

Could the California Independent Study Model Work in Colorado?

PREPPARED BY

MOMENTUM STRATEGY & RESEARCH

Introduction

*Independent study is an alternative instructional strategy, but it is not an alternative curriculum. Independent study students work independently, according to a written agreement and under the general supervision of a credentialed teacher or teachers. While independent study students follow the district-adopted curriculum and meet the district high school graduation requirements, independent study offers flexibility to meet individual student needs, interests, and learning styles.*¹

Independent study has occupied a unique role in California's educational system dating back to 1976. Originally intended for child actors, athletes, and other students in atypical situations, independent study options provided the ability for students to take their education on the road or provide support to families wishing to educate their children within the home. However, what might have been described as a quirky and sleepy product of the state's educational system early on took on new meaning in the 90's, with the somewhat contemporaneous advent of charter schools and the worldwide web.

Today California's independent study options include a wide range of schools and settings lumped (and regulated) together as non-classroom-based schools offering a variety of educational setting from full-time online schools, blended or hybrid schools, home school programs and all sorts of combinations thereof. Some schools labeled as independent study offer full-time, site-based instruction to a proportion of their students while simultaneously offering full-time online or independent, home-study options to others. Other independent study schools provide both independent study and site-based instruction to all of the students, requiring attendance 2, 3, or 4 days a week with home based independent learning occurring the other days. The variety of options abound, but under California Education Code all of these schools are regulated under the auspices of "non-classroom based" schools.

As with more traditional school models, or what California Statute refers to as classroom or site-based instructional options, the performance outcomes of these independent study schools vary widely. The purpose of this paper is to explore how features unique to the independent study model, as well as the statutory and regulatory systems that allow these non-traditional models to exist, might promote increased performance outcomes.

Non-Classroom Based Instruction, Nationally

To many people, when the term non-classroom based instruction is mentioned we think of online schools or courses. Online schools, whether full-time or blended, have become increasingly popular over the last decade and have, thus, been under a great deal of scrutiny as to their overall ability to educate students effectively. It was during a recent investigation into the performance of online charter schools that California was found to have 43 percent of all the country's "online" schools (140 out of 328). Additionally, 8 of the top 10 performing "online" schools in the country (in 2011-2012) came from CA. Upon further investigation into enrollment practices and programmatic highlights advertised on these top performing schools' websites it was found that nearly all of these California "online" schools had varying amounts of instruction that were conducted via the web or a computer.

¹ California Department of Education's website

Instead, these top performing schools describe themselves as independent study schools and included a remarkable *variety* of models (and modalities) nearly all organically developed and serving as interesting a mixture of the state's population as charter schools overall. From this research it became clear that, from a charter school and education reform perspective, California's independent study model could be very informative.

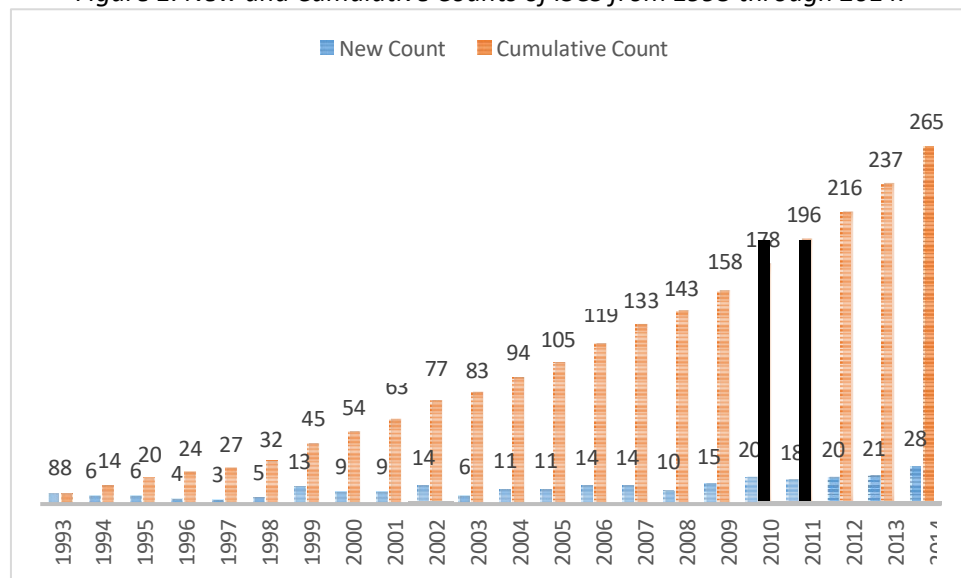
The following sections outline the characteristics commonly found among independent study charter schools in California, explore whether factors differentiating independent study charters appear to be related to differences in student performance, and identify the statutory and regulatory environments that facilitate the innovation found within this model of schools.

California Independent Study Charter School Characteristics

As of the 2014-2015 academic year, there are 265 independent study charter schools (ISCS) across the state. ISCS charter schools reside in 44 out of the state's 58 counties but because ISCS can serve students from counties that are adjacent to the county in which the school is authorized, students from all 58 counties have the option to attend an ISCS.

That has not always been the case, however. ISCS have grown in popularity especially over the last several years, as the number of new ISCS charters per year has been around 20 and 28 new ISCS opening in August of 2014. See Figure 1.

Figure 1. New and Cumulative Counts of ISCS from 1993 through 2014.



In 2013-2014, 130,608 students were enrolled in an ISCS,² with an additional estimated 3,022 students enrolled in one of 28 new ISCS that opened in August of 2014³. Average enrollment across all 265 ISCS is 515 students, while median enrollment is 271. This large difference between the average and median

² 2013-2014 enrollment data was obtained from the California Department of Education's school profile pages.

³ Estimated enrollment for newly opened charter schools was provided by the California Charter Schools Association.

Enrollment figures indicate that there are a few very large schools that appear to skew the average upward. In fact, the range of enrollment figures in ISCS is large, ranging from 1 to over 5000.

Table 1 outlines the demographics of the student populations attending all ISCS. Compared to the average student demographics of all public schools in the state, ISCS serve lower percentages of minority, FRL and ELL students⁴.

Table 1. Student Demographics for Independent Study Charter Schools	
Student Demographic Characteristics	Average Percent
Minority Students	50%
FRL Eligible	54%
ELL Student	7%
SPED	8%

A majority (52.5 percent) of ISCS serve students in Kindergarten through 12th grade, with 32.5% serving some combination of middle and high school grades (e.g., 6-8, 6-10, 6-12, 8-12, 9-12, 11-12) and 15 percent serving elementary or elementary and middle school grades.

Table 2. Percent of Independent Study Charter Schools Classified into Various Groups*	
Site-Type	Percent of ISCS
Independent study Only	77%
Combination Site-Based and Independent study	23%
Autonomy Status	
Autonomous	63%
Non-autonomous	37%
Start-up Type	
Start-up	92%
Conversion	8%
Management Model	
CMO/EMO	32%
Network	13%
Freestanding	55%
Other Design Elements	

⁴ In 2013-2014, the average California public school (charter and traditional) served 74 percent minority students, 59 percent FRL eligible students, and 22 percent ELL students.

Full-time Online	15%
Alternative School Accountability Measure	13%

*Categories are not mutually exclusive; each classification category includes all ISCS.

Table 2 outlines the percent of ISCS that are classified into the various categories having to do with site-type, autonomy status, start-up type, management model and other design elements. The next several paragraphs define each of the categories and explores any differences in student demographics or program characteristics between them.

Site Type

When exploring the non-classroom-based charter schools, we found two separate labels; independent study and combination. There is little in the way of defining what the difference is between independent study and combination, statutorily or otherwise. Combination schools all appear to offer both site-based instruction and at least one independent study option (i.e., homeschool support or online “track”). However, when reviewing websites of school labeled as independent study, many of these schools too offer both site based and independent options. One possible distinction might lie in the number of sites independent study and combination charter schools have. A recent study on California’s charter school facilities found that ISCS had an average of 4.25 sites per charter⁵. Combination charter schools, on the other hand, appear to run single site schools.

Table 3. Average Differences in Charter Characteristics for Independent Study Charter Schools that provide Independent Study Options Only and those that have Both Site-Based and Independent Study Options		
Charter Characteristic	Independent Study Only	Combination Site-Based and IS
Avg. Age of the Charter	10 years	11 years
Avg. Size of Enrollment	707	484
Avg. Percent Minority	49%	53%
Avg. Percent FRL Eligible	54%	52%
Avg. Percent ELL	6%	9%
Avg. Percent SPED	8%	9%
Avg. Percent Taking at least One Online Course	16%	14%

Table 3 outlines the demographic and feature characteristics of both the independent study only and the combination charter schools. The independent study only schools tend to be a bit newer (10 vs. 11 years) and have larger numbers of students enrolled than the combination charter schools (707 vs 484, respectively). Though the differences are not large, the independent study only charters also tend to have lower percentages of minority students, English language learners, and special education students,

⁵ A forthcoming report from the Charter School Facilities Initiative found that among the 114 autonomous independent charter schools that existed in 2013-2014, there were an estimated 481 sites (also known as resource centers), with an average of four resource centers per ISCS.

on average, than the combination sites. Independent study only charter schools do enroll a slightly higher percentage of students qualified for free or reduced priced meals (54 vs. 52percent), and also have a bit higher proportion of their students taking at least one course online than students attending combination charter schools (16 vs. 14 percent, respectively).

Autonomy Status

The words “autonomous” to describe charter schools involve generally understood but unofficial California-specific designations that speak to degree of charter “dependence” on their authorizers. Generally speaking, non-autonomous charters do not have their own board or legal status and are fully dependent on the authorizing school district; while autonomous charter schools do have their own boards and are fully independent of their authorizer.

Table 4. Average Differences in School Characteristics between Autonomous and Non-Autonomous Independent Study Charters		
Charter Characteristic	Autonomous Independent Study Charters	Non-Autonomous Independent Study Charters
Ave. Age of the Charter	8 Years	11 Years
Ave. Size of Enrollment	800	379
Ave. Percent Minority	53%	41%
Ave. Percent FRL Eligible	58%	47%
Ave. Percent ELL	6%	6%
Ave. Percent SPED	8%	9%
Ave. Percent taking at least One Online Course	30%	23%

Autonomous independent study charter schools tend to be newer (8 vs 11 years) and enroll more than twice the number of students as non-autonomous charter schools (800 and 379, respectively). *See Table 4.* Autonomous charter schools also serve higher percentages of minority and FRL eligible students-- though both groups serve similar percentages of ELL and SPED students. Approximately 30 percent of autonomous independent study charter school students take at least one online course, as compared to 23 percent of students attending non-autonomous independent study charter

Start-up Type

Conversion charters are those that were once traditionally run public schools but were converted to charters either voluntarily or as a result of underperformance requiring the school be “turned around.” Start-up charter schools are charter schools that were formed by a founding group as new schools.

Table 5. Average Differences in School Characteristics between Start-up and Conversion Independent Study Charters		
Charter Characteristic	Start-up Independent Study Charters	Conversion Independent Charters
Ave. Age of the Charter	9 years	13 years
Ave. Size of Enrollment	683	267
Ave. Percent Minority	49%	43%
Ave. Percent FRL Eligible	55%	48%
Ave. Percent ELL	6%	7%
Ave. Percent SPED	8%	9%
Ave. Percent taking at least One Online Course	29%	11%

Start-up ISCS tend to be quite a bit larger than conversion ISCS (683 vs. 267, respectively) and serve higher proportions of minority students (49 vs. 43 percent) and FRL students (55 vs. 48 percent). However, there is little difference in the proportion of students that are ELL (6 to 7 percent) or special education students (8 to 9 percent) between these two groups of ISCS. Start-up ISCS do tend to be newer (at 9 years old on average) than conversion ISCS (at 12.5 years old on average), and have a much higher proportion of students taking at least one course online (29 vs 11 percent).

Management Model

Freestanding charter schools have no management or network affiliation; network schools tend to be part of a small “home grown” set of schools that began as a single freestanding school, but replicated within the area; CMO schools are managed by non-profit management companies, and EMO schools are managed by for-profit management companies e.g. Opportunities for Learning/ Options for Youth, SIATech, Learn 4 Life, K12, Connections Academies, Pivot Charter Schools, Academy of Arts and Sciences California.

Table 6. Average Differences in School Characteristics between Independent Study Charters with Different Management Models

Charter Characteristic	Managed Independent Study Charter Schools	Network Independent Study Charter Schools	Freestanding Independent Study Charter Schools
Avg. Age of the Charter	7 Years	10 Years	10 Years
Avg. Size of Enrollment	1019	556	474
Avg. Percent Minority	60%	48%	43%
Avg. Percent FRL Eligible	65%	54%	48%
Avg. Percent ELL	8%	6%	5%
Avg. Percent SPED	9%	8%	9%
Avg. Percent taking at least One Online Course	46%	23%	19%

CMO or EMO managed ISCS tend to be newer than freestanding ISCS and those that operate within a small network. Managed ISCS also tend to have much larger enrollments than either freestanding or network ISCS; and managed ISCS also tend to enroll higher percentages of minority students, FRL students and English language learners. Managed ISCS also have higher percentages of students taking at least one of their courses online than the other two groups of schools.

Network ISCS and freestanding ISCS are more similar to one another in age and demographic characteristics than to managed ISCS; though network ISCS, on average, do serve higher proportions of minority students, FRL students, ELL students, and special education students than freestanding ISCS. Additionally, network ISCS have a higher percentage of students taking online courses than their freestanding counterparts.

Other Design Elements

Two design elements of interest were the ICSC that provide only full-time online instruction, of which we identified 28 schools and Alternative School Accountability Model (ASAM) schools. ASAM schools are those that receive an alternative accountability framework from the state because they serve at least 70 percent high-risk students.⁶

⁶ From CDE's website: "Participation in the ASAM is voluntary. ASAM schools include community day schools, continuation schools, county community schools, county court schools, Division of Juvenile Justice (formerly California Youth Authority) schools, opportunity schools, and alternative schools of choice and charter schools that meet SBE criteria." <http://www.cde.ca.gov/ta/ac/am/cefamas.asp>

Table 7. School Age and Demographic Characteristics of ISCS that are Full-Time Online and those that are Classified as ASAM Schools

Charter Characteristic	Full-Time Online ISCS (n=28)	ASAM ISCS (N=35)
Ave. Age of the Charter	6 years	10 years
Ave. Size of Enrollment	873	532
Ave. Percent Minority	52%	75%
Ave. Percent FRL Eligible	55%	81%
Ave. Percent ELL	4%	15%
Ave. Percent SPED	9%	10%

As compared to all ISCS (refer to Table 1), those that offer only full-time online instructions serve slightly higher percentages of minority students and students that qualify for free or reduced lunch, but slightly lower percentages of ELL and special education students. ASAM ISCS, on the other hand, serve markedly higher percentages of all demographic characteristics listed in tables 1 and 7.

Performance among Independent Study Charter Schools

To investigate the performance of California's independent study charter schools, data was collected on up to five elements per charter, including the following:

- 2010-2011 Statewide Academic Performance Index;
- 2011-2012 Statewide Academic Performance Index;
- 2012-2013 Statewide Academic Performance Index;
- 2012-2013 GreatSchools Rating; and
- 2012-2013 California Charter Schools Association Rating

Appendix A summarizes each rating as well as the interpretation of each rating in greater detail. Briefly, each rating was converted into a scale range (based on the sources stated valuation) with cut-points for high, medium, and low performance (or below, at, or above expectation). Each rating was given a point value as follows:

- 1 point for the lowest score range/ rating
- 2 points for the middle score range/ rating
- 3 points for the highest score range/ rating

For schools that had all five ratings available the total point value was equal to 15 points. Only schools with at least three data points available were considered in this analysis and missing values were not included in the total potential point value. "Total scores", therefore, are provided in terms of the percentage of the total possible points received.

The Table below (Table 8) outlines the average percent of points received for each type of ICSC considered in this report. As an additional data point to inform the stability of enrollment for each type of ICSC, mobility rates (the percent of students enrolled at the beginning of the school year that remained enrolled at the end of the school year) are also provided but were not included in the performance “rating”.

Table 8. Percent of Independent Study Charter Schools Classified into Various Groups*		
Site-Type	Average Percent of Total Rubric Points Received	Average Mobility Rates for 2013-2014
Independent study Only	50%	89%
Combination Site-Based and IS	56%	90%
Autonomy Status		
Autonomous	49%	89%
Non-autonomous	54%	90%
Start-up Type		
Start-up	51%	89%
Conversion	52%	90%
Management Model		
CMO/EMO	45%	93%
Network	53%	81%
Freestanding	53%	89%
Other Design Elements		
Full-time Online	47%	95%
ASAM	35%	86%

*Categories are not mutually exclusive; each classification category includes all ICSCs.

Characteristics of Top 10 Independent Study Charter Schools

Student Characteristics

Table 9. Average Student Demographics and Behaviors among the Top Ten Performing ICSC (Scores ranging from 87 to 100 Percent of Possible Points)	
Students Characteristics and Behaviors	Average Percent
Minority Students	39%
Students Eligible for Subsidized meals	16%
ELL Students	3%
SPED Students	5%
Students Taking at least One Online Class	7%
Mobility Rate	80%

The top performing ISCS tend to serve less challenging student populations than the average ISCS does, with lower percentages of minorities, free or reduced price meal eligible, ELL and SPED students. The top 10 schools also have a lower percentage of student taking at least one online course and lower mobility rates, on average, than the typical California ISCS.

School Characteristics

Table 9. Characteristics of California's Top 10 Performing ISCS	
School Characteristic	Average of Top Ten Schools
Age of School	10 Years
Enrollment	690
Percent KG-6	0%
Percent KG-8	40%
Percent KG-12	30%
Percent 6-8	0%
Percent 6-12	10%
Percent 9-12	20%
Site Type	
IS Only	50%
Combination	50%
Start-up Type	
Start-up Type	70%
Conversion	30%
Autonomy Status	
Autonomous	60%
Non-Autonomous	40%
Management Model	
Freestanding	40%
Network	30%
CMO/EMO	30%
Other Design Elements	
Full-time Online	0%
ASAM School	0%

California's top performing ISCS tend to have non-traditional grade configurations, much like ICSC in general. Though the most frequently occurring grade configuration among those in the highest performing 10 schools is K-12. The top ten schools tended, more often, to be start-ups rather than conversions, autonomous rather than non-autonomous, and freestanding rather than network or managed schools.

Given the mission of California's ASAM schools, in general, to serve the state's highest risk students (which tend to be low performing, over-age and under-credited students) it is not surprising that none of the top ten ISCS are ASAM schools. Consistent with other research currently being done (Momentum Strategy & Research, unpublished), none of the top performing ISCS were those offering full-time online programming only. Rather all of the top performing charter schools offered a variety of site-based, independent study, and online course options.

When reviewing the websites of the top 10 independent study schools all made reference to offering flexibility by with high academic standards. Five of the sites referred to themselves as hybrid independent study schools, which appears to mean that each student does some independent study and some on-site instruction throughout each week. Five specifically mentioned providing home school support, and four offered some of their curriculum through online course work. All 10 provided multiple programs within the charter from which students and families could select. Some of the schools appear to steer students toward more site-based options if they see the student is struggling to keep up with their work in independent study.

California's Independent Study Statutory and Regulatory System

Independent study is introduced and authorized through the California Education Code at Sec. 51745- 51749.3 and corresponding sections (Title 5 11700 – 11705) of the California Code of Regulations. Those general provisions apply to school districts and county offices, as well as charter schools. With relatively few exceptions noted below the statutory framework for independent study operates the same for charter schools and district/ county settings alike. Code section **11700.1** specifies that where district is used, it also means charter school "unless the context indicates otherwise."

Pursuant to California Code of Regulations, Title 5, Section 11700, "Independent Study" means an alternative to classroom instruction consistent with the district's course of study. "Independent Study is an optional educational alternative in which no pupil may be required to participate." This means: a) With regard to school districts or county offices of education, that they are not required to offer independent study, and b) School districts that do offer independent study are not obligated to permit a pupil to engage in independent study if school officials given responsibility for the decision determine that independent study is not an appropriate alternative for the pupil."

Language throughout the introductory sections of Sec. 51745 and the state's explanatory page of the CDE website repeatedly describes independent study as an option – reiterating that no districts are required to offer IS, and no students may be required to attend school via independent study.

Establishment and Operations

Schools and programs offering independent study receive authorization to open through the typical channels followed by charter applicants or school districts opening and operating a new school or program. Obviously, in the charter school context this means going through the standard charter school application process.

In general, unless otherwise exempt, the following three criteria must be met in order for non-classroom based charters to be guaranteed full funding levels: (1) at least 80 percent of total revenues must be spent on instruction or classroom support, (2) at least 50 percent of public revenues must be spent on certificated staff salaries and benefits, and (3) the pupil-teacher ratio must be equal to or lower than the pupil-teacher ratio in the largest unified school district in the county or counties in which the school operates, or the school must maintain a minimum of ratio of 25:1. A school that fails to meet these requirements may receive substantial cuts in its funding level. (CCSA website)

IS schools operate under a few notable statutory provisions:

Geography: IS charters may operate in their county of authorization and adjacent counties (**51747.3(b)**).

Teacher Contact: Certificated employees and each enrolled pupil shall communicate in person, or by phone no less than twice per month. (**51749.5(7)**)

Content equivalency: Regulations require that “the independent study option is to be substantially equivalent in quality and quantity to classroom instruction” (**CCR 11701.5**) which goes on to describe the expectation of equivalent services and resources for IS students.

Pupil-Teacher Ratios: Applicable to charter schools whereby the ratio must be no less than 25:1 or the highest ratio for all programs of the largest unified district in local county or counties), and specifies other relevant policies that must be in place. (**CCR 11704**)

Virtual or online charter schools may receive an “exemption” from the ratio requirement. Code Sec. **11963.5** describes online charter schools as being at least 80% over the internet, and if those schools meet certain obligations ranging from performance scores on the state’s accountability system to instructional expenditure requirements, the student teacher ratio requirement is waived.

Special Education: Notably the IS provisions state that *students with disabilities* are not eligible to participate in independent study unless the students’ IEP provides independent study as a recommended instructional strategy. (CCR 51745(c)) The following is drawn from the policies of one home study focused charter school:

"It is understood that no student who qualifies for special education services under the Individuals with Disabilities in Education Act (“IDEA”) shall participate in independent study unless it is specifically authorized in his or her IEP. Three unexcused absences or missing more than 50% of a student’s special education services in a month will result in the student being placed on probationary status. Parents will be invited to an IEP meeting to review their student’s educational progress, and to ensure that home schooling remains the least restrictive environment in which to promote educational benefit. A second probation in the current academic year will result in immediate dismissal from the charter school."

Funding: Public school funding in California is calculated on an Average Daily Attendance basis and is applicable for all classroom-based settings (at least 80% of instruction taking place in person at school sites). IS funding is handled differently as outlined at **51749.5**, including new language applicable to all providers as of the 15-16 school year.

Assuming schools meet all other substantive preconditions for offering IS coursework, the funding calculation begins with the requirement of 51749.5(a)(4) that courses are annually certified to be of the **same rigor and educational quality** as equivalent classroom based courses and shall be aligned to all relevant standards.

That certification is to include the calculations as to specific course credits and instructional minutes involved, including **daily instructional minute allocations**.

Certificated employees are then “to regularly (tied to their “not less than every two week” contact with students) certify” that each student is making satisfactory educational progress.

If the cumulative hours of coursework as certified thereby meets the minute requirements set for equivalent classroom based instruction the school may claim “apportionment” credit for that student equal to comparably daily ADA funding.

Enrollment: While clearly open ended on the front end, California’s regulations include repeated references to independent study being an option, and one available where deemed “appropriate” or in a student’s best interests. Ultimately, as described in **CCR 11700(d)(B)** schools are not obliged to permit a pupil to remain enrolled in IS if officials determine it is not an appropriate alternative for that student.

Prior to enrollment schools are required to enter into a “Written Learning Agreement” with parents outlining the expectations, process, and consequences of the alternative. **(CCR 51749.6)** enumerates specific elements of a “written learning agreement” including:

- 1) A summary of the applicable policies and procedures in place
- 2) Duration of courses – generally a depiction of the coursework involved and attendant time commitment
- 3) Learning objectives and expectations; how measured, and what basis will they be moved out if unsatisfactory progress.

Schools are required to monitor student work for adequate progress and intervene with students and their parents in the event progress is not adequate. Ultimately, where progress is continually insufficient the statutory scheme clearly anticipates students being referred to other schools or programs.

Colorado Implications/ Recommendations

1. Colorado's statutory scheme would be amended to explicitly authorize a new class of Independent Study school environment;
 - a. Schools, districts, perhaps even BOCES would be allowed to offer IS options.
 - b. Could be initially piloted with a fixed number of schools (and thus students – which would be important for funding purposes);
 - c. Restrictions in the charter law (home-based schools) and as to districts (complete educational program) would have to be defined as outside the IS guidance;
 - d. The legal and cultural implications as to "continued enrollment" as California has handled it would have to be addressed.
 - e. How to incorporate (or not) online learning as we know it.
2. Independent study enrollment and attached funding would be:
 - a. Generated on an individual student basis based on their work product – however, unlike California where the certification requirement amounts to little more than a paper trail connecting student time to coursework, Colorado's version would also incorporate regular "outcome audits" of the same coursework. Schools would be expected to document students making adequate progress as measured by time and completion along with periodic documentation that adequate completion of 8th grade math requirements translates to proficiency on state exams.

The state should incorporate some form of reliable, qualitative auditing of student level coursework to ensure consistency and quality control – both from the state in a fiduciary sense but also so parents and students can enroll with confidence. California does not appear to have the level course level quality control into their system that Colorado could manage – both as a technological matter and also as to the scope of anticipated pilot enrollment.

- b. Calculated and accessible in smaller, course/ credit level increments. As at minimum this would allow students to attend schools for limited periods (e.g. summer months) to accumulate credits outside their normal school calendar, or other settings where shorter-term enrollment is advantageous to the student. Taking this further to open up simultaneous enrollment at multiple schools is another step worth considering.
3. Pilot Efforts
 - a. A pilot through CSI would be a great opportunity to demonstrate and test ideas, mechanisms etc. in a responsible, controlled manner. Key elements include:
 - i. CSI puts out an RFP to demonstrate IS options – perhaps using the California "adjacent county" language along with the obligation that the applicants be headquartered in a district without exclusive authority or one that will allow the school to apply.
 - ii. The RFP provides the explicit requirements:

1. That part of the applicant schools' proposal must involve the ability to demonstrate their ability to track and monitor student completion / progress.
 2. On a periodic basis (not sure what's practical here) the internal tracking of adequate progress must be demonstrably correlated to proficiency outcomes.
 3. While use of in-person learning opportunities is positive, applicants must make the case that their operating in person centers either falls outside the definitions of "learning centers" in the HOPE context, or they are prepared to obtain the necessary permissions.
- iii. The RFP would stipulate that applicants agree to be governed by an "alternative funding formula" where per pupil funding is available up to 100% - where schools are able to document 100% completion rates for student work.

b. Challenges

- i. Provision in the CSI statute about charters being "non-home-based" (22-30.5-507(1)) could be seen as a barrier – though if not a barrier to full-time online schools, not sure why it would be here;
- ii. See 22-30.5d-508 (5) for CSI funding provision that mimics the regular charter law's provision about any contract that would require a charter to forgo funding they are otherwise entitled to being null and void. CSI would need some answer to this potential inconsistency before offering an IS pilot with different funding provisions;
- iii. California's provisions allowing schools to effectively un-enroll a student not making adequate progress (after lots of "process") is an unquestionably important part of their law but something not often on a Colorado agenda.

Appendix A

Scoring Rubric for Independent Study Charter Schools

Interpretation of API Scores

California's statewide target for the API is 800.

Using the California Charter School Association's interpretation of high, medium and low API scores (Appendix A of the 2014 State of the Movement Reports on page 50), we defined APIs as follows:

API $\leq$ 766 = **Low API (Bottom third of all charters in the state and a statewide rank of 1, 2, or 3)**

API between 767 and 845 = **Medium API (middle third of all charter in the state and a statewide rank of 4, 5, or 6)**

API $\geq$ 846 = **High API (top third of all charters in the state and a statewide rank of 7, 8, 9, or 10)**

Interpreting Great Schools Rating

According to the GreatSchools Rating: Methodology Report (retrieved from http://www.greatschools.org/catalog/pdf/New_Ratings_Methodology_Report.pdf), interpretation of the rating is as follows:

1-3 = **Below Average**

4-7 = **Average**

8-10 = **Above Average**

Interpreting CCSA Rating

The California Charter Schools Association (CCSA) uses a regression model that uses schools demographic characteristics to predict "expected" API scores for schools. API scores that fall within one standard errors (a statistical figure identifying the margin of error found within the predictive model) are said to be within the predicted range. Those within one standard deviation are above or below predicted (depending on whether they are above or below 1 SE) and those within two standard errors are said to be far above or far below (again based on whether they are above or below the predicted API for other schools with similar student demographic characteristics). CCSA looks across three years to get a sense of the stability of the schools performance over time.

Following is our interpretation of CCSA's 2012-2013 rating:

Far Below All Years, Far Below Most Years, Below All Years, and Below Most Years = **Below Expectation**

Within/ Fluctuating = **Meets Expectations**

Above Most Years, Above All Years, Far Above Most Years, and Far Above All Years = **Exceeds Expectations**

Total Point Values

Lowest scale range/rating for each rating was equal to 1 point.

Middle scale range/rating for each rating was equal to 2 points.

Highest scale range/rating for each rating was equal to 3 points.

All points were summed for a total possible point value of 15 points, for schools with all five ratings available from each source. Total possible points were adjusted for each school when ratings from some or all sources were not available. Only schools with a minimum of three data points were included in the performance analysis, and schools are evaluated based on the percent of total possible points they received.

Appendix B. Organizations and Vendors

APLUS+ (Association of Personalized Learning Schools & Services) California is a non-profit advocacy group providing a variety of support services to California charter schools that practice “Personalized Learning” as the organization defines it <http://www.theaplus.org/index.php>. The 40+ schools that are members of the organization are largely, if not entirely, independent study charter schools, though notably that’s not the most prominent element of membership. Instead, whether from the organization’s website or in speaking with founder Jeff Rice, APLUS+ is defined more by its commitment to “personalized learning” as a philosophy rather than independent study as a modality.

APLUS+ is both a movement to advance the Personalized Learning model as an essential and more flexible learning model to address the ever-diverse needs of 21st Century K-12 students, and a membership-based association that supports schools, education resource providers, and individuals who are interested in uniting around Personalized Learning.

California Consortium for Independent Study <http://ccis.org/>

From the organization’s website: The California Consortium for Independent Study (CCIS) is the only professional organization, which supports and promotes the interests of teachers, counselors, paraprofessionals, and administrators working in K-adult independent study.

CCIS provides networking and technical support to both charter and non-charter independent study schools. The organization maintains a conference and event schedule, provides technical resources for school practitioners, and appears to have a close relationship with the California Department of Education- which the state seems to use as a vehicle for communicating to the IS community.

Vendors

Software: As IS schools carry a greater paperwork and reporting burden than classroom-based schools, their demand for tracking and reporting systems increases as well. A few examples:

School Pathways: <http://www.schoolpathways.com/> Features a “Personalized Learning Student Information System” providing an “integrated powerful database solution” for schools including for a variety of purposes. Notably, however, their lineup of clients features a prominent array of IS schools, and in interviews, it’s clear that their software is invaluable in reporting attendance to state officials.

Innovative School Solutions: <http://www.innovativeschoolsolutions.com/> ISS's flagship product, OASIS, is an affordable full-featured student information system geared towards charter schools, described as: Fully integrated managing independent study and site-based student information simultaneously.

Attorneys: As IS schools are uniquely regulated within California’s K12 system, a number of attorneys specialize in serving IS clients. A few decent sized firms serve a large percentage of California’s charter schools and two names in particular come up frequently.

Greg Moser <http://www.procopio.com/attorneys/gregory-v-moser>; and

Lisa Corr <http://www.mymcharterlaw.com/team>