Pupil Accounting Red Flags

Spring 2019 MPAAA Conference

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Overview



Agenda

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- Get To Know Your Auditor
- Manuals
- School Calendars
- Waivers
- Virtual Learning
- Work Based Learning
- Teacher Certification
- Schools of Choice
- Postsecondary Dual Enrollment
- Shared Time
- Seat Time Waivers
- Innovation Council

Get To Know Your Auditor

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THE best practice you can have is to be proactive in discussing a new program the district wishes to offer prior to implementation.

- This gives the auditor a chance to become familiar with the program prior to the audit.
- It gives the district a chance to identify potential issues that could result in the loss of funding prior to implementation.

Manuals

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Pupil Accounting Manual

- The Playbook
- Sections 1-4 apply to all districts and enrollments
  - Covers things like necessary documentation, board approval
- Sections beginning with 5 or 6 are "specialized"

Pupil Membership Auditing Manual

- This is what your auditors follow

School Calendars

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- Must meet the 1098 hour requirement
- Must meet the 180 day requirement
  - Hours vs Days – Two Separate Requirements
  - Need 180 days with attendance at or above 75%
- Instruction must be scheduled for count day
- If you have a Labor Day waiver, district must not have instruction scheduled on the Friday before.

School Calendars

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Make-up Days

- Insure that make-up days are part of the negotiated calendar
- May want to end school week on a Wednesday
- Reschedule at the end of the year -> 60% attendance
- There is nothing restricting a district from rescheduling instruction for a Saturday

Forgiven time

- First Six
- Additional Forgiven Time
  - Must have 6 canceled days
  - Cannot grant before days needed
  - Cannot be used for attendance issues

Waivers

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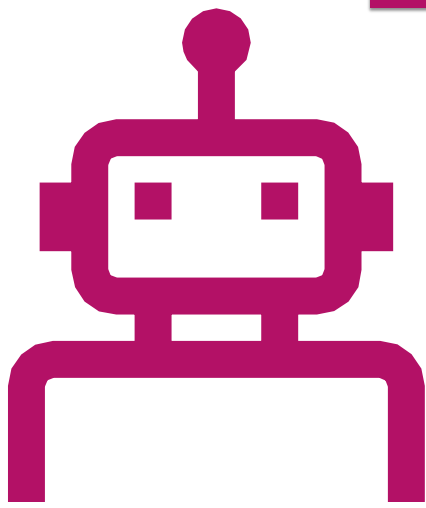
- #ThingsYourAuditorWillAskFor
- http://www.mi.gov/sasf -> Pupil Accounting Information
- All requests through online form; hard copies not sufficient

Waiver Information
Common Calendar Waiver
Labor Day Waiver
Alternative Count Day Waiver
Schools of Choice Waiver
Additional Forgiven Days Waiver
Travel Time Waiver
Days / Hours Waiver (OEII)

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Virtual Learning

- All virtual programs that would have been part of 5-O-A, 5-O-B, or 5-O-D are now part of 5-O-D.
- **Parent consent needed if student has 1 or more virtual courses**
- Can be self-scheduled



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Participation

Alternatives to Two-way

- Physical attendance
  - Completing an assignment in each course on count day.

Virtual Learning

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Two-Way

- Two-way must related to a course on the schedule
- Between the teacher or mentor
- If mentor, could be about course progress.
- One course, each week

Virtual Learning

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Sequential schedules

2 vs multiple courses

- If more than two, must offer computer and internet
- Must have an EDP unless 166b

Virtual Learning

Virtual Learning

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Follow 5-O-D **UNLESS** the one of the following applies:

- The virtual course is being delivered through a learning lab (5-A).
- The virtual course is a postsecondary level course that is offered under 5-G-A or 5-G-B.
- The course is a traditional course that uses virtual content to supplement the instruction (so the virtual content is not consequential to the course).
- Cyber schools

Work-based Learning

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MCL 380.1279h

Revamped Section 5-P of the PAM

Focused on membership requirements

Work-based Learning

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Must still follow

- Administrative rules 340.15 and 340.16
- Youth Employment Standards (R 408.6199 - 408.6309)
- Federal employment laws (Hazardous Occupation Bulletin)

Site visitations vs monitored experience

- 30 days for SE
- 9 weeks for GE

Work-based Learning

- R340.1733(i)- Worksite-based learning requires
  - A written agreement/plan which includes:

    (i) Expectations and standards of attainment

    (ii) Job activities

    (iii) Time and duration of the program

    (iv) Wages to be paid to the student, if applicable

    (v) Related to instruction, if applicable. The superintendent of the school district shall designate a staff member to visit the student's worksite at least once every 30 calendar days for the duration of the program.

Teacher Certification

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Two separate deductions

- 388.1763 – Salary Deduction
  - Prorated to represent time without proper certification
- 388.1606 – Membership Deduction
  - Deduction as of certification status on count day.

There is legislation in the proposed boilerplate language that would allow for the membership deduction to be .

Teacher Certification

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Teachers must be employees of the district per MCL 380.1231

- Except if course is a statewide virtual provided under 21f and your districts is not the course provider.
- 23a Exception
  - Until February 1, 2020, if the district partners with an education management organization for the program, the teacher of record may be employed by or contracted through the education management organization.
- Except if you are a PSA that does not directly contract with staff.

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Seat Time Waivers

- No longer needed for self-scheduled virtual programs.
- Primarily used for Project Based Learning and other offline programs.
  - Incarcerated pupils, community release programs
- Districts that continue to host programs under a STW need to continue to report.
- A STW does not allow a student to be claimed for a full membership if the schedule does not reflect a full-time course load (1098 hours).

- Students enrolled under 388.1705c
- (11) A district shall continue to allow a pupil who was enrolled in and attended the district under this section in the school year or semester or trimester immediately preceding the school year or semester or trimester in question to enroll in the district until the pupil graduates from high school. This subsection does not prohibit a district from expelling a pupil described in this subsection for disciplinary reasons.

Schools of Choice

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Schools of Choice

- Students enrolled under 388.1705c
- (19) In order for a district or intermediate district to enroll pursuant to this section a nonresident pupil who resides in a district located in a contiguous intermediate district and who is eligible for special education programs and services according to statute or rule, or who is a child with disabilities, as defined under the individuals with disabilities education act, Public Law 108-446, the enrolling district shall have a written agreement with the resident district of the pupil for the purpose of providing the pupil with a free appropriate public education. The written agreement shall include, but is not limited to, an agreement on the responsibility for the payment of the added costs of special education programs and services for the pupil. The written agreement shall address how the agreement shall be amended in the event of significant changes in the costs or level of special education programs or services required by the pupil.

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Schools of Choice

- Students enrolled under 388.1705c
- A best practice would be to form an agreement with the resident district whenever a 105c student is enrolled, regardless of the need for services, before the student attends the schools of choice district.
- Once a student has attended, the only option is to amend the agreement. This may mean that the 105c district ends up picking up the added costs…

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Postsecondary Dual Enrollment

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- PA 160 – Postsecondary Degree or Certification Oriented
- PA 258 – Postsecondary Certification (Voc Ed)
- In-state unless your district boarders another state, then 20 mile limit
- Limit of 10 postsecondary courses
- District can support a student's enrollment beyond the act… 8th graders, additional courses, summer learning
- Foreign Exchange Students

Postsecondary Dual Enrollment

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- **Early Middle College**
- Accelerated programs where the student will be learning during the summer or after school.
- Additional FTE based on hours beyond 1098. See the credit to instructional hour conversion in 5-G-A.
- Programs must be 181+ days, expected to complete with both a high school diploma and 60 transferable college credits or associate's degree.

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Postsecondary Dual Enrollment

Early Middle College

Must provide auditor with a program of study.

"Extra" courses must be part of the program of study.

The program of study will provide evidence the student is expected to complete early.

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Postsecondary Dual Enrollment

Early Middle College

Must be coded 3500 by grade 11.

Must be reported with 3500 each collection.

This ensures that the student is on-track in fifth year.

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Shared Time

Section 166b of the State School Aid Act (388.1766b)

Course offerings.

(3) A nonessential course in grades 1 to 8 is a course other than a mathematics, science, social studies, and English language arts course required by the district for grade progression. Nonessential courses in grades 9 to 12 are those other than algebra 1, algebra 2, English 9-12, geometry, biology, chemistry, physics, economics, geography, American history, world history, the Constitution, government, and civics, or courses that fulfill the same credit requirement as these courses. Nonessential elective courses include courses offered by the local district for high school credit that are also capable of generating postsecondary credit, including, at least, advanced placement and international baccalaureate courses. College level courses taken by high school students for college credit are nonessential courses. Remedial courses for any grade in the above-listed essential courses are considered essential. Kindergarten is considered nonessential.

Shared Time

- Test for nonessential:
  - Is the course offered and available to full-time students?
  - Is the course a required course for advancement?
    - Academic, Taught by a certified teacher, Credit Awarded
  - If the course a more advanced form of an essential course?

Shared Time

- Community Experts vs Certified Teachers
- Where is the course offered? In another district? Out of state? A separate building? At the YMCA? At the stable?
- Background Checks and Student Safety

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Shared Time

- Labs, Hands-on Experiences, Extended Learning Opportunities.
  - Enhance course learning
  - Offered and available to full-time students.
- Course Content – Instructional Hours and Quality
- Virtual vs Traditional – Format Matters
- Schools of Choice?

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Shared Time

- The safe route:
  - Discuss first time offerings with pupil membership auditor.
  - Ensure that the course appears in the regular course catalog.
  - Use a single course catalog.
  - Ensure that full-time students can and do participate.
  - Courses – Actually available vs practically available

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Shared Time

- **New Reporting Requirement for 2018-19**
  - **The district provides the department information necessary to quantify all of the following, in a form and manner [TSDL] prescribed by the department in conjunction with the center [CEPI]:**
    - **(i) A complete listing of all courses provided to pupils counted in membership in the district.**
    - **(ii) Course enrollments by each participant using local coding and the school codes for the exchange of data (SCED).**
    - **(iii) Identification of each course teacher or mentor.**

The good news, we understand this is a new requirement. We will work with you if you are have difficulty fulfilling the requirement fully.

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Shared Time

- **Student Membership Cap – 0.75 FTE**
- **Membership Growth Cap – 388.1606(4)(ll)**
  - **(i) shared time membership equals or exceeds 5% of the membership for non-share time pupils last year, then growth for shared time must not exceed 10%.**
  - **OR**
  - **(ii) shared time membership is less than 5% of the membership for non-share time pupils last year, then growth for shared time must not exceed the greater of the following:**
    - **(A) 5% of the membership for pupils not counted in membership under section 166b.**
    - **OR**
    - **(B) 10% more than the membership for pupils counted under section 166b last year.**

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Other Topics

- Foreign Student Legislation MCL 388.1606(4)(mm)
  - Beginning with 2019-2020, if district charges tuition for a pupil that resided out of state in the immediately preceding school year, the pupil shall not be counted in membership
- Homebound Hospitalized – Student Transitions
- Mentors – must always be a professional employee of the district… including PSAs.
- Labor Day Waiver Legislation
- Snow Day Legislation

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Other Topics

Desk vs Field Audits

Field audits take a deeper dive

Schedules and board approval

Must have board approval if alternative schedules are used.

Taking attendance

Must be signed by the teacher.

Excused vs unexcused policy

If a student is marked excused, be prepared to provide policy and documentation of excuse to auditor.

Innovation Council

- A Department initiative, manned by members of the field.
- Advice on how to improve school programs or start a new one.
- Have an innovative program but need some flexibility?

www.mi.gov/mde-ic

Questions

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