



Jan. 8, 2019

UEN Comments Regarding Proposed Rules: Online Learning and Dropout Prevention Proposed Administrative Rules,

Thank you for the opportunity to provide comment regarding proposed rules noticed to the Administrative Rules Review Committee, Jan. 8, 2019. In short, UEN is supportive of the rules as proposed regarding Suicide prevention, ACES training, and extracurricular open enrollment. Urban districts do not engage in operational sharing, so we have no comment on that section. We submit the following comments regarding online learning and dropout prevention.

Online Learning beginning on page 1270 of the [Administrative Bulletin](#), we have a few questions regarding the DE oversight of district-developed online learning:

First, we find it confusing to include the reference to district-developed online learning programs under the rules that are specifying DE oversight of private providers, such as in new section 15.11 on page 1271 which is more about the waiver of offer and teach requirements than about the offering of online courses generally. The Department Responsibilities rule 281-15.13(256) subsection 1 does not mention DE oversight or review of all district online learning offerings. The DE has been and continues to be the oversight arm of the state regarding course quality and alignment for courses offered via Iowa Learning Online. It does make sense to include the DE's approval of private providers under this section, since they also maintain responsibility for the application process and approval of private providers.

Specifically, 15.11(4) (a) states that the course developed locally may be offered, but at the end of that paragraph, it says the course must meet Iowa content standards (we agree) and satisfies the requirements of subrule 15.13(1). 15.13(1) applies to ILO courses and private providers.

We would request elimination of that cross reference, ending the sentence after Iowa content standards. Alternatively, the rules that apply specifically to locally developed online courses could be written as a distinct subsection rather than grouping those with ILO and private providers, over which DE has approval authority.

Drop Out Prevention Page 1284 Item 4 Drop Out Prevention (DoP): UEN requests the DE to delete the transportation restriction which limits DoP transportation to programs offered in another district, especially in light of new subsection *j* that says DoP may be used for any purpose determined by the board that directly benefits students. This provision, limiting DoP transportation costs to only transportation of students to alternative programs offered outside of the district, disadvantages urban districts that may have programs inside the district but not in the student's attendance area, which would require additional transportation costs specific to providing programs to eligible students. We also request the DE to delete the parallel phrase about transportation in 98.21(3) regarding inappropriate uses of categorical funding which prohibits DoP for transportation costs with the exception of alternative programs outside the district.

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