is publicly placed in and is attending an on-grounds educational program in a licensed facility (E.g. Residential Child Care Facility, hospital), or in a state-operated program (e.g. Colorado School for Deaf and Blind, Pueblo Mental Health, Ft. Logan Mental Health).

20 - Transfer to a facility administered by the district. A student whose educational services have moved from a public school to an educational program at a facility within the school district. The educational program in the facility is administered by the district.

21 - Transfer to a facility operated by the Colorado Department of Corrections or Division of Youth Corrections. Student is incarcerated in a correctional facility.

22 - Student exited the district after previously being erroneously coded as a graduate in a prior year.

30 - Illness/Injury – A student who because of a serious/critical illness or injury was unable to complete this year’s educational program and is not receiving educational services through a home-bound program. This code should not be used for exit due to pregnancy/child-birth, or for “minor” illness or injury from which the student is expected to return before the end of the reported school year.

40 - Dropped out – A student who was enrolled in school at any time during the current school year, but leaves school for any reason other than one of the following exclusionary conditions: 1) transfers (with official documentation) to another public school district, private school, home based education program or other state- or district-approved educational program; 2) temporary absence due to suspension or expulsion; or 3) serious illness or death and does not complete their education. This would also include a student who was in membership the previous school year and who does not meet the above exclusionary conditions and does not return to school prior to the end of the school year. Typically only used for students in 7<sup>th</sup> grade or higher (if PK – 6, use exit type code “06” instead.)

50 - Expulsion – A student who leaves school involuntarily due to an expulsion approved by appropriate school authorities and is not receiving any education benefits while expelled. Applies only to students who are expelled and do not return before the end of the reported school year.

55 - Expelled without educational services and returned to the same school before the end of the reported school year.

70 - GED Transfer – Student exits to participate in a GED preparation program not administered by the district (e.g. a GED program offered through an institution of higher education or a private company.)

90 - Graduated with regular diploma – A student who received a regular high school diploma upon completion of local requirements for both course work and assessment. Includes students with disabilities who meet all requirements of an IEP aligned with state standards.

91 - Graduated with regular diploma by meeting IEP requirements – A student who received a regular high school diploma upon completion of local requirements for both course work and assessment and additional certifications in a career major or pathway relating to participation in a school to career educational program, but did not meet the same standards for graduation as those for students without disabilities (deleted for 2010-11).

92 - Completed (non-diploma certificate) – A student who has received a certificate of completion, attendance, or achievement. Also includes students who have not received a high school diploma but have been granted admission to an institution of higher education.

93 - General Education Development Certificate (GED) – A student who has received a GED certificate upon completion of a GED preparation program administered by the reporting district.

94 - Student transferred to a non-district run GED program AND received a GED certificate all in the currently reported school year.



95 - Student received a diploma in the current year after being reported as a GED recipient by the reporting district in a previous collection year.

Note: Exit code 25 designating students with extended absences of 10 days or more was not included because it is a new code that is not reported reliably.

## **APPENDIX F**

### **Advisory Committee Members**

Don Anderson, Superintendent of Burlington School District

John Barry, Superintendent of Adams-Arapahoe School District, Aurora

Randy DeHoff, State Board of Education

Jody Ernst, Colorado League of Charter Schools

Vody Hermann, Colorado Department of Education

Christina Jean, Denver Public Schools, CEA Representative

Amy Kirkwood, Bennett School District, Board of Education

Rebecca Kluck, CFO, Pueblo City School District – EDAC Representative

Representative Tom Massey

Alex Medler, National Association of Charter School Authorizers

Representative Christine Scanlan

Senator Nancy Spence

Senator Pat Steadman

Chris Watney, Colorado Children’s Campaign

Mary Wickersham, Colorado State Government