Request for Information
Pursuant to HB26-1428

Submitted to:
The Colorado Department of Education
for Fulfillment of Requirements Pursuant to HB26-1428

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EXECUTIVE SUMMARY

Colorado has a long standing history of providing student and parent choice and promoting innovative educational opportunities for students across the state. Post-pandemic, the state's educational landscape has expanded significantly, and now includes an array of educational delivery models. While the majority of students within the state still attend traditional in-person public schools, enrollment in other educational settings, namely online and part-time homeschool programs (PTHS), have grown substantially in recent years despite total statewide enrollment declining. Between SY2019-20 and SY2025-26, overall student enrollment statewide declined by over 41,000 students (~7%). However, during the same time period online school enrollment grew from 22,022 to 34,043, an increase of just over 12,000 students (~55%) and PTHS increased enrollment between SY2019-20 and SY2025-26 by approximately 10,000 students (8,812 to 18,695; ~112%).

Online Educational Models

Online educational settings include both full- and part-time educational options. In both cases, instruction is provided by a teacher, through various online digital strategies and models:

- ***Online Schools*** - Online schools are standalone schools established to provide education online, with the entire student enrollment classified as online. The school is assigned a school code for accountability purposes and operates with a dedicated administrator, separate budget, and a complete instructional program. Additionally, online schools are responsible for fulfilling all reporting requirements and all state and federally mandated accountability processes.[1]
- ***Online Programs*** - Online programs are distinct from online schools in that they operate as part of the school(s) in which they are housed (typically brick-and-mortar schools). Students enrolled in these programs are included in the enrollment of the larger school, and reporting related to student outcomes, budgets, and other state and federal requirements is incorporated into the reporting for the school as a whole.
- ***Supplemental Online Courses*** - Part-time online options are available through supplemental online learning which enables students to take one or more online courses to augment their existing full-time educational setting.

In a survey conducted as part of the RFI, parents report that online learning provides increased flexibility for students to complete their education, a means for educators to more easily individualize learning for the students they teach, and expanded access to educational options to students across the state.

Part-time Home School Programs

Part-time Homeschool (PTHS) are programs that enable homeschool students to enroll in public school for a portion of the day. These programs began as opportunities for homeschool students to enroll in existing classes through their local school district. More recently, these programs have expanded to include additional activities beyond the standard academic courses typically offered in traditional public

[1] C.R.S. 2025 §§22-30.7-102 https://law.justia.com/codes/colorado/title-22/school-districts/article-30-7/section-22-30-7-102/

schools. PTHS provides homeschool students with the opportunity to complete course work that they may not be otherwise able to complete at home as well as enhance their social interactions both with peers and other adults.

While the evolution of both online learning and PTHS have expanded educational opportunities and choice for Colorado students, the quickly changing landscape has created potential gaps in oversight and transparency which could have negative consequences for student outcomes and school finance. To help address these concerns and questions, the Colorado General Assembly passed House Bill 26-1428 which directed the Colorado Department of Education (CDE) to submit a report that included information and recommendations regarding online learning and PTHS across the state. The report reviewed data available through CDE as well as information provided by Local Education Agencies regarding existing online schools and PTHS programs. Additionally, feedback was provided by parents/guardians of Colorado students, through a publicly available survey and from online learning practitioners through multiple focus groups. Finally a national review of laws, policies, and practices was conducted regarding online learning and publicly available opportunities for homeschool students.

Based on data and information collected and analyzed regarding online education from various sources and stakeholder feedback received, a number of overarching key takeaways were identified.

- **Large variation exists in the space**- There is a large array of educational opportunities that currently exist in Colorado that are all classified collectively as online learning. Schools vary in size, scope, format, expectations, and reach. The variation that currently exists makes it challenging if not impossible to create a one-size-fits-all approach that will be effective in every situation.
- **Data and information gaps create blind spots**- Many significant data gaps exist within the online learning space. A lack of detailed financial data in many cases and limited student outcomes metrics make it difficult to assess whether the students of Colorado are receiving a quality education and the services and support they need to succeed.
- **Existing state oversight structures may be insufficient**- Significant changes in the online space in recent years has resulted in online learning moving beyond the current framework that exists to provide oversight, leaving potential gaps regarding accountability for student outcomes.
- **Increased Use of External Providers Creates Complexity in Oversight and Accountability** - The increased use of private vendors and education service providers has created additional complexity in defining roles and responsibilities related to data reporting, oversight, and accountability. As private entities increasingly provide public education services, questions have emerged regarding the applicability of existing legal requirements and the respective obligations of schools, authorizers, and external providers.

Based on information collected and analyzed regarding PTHS and parent/guardian feedback, several key takeaways were also identified for PTHS.

- **Significant change is already taking place**- As a direct result of amendments L.042 and L.033 to the 2026 School Finance Act (Senate Bill 26-023) the landscape of PTHS is already undergoing significant changes. The ultimate impact of these amendments remains uncertain, given both the recency of their enactment and the availability of enrollment data at the time of publication of this report, but they have the potential to significantly reshape the PTHS landscape.
- **Differences in PTHS should be addressed**- While some local education agencies provide dedicated programs specifically designed for and exclusively offered to homeschool students, others only provide opportunities for students to enroll in existing public school courses. These differences represent significant variations in PTHS across the state.
- **Change will likely need to balance the need for oversight with opportunities for innovation**- PTHS is an educational offering that is unique to Colorado, and has provided expansive and innovative opportunities for homeschool students. However, these opportunities often do not fit into the existing framework of educational opportunities in typical public schools, and as a result, traditional oversight structures are not as effective as they are for more traditional school models.

The online learning and PTHS findings in this report were utilized to develop the full list of recommendations listed below.

Options & Recommendations
Structural Framework
1A: *Develop a more detailed definition of public school to help clarify what constitutes a public school and potentially how they are operated and managed.*
1B: *Create additional designations of Blended and Virtual for existing online schools and programs.*
1C: *Address the structural gap for accountability between single-district online programs and online schools.*
1D: *Conduct further research to effectively address potential changes to funding models across the online educational landscape.*
Online Authorization
2A: *Clarify and strengthen requirements and expectations for all Authorizers of online schools and programs.*
2B: *Require annual reporting and develop a regular review process for single-district online schools and programs as well as multi-district online school Authorizers to enable CDE to ensure continued quality and compliance.*
2C: *Develop a mechanism for the state to revoke authorizing power to address failures in roles and/or responsibilities.*
Education Service Provider Oversight
3A: *Develop a list of approved Educational Service Providers (ESP).*
3B: *Require LEAs authorizing online schools to include specific educational provisions when creating their contracts with Educational Service Providers.*

3C: *Require LEAs authorizing online schools to include specific financial provisions when establishing their contracts with Educational Service Providers.*
3D: *Clarifying what legal obligations apply to LEAs should also apply to an ESP.*
Accountability and Expectations
4A: *Adjustments to the parent opt-out process could be utilized to help increase state assessment participation rates.*
4B: *Adjustment to how parent opt outs are incorporated into the District and School Performance Frameworks.*
4C: *Incentives and/or penalties could be utilized to encourage LEAs to work to increase state testing participation rates.*
4D: *Develop minimum statewide online education expectations for attendance and engagement.*
Certification and Designation
5A: *Require single-district online schools and programs to complete the same application process as MDOLs in order to begin operations.*
5B: *Establish a recurring process of review and recertification for MDOLs.*
5C: *Enhance data requirements and add a periodic eligibility audit to the annual redesignation process for online schools designated as Alternative Education Campuses.*
Supplemental Online Learning
6A: *More clearly define the role of supplemental online programs in the online learning environment and create a clear bright-line between full-time online schools and programs.*
6B: *Develop a list of approved supplemental online service providers and/or ineligible supplemental service providers.*
6C: *Develop increased reporting requirements and oversight practices for all supplemental online providers active within Colorado*
State Designated Supplemental Online Learning
7A: *Require the provider designated as the state's supplemental online learning provider, through the Colorado Empowered Learning program, to provide the same student level data as LEAs are currently mandated to provide.*
7B: *Consideration could be given to the state expanding the type of entity that could administer and manage the state's designated supplemental online learning program.*
7C: *Additional research and consideration could be given to the state reevaluating the role of a designated statewide provider of part-time online learning, along with the corresponding funding structure that supports it.*
Part-time Programs for Homeschool Students
8A: *Conduct a review and in-depth enrollment analysis of part-time programs for homeschool students resulting from significant changes in the program landscape as a result of recent legislative change and expected state board rulemaking.*

8B: *Consideration could be given to providing funding to districts for "opt-in" homeschool students through a tiered or pro-rated scale based on the number of hours the student spends in the classroom.*
8C: *Consideration could be given to limiting course offerings of dedicated part-time programs for homeschool students to only those courses already available through the school running the program and available free of charge to all full-time students.*
8D: *Consideration could be given to a funding stream that would be allocated to dedicated part-time programs for homeschool students, which would be separate from current public school funding.*
8E: *Consideration could be given to eliminating funding to LEPs for part-time programs for homeschool students and instead developing a school choice funding program available to families across the state.*

For a summary list of analysis and research takeaways and further explanations of all recommendations and options presented in this report, see Appendix J.

HOW TO READ THIS REPORT

This report was written to fulfill the requirements of House Bill 26-1428. It contains data compiled and analyzed by the Colorado Department of Education in addition to data collected and analyzed by Dillinger Research and Applied Data from online schools and part-time programs for homeschool students across the state. Feedback on educational opportunities and satisfaction was also collected from parents and guardians of students throughout Colorado. Online leaders and experts were also consulted in focus groups at various points in the process. Additionally, research was conducted on laws, rules, and policies that govern online schools and programs across the country as well as homeschool related funding practices. Finally the report contains a set of options and recommendations developed by Dillinger Research and Applied Data based on the information gathered.

To fulfill those requirements, the report relied on information previously reported to CDE through existing data collections, such as student outcome and enrollment data. Where information was not otherwise available, the department augmented existing data with a one-time data request administered in survey format to Local Education Agencies (LEA) as authorized by H.B.26-1428.

It is important to note that state data collections typically follow an established development cycle. New or revised collections are generally developed in advance, reviewed through the Education Data Advisory Committee (EDAC) process, and communicated to LEAs with sufficient lead time to allow them to update student information systems, financial management systems, or other data-reporting processes before the applicable reporting year begins. These collections also typically flow through CDE's established Data Pipeline and are supported by detailed definitions, layouts, validation processes, and other technical guidance intended to promote consistent reporting across LEAs.

The one-time request for information required under HB 26-1428 did not follow that typical timeline or collection structure. The requirement took effect at the conclusion of a school year, requested information covering prior periods, and provided LEAs a little over one month to compile and submit the requested information. Given the one-time nature of the collection and the limited reporting window, the department administered the request through surveys rather than through CDE's standard Data Pipeline.

The surveys were designed to collect only information not otherwise available to the department. Where feasible, they relied on ranges, percentage bands, or other categorical responses rather than requiring LEAs to generate precise counts or calculations that may not have been readily available from existing systems. The surveys also allowed LEAs to indicate when requested information was not available within the reporting window.

Accordingly, a response indicating that information was "not available" should not strictly be interpreted to mean that the information does not exist. Rather, in some cases, the information may not have been

maintained in a format that could be readily extracted, compiled, or reported within the timeframe provided for this one-time collection. These factors should be considered when interpreting the survey results and the level of precision associated with the reported data, and are highlighted as considerations throughout the options and recommendations.

The report is separated into two main sections, online education and part-time programs for homeschool students. Each section contains a brief background of the educational setting, findings and related recommendations, and key conclusions and takeaways. Findings relevant to each recommendation can be found in the body of the report. Additionally, information gathered during the RFI process, methods utilized to collect data and feedback, survey questions utilized to collect data from outside sources, and some additional information provided by online practitioners can be found in Appendices C-I. Recommendations and a brief description of relevant findings can be found in blue call out boxes for ease of reference.

It should also be noted that recommendations are not intended to be absolute or prescriptive, nor do they represent specific policy directions endorsed by the Colorado State Board of Education, Commissioner of Education, or the Colorado Department of Education. Rather, they are intended to provide policymakers with potential considerations informed by approaches taken in other states, relevant research, and observations regarding Colorado's current policy, practices, and regulatory landscape.

Some recommendations may be mutually exclusive, while others may require additional analysis, refinement, or consideration before implementation. Accordingly, further evaluation and deliberation by policymakers, in some cases, may be warranted to better understand the potential opportunities, implications, tradeoffs, and implementation considerations associated with each recommendation.

ONLINE EDUCATION

HOUSE BILL 26-1428

In May of 2026, the Colorado General Assembly adopted House Bill (H.B.) 26-1428 regarding Administration of Publicly Funded Education Programs. The bill was designed to specifically help address growing questions and concerns regarding the expanding educational landscape of Colorado with a specific focus on online education and Part-time Programs for Homeschool Students (PTHS). H.B. 26-1428 requires the Colorado Department of Education (CDE) to submit a report to the Joint Budget Committee (JBC) by November 1st of 2026. The focus of the report is to collect information regarding online education and PTHS across the state. In addition, a list of potential recommendations based on the information collected must be included for JBC consideration. Given the extremely tight turnaround time for the Request for Information (RFI), the bill authorized CDE to prepare a one-time, survey-based data request regarding any online education and programs/opportunities offered for homeschool students across the state. The RFI also authorized CDE and Colorado Empowered Learning (CEL) to share data for the purpose of evaluating the existing state supported supplemental online programs and their current student outcomes. The final report is required to cover numerous aspects of the current educational landscape including but not limited to descriptions of instructional and financial models, data on numbers and percentages of students participating in various models, common course delivery methods, common contractual and financial arrangements, academic performance and accountability metrics, equity of program access, alignment with state standards, and a fiscal analysis. Recommendations in the final report were required to include but not necessarily be limited to oversight structures, funding changes, additional data needs to assess program quality, student academic growth, student progress and preparedness, as well as alignment to national standards, and curtailing wasteful state spending.

BACKGROUND

The Spectrum of Online Education

Full-time online educational options can be set up to either serve students from a single district or from multiple districts across the state.

Single District Online Schools (SDOLs)

Single-district options can include single-district online schools (SDOL schools) or single-district online programs (SDOL programs). In both cases no more than ten students that reside out-of-district can be enrolled at any time. SDOL schools can enroll 100 or more students and function as a unique school with their own school code. SDOL programs must have fewer than 100 students and do not have a school code. Instead these programs function under the school(s) within the home district. In SY2025-26 there were 19 SDOL schools and 60 reported SDOL programs operating across the state. Approval from the State Board of Education (SBE) is not required to open a SDOL school or program. In both cases participating students are funded at the operating districts per pupil funding level.

Multi-District Online Schools (MDOLs)

Full-time online options that serve students who reside in multiple districts are referred to as multi-district online schools (MDOLs) and may accept students from across the state. MDOLs are not bound by an out-of-district cap as is the case for SDOLs. The governing board of the authorizing Local Educational Agency (LEA), which can be a local school district, a board of cooperative educational services (BOCES), or the Charter School Institute (CSI), approves the MDOL to operate and serves as the school's authorizer. In SY2025-26, there were 44 MDOLs operating across the state. Large variability currently exists among MDOLs with regards to the number of districts served and the percentage of in- and out-of-district students enrolled. At one end of the spectrum, the MDOL 70 Online, operated in the Pueblo County 70 District, serves 2 districts within the state and enrolled 167 students in SY2025-26. Just over 84% of 70 Online's students were in-district, while just over 15% of their students were out-of-district. At the other end of the spectrum, District 49's GOAL Academy served 6,985 students across 146 districts in SY2025-26, with just over 3% of their students residing in-district and just over 96% out-of-district. See Appendix A & B for a full list of online schools and an enrollment and district breakdown. Unlike SDOL schools and programs, MDOLs require approval from SBE before they can operate. Additionally, funding is provided to MDOLs at a unique online per pupil rate.

> Reader Note:
> Defining Student Enrollment
>
> There is a difference between **student membership count** (enrolled as of October Count Day) and **funded pupil count** (eligible for state funding). To remain consistent throughout this report, funded pupil count is used when referencing enrollment numbers.

Online Authorizers

SDOL programs and schools, as well as MDOLs, are created through approval by an online Authorizer. Colorado Revised Statute (C.R.S.) §22-30.7-102[2], defines an Authorizer as a school district, any group of two or more school districts, a BOCES, or CSI that authorizes an online program or school to be established. All four types can authorize MDOLs, however, only single school districts or CSI can be an Authorizer of SDOL programs and schools. Once an online program or school is established, the Authorizer is responsible for overseeing the program or school and ensuring compliance with state and federal requirements. While Authorizers help to ensure that state reporting is completed by the programs and schools they manage, Authorizers themselves are not currently required to report to the state on their roles and responsibilities in this space.

Educational Service Providers (ESPs)

In most cases, all educational and operational components of online schools and programs are administered and managed by the home district, charter, or BOCES. However, some online schools across the state, particularly those schools with higher enrollment totals, contract out some or all components to Education Service Providers (ESPs). ESPs are private outside entities that often provide a range of both educational and non-educational support and services, including but not limited to instructional materials and tools, teaching staff, mentors, advisors, course development, SIS and IT services, gifted and talented, assessment and testing, student scheduling, registration, record services, professional development and training, staff recruitment, special education services, recruitment materials and advertisements, financial administration, student account management services, administrative program staff, compliance, reporting and logistics. As of SY2025-26, 16 online schools contracted with ESPs; all 16 schools were classified as MDOLs. The most commonly reported ESP was Educational Services Colorado, which partnered with 8 of the 16 schools in SY2025-26. For a full list of online schools that contract with ESPs see Appendix A.

Alternative Education Campuses (AECs)

In Colorado, any school, including online schools can have an Alternative Education Campus (AEC) designation. An AEC designated school specializes in serving populations of at least 90% high-risk students and/or students with severe limitations. Existing schools apply with the SBE annually to receive this designation. Schools designated as AECs have some unique state requirements and accountability standards that are tailored to the student population they serve. These unique requirements and standards help to adjust and align expectations regarding student outcomes, growth, and proficiency measures. As of SY2025-26, 10 online schools had an AEC designation, 7 were MDOLs and 3 were SDOL schools. For a full list of online schools designated as AECs see Appendix A.

[2] Authorizer definition, https://law.justia.com/codes/colorado/title-22/school-districts/article-30-7/section-22-30-7-102/

Table 1. Summary Description of Online Schools

Characteristics	Overall Online	MDOLs	SDOLs
Number of Schools	63	44	19
Funded Pupil Count (SY 2025-26)	33,172	30,393	2,779
Number of Schools by School Level (Combined schools are counted multiple times to represent associated school levels)	Elementary (E) = 27 Middle (M) = 45 High (H) = 51	E = 21 M = 32 H = 35	E = 6 M = 13 H = 16
AEC Designation	10	7	3
Charter	6	5	1
ESP Contract	16	16	0

Supplemental Online Learning And Colorado Empowered Learning

Unlike MDOLs, SDOL schools, and SDOL programs that are all intended to be a student's full-time educational setting, supplemental online learning was originally created to provide students with academic opportunities that augment their existing full-time education through the addition of one or more online courses that students would not otherwise have access to. In 2016, H.B. 16-1222[3] was passed to increase the availability of supplemental online education resources through the creation and funding of a statewide supplemental online and blended learning program. Pursuant to section 22-5-119, C.R.S., CDE designates a BOCES, in consultation with the statewide association of BOCES, to lead, manage, and administer the statewide supplemental online and blended learning program. Colorado River BOCES currently serves in this role and operates the program under the Colorado Empowered Learning (CEL) brand. Colorado River BOCES currently contracts with Colorado Digital Learning Solutions (CDLS) to provide state-supported supplemental online courses. In FY2026-27, the state provided $715,225 to CDLS to provide programming statewide. In addition to state funds, CDLS can charge districts for their students to enroll in online courses. Every five years, CDE, in consultation with other entities, is required to review the designation of the administering BOCES and determine whether adjustments are needed. The Colorado River BOCES was first designated to administer the program in 2017 and was re-designated in 2022 for a five-year term that originally extended through June 30, 2026. SB26-023, however, authorized up to a two-year extension. The department, in consultation with the statewide association of BOCES, will review the designation of Colorado River BOCES and determine whether to continue its designation or initiate a process to select a different BOCES to administer the

[3] H.B. 16-1222, https://leg.colorado.gov/bills/hb16-1222

program. In addition to the designated state-supported provider, other supplemental online providers can partner with districts directly to provide supplemental online courses.

Advantages To Online Learning

The State of Colorado has a robust history of preserving and providing parents and students with choice in educational settings, and that commitment to choice has extended to online educational models. Online learning provides a unique educational environment that parents and district leaders report can benefit students who struggle in a traditional classroom. Through surveys and focus groups, parents and district leaders highlighted that the learning models available through the range of online educational settings in Colorado allow students to thrive as a result of flexibility, individualization, and expanded access.

Parents report that flexibility of online learning enables students with learning disabilities, medical issues, or mental health concerns to pace the work appropriately to help overcome these challenges. Additionally, students with Individualized Education Plans (IEPs) and 504 plans can have assignments individualized without the negative stigma that may come from accessibility options being provided in a traditional classroom, while students working to address credit recovery can complete required classes while working full time jobs. Finally, online learning can help ensure that all students have access to the courses they need and want. Gifted and talented students can augment their educational experience to help keep them challenged or get ahead on credits, and students in rural districts can have access to courses they might not otherwise be able to complete due to staffing limitations in their district.

Survey and focus group participants also emphasized that, without online learning as an option, some students may be at greater risk of falling through the cracks, dropping out, struggling to graduate, or missing valuable educational opportunities. In this way, participants described online educational settings across the state as an important resource for supporting student success.

Online Practitioner Comments

"*Asynchronous learning provides students flexibility to work jobs that support their families which is a huge positive.*"

"*Students in need of recovery programs can access flexible schedules which allows them to engage with their curriculum on their own time and supports students up to the age of 21 in obtaining their high school diploma*."

"*Students who struggle with emotional or behavioral needs have been able to access school more meaningfully.*"

"The ability to customize education allows schools to align instruction more intentionally with each student's Individual Career and Academic Plan (ICAP) and differentiate instruction based on individual needs and skill gaps."

"Students who live in rural districts can have access to more expanded course offerings."

"As we prepare learners to be part of global society and the workforce, the ability to learn, connect, collaborate, and communicate in an online environment will translate to stronger workforce readiness."

Parent/Guardian Comments

"The flexibility of being able to work at her pace and on her time has been tremendous for her and our family. Having her be able to achieve and feel confident in herself is amazing. If she needs more time to complete something, she has that time available because she does not need to worry and panic about not being able to complete something."

"Fits in with autistic sensory needs, which is nearly impossible in an in-person setting."

"My child is able to get access to his teachers in real time when he needs help vs waiting until it's convenient for the teachers. It allows him access to learning in a way that fits him and makes him want to engage."

"The level of academic offerings in this online school is significantly higher than traditional schools. The teachers and the courses not only prepare the students for college and real life but the courses are truly engaging."

"Ability to set our own schedule and work at our own pace is what matters most; we can work ahead if needed."

"The special education department is amazing and all of the teachers have worked really well with my student."

"Flexible schedule so my daughter can manage employment and personal health in conjunction with school."

Online Enrollment Trends

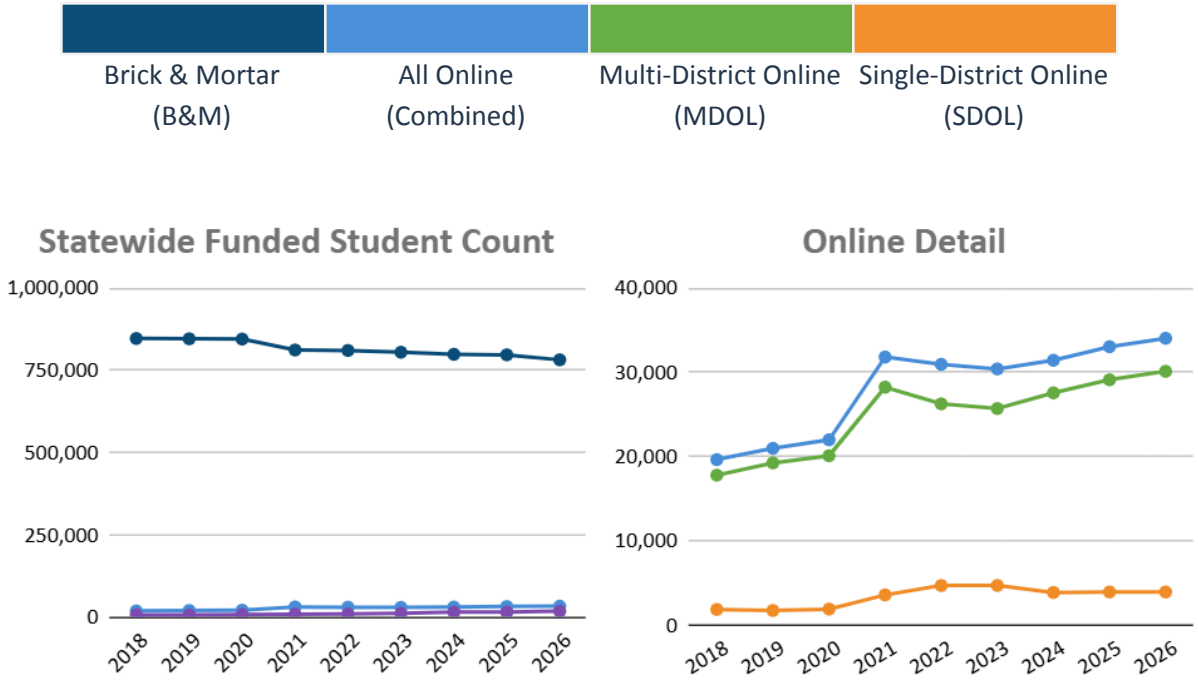
Since SY2017-18, Colorado's overall funded student count has declined by approximately 4.5%, from 874,226 to 834,583 students. The decline has been concentrated in brick and mortar (B&M) schools (in-person district-run public, public charter, and BOCES), where funded enrollment fell by nearly 64,800 students (7.7%). At the same time, overall funded student count for online school enrollment grew from 19,630 students in 2018 to 34,031 in 2026 (an increase of approximately 73%) and remains well above

pre-pandemic levels (Figure 1). Among students funded at a full-time rate, B&M enrollment declined from approximately 782,400 students in 2018 to 779,200 in 2026, after reaching a high of approximately 840,300 in 2020. In contrast, full-time online enrollment increased 77%, from approximately 18,900 students in 2018 to 33,400 in 2026, with the largest increase occurring between 2020 and 2021 during the pandemic.

Data Takeaway

While B&M schools continue to serve the vast majority of Colorado students, a growing number of families are participating in online school with the most growth concentrated around the time of the pandemic (SY2020-21 to SY2022-23).

Figure 1. Funded Student Count By Educational Setting, 2018-2026



Online Demographic Trends

In SY2025-26, students identified as minority represented approximately 52.5% of online enrollment and 51.3% of B&M enrollment, while students with disabilities represented approximately 13.6% of enrollment in both settings. There are some demographic differences for students eligible for free or reduced-price lunch and multilingual learners. Online schools served a higher proportion of students eligible for free or reduced-price lunch (54.5%) than B&M schools (45.1%). On the flip side, multilingual

learners represent approximately 7.5% of online enrollment compared with 15.0% of B&M enrollment in SY2025-26 (Table 2).

Data Takeaway

The demographic breakdown of online schools is shifting to more closely resemble the demographic breakdown found in B&M schools. There are some noteworthy differences, including for students eligible for free or reduced-price lunch (higher percent in online schools) and multilingual learners (higher percent in B&M schools).

Table 2. Breakdown Of Student Subgroup Percentages By Educational Setting.

CDE SY2025-26 Student Subgroups	B&M	Online
Minority students	51.3%	52.5%
Students with disabilities	13.6%	13.6%
Free/reduced-price lunch eligible	45.1%	54.5%
Multilingual learners	15.0%	7.5%

FINDINGS, RECOMMENDATIONS, & OPTIONS

Structural Framework

1A STRUCTURAL FRAMEWORK RECOMMENDATION

Develop a more detailed definition of public school to help clarify what constitutes a public school and potentially how they are operated and managed.

The statutory definition of public school is a school that derives its support, in whole or in part, from moneys raised by a general state, county, or district tax. This broad definition leaves extensive room for interpretation and does not account for the evolution of new learning models that are a part of the landscape in Colorado. When creating new legislation, State Board of Education rules, or Colorado Department of Education practices, such a vague definition can make effective adjustments challenging. Clarifying minimum conditions and standards that constitute recognition of a public school may help to address structural questions such as authorizing practices, funding levels and applicable legal requirements. While many states have yet to develop more detailed definitions of public school, the state of California has created a multi-part definition that brings some clarity to the subject. Additionally, Massachusetts defines public school beyond the limitations of funding streams. Utilizing these states definitions as a starting point could go a long way to helping make future state reform more effective.

Current Public School Definition

At present, Colorado utilizes a very broad definition of public school in state statute; a school that derives its support, in whole or in part, from moneys raised by a general state, county, or district tax[4]. This definition leaves ambiguity regarding how public funds can be used to support educational options across the state or ensure consistency regarding the application of state legislation, SBE rules, or CDE practices that should work to oversee and govern these entities. Significant variation exists across Colorado's educational landscape, highlighting the need for greater clarity in how different educational options are defined and distinguished. A clearer and more detailed definition of what constitutes a public school would provide greater consistency and transparency in how these educational options are understood and would support stronger, more consistent oversight across the state.

Public School Definition In Other States

Numerous components to a potential expanded definition can and should be considered by lawmakers. SBE members and CDE personnel should also be included in the process of defining a public school. The state of California has developed a definition of public school that has details including authorization and operations, credentialing of teachers and administrators, administration of statewide assessments, and

[4] Colorado Definition, https://olls.info/crs/crs2026-title-22.pdf

student records[5]. Additionally, California defines the term "school" as well, which helps to further clarify the distinctions that differentiate all schools from those classified as public. Utilizing other states' definitions as a starting point could help Colorado to clarify both what constitutes a public school and how public schools should be authorized, operated, and funded. Massachusetts[6] has also developed a definition that moves beyond funding and incorporates operational components for clarity. While not every component covered in the California and Massachusetts definitions may be relevant to Colorado, consideration of various options would likely be beneficial.

1B STRUCTURAL FRAMEWORK RECOMMENDATION

Create additional designations of Blended and Virtual for existing online schools and programs.

Information gathered through the online school survey and focus groups demonstrated that a large distinguishing factor between existing online schools is whether a required in-person class component exists. While some schools (Virtual) may provide optional in-person opportunities for students, other schools (Blended) have a set number of required in-person days and a set number of required virtual days within a single course. Currently, these two distinct formats are both classified as online schools or programs; however, the difference sometimes necessitates unique educational, operational, and funding considerations. These additional designations could help to better align future law, rule, and practice across the online landscape. The states of Texas and Michigan both differentiate these two formats.

Current In-Person Opportunities

Data provided from online schools through the RFI process demonstrated that the vast majority of online schools surveyed provide some level of in-person programming or support for all students. Sixty of the 62 (96.8%) online schools surveyed reported that at least some in-person components were available to the students they serve. While many similarities were seen regarding the types of in-person opportunities available, there were noticeable differences regarding the percentage of students that participated. Common opportunities across all schools included in-person testing, academic support services, and wraparound services. A number of online schools also indicated that other enrichment and extracurricular activities were available including sports leagues, outdoor educational programs, college and career exploration opportunities, field trips, social and community-building activities, prom, graduation, and leadership retreats. While the type of in-person opportunities was relatively consistent across all online school designations, substantial differences were seen when comparing the percentage of students that participate in in-person activities. SDOL schools only represent 18 of the 62 online schools (29%) that provided information through the survey process, however they represent 45.4% of the 22 online schools that indicated >90% of their students participate in in-person opportunities.

[5] California Department of Education, Definition of a School, https://www.cde.ca.gov/ds/si/ds/dos.asp

[6] Massachusetts, https://profiles.doe.mass.edu/profiles/general.aspx?topNavId=1&orgcode=39020900&orgtypecode=6&leftNavId=102&

Additionally, none of the 16 ESP contracted online schools indicated >90% of their students participated in-person and only one school reported >50% utilized in-person options.

Data Takeaways

While in-person opportunities are common across all online schools in Colorado, single-district online schools are more likely to have the majority of their students participating in these opportunities.

Potential Blended And Virtual Distinction

While not all in-person opportunities will result in the same demands on every online school, consideration should be given to the potential for additional requirements, both financial and operational, when online schools have large populations of students that must be accommodated in-person in addition to virtually. Furthermore, online schools that require students to participate in both in-person and virtual instruction on a regular basis are likely responsible for additional demands and considerations that would not be needed in a fully virtual setting. At a minimum, consideration should be given to differentiating virtual vs blended online learning environments to help assess potential differences required for effective state oversight. Virtual learning could be defined as an education setting that may provide in-person opportunities but does not require students to engage in instructional time both in-person at a physical location and virtually through online means. Conversely, blended learning could be defined as an education setting that requires students to participate both in-person and virtual to complete their allotted instructional time. The states of Texas[7] and Michigan[8] currently distinguish between these two online formats.

Online Practitioner Comments

"I think one of the most important things we can do is make sure we are not treating all remote schools as though they operate the same way."

"There are major misconceptions about schools. Not all online schools are the same, so it is difficult to differentiate or create policy when there are such differences in the type of instruction, staffing, etc. There is a huge need for nuance."

"Accountability is great, but it is hard to apply equitably to online schools that have extremely different contexts and a lot of nuance on how they function and who they serve. Accountability has to be connected to the reality of how online schools work. What kind of accountability system would account

[7] Texas Virtual/Hybrid Guidance, https://tea.texas.gov/taa-letters/sb-569-overview-virtual-and-hybrid-learning-guidance-2025-2026-school-year
[8] Michigan State School Aid Act of 1979, https://legislature.mi.gov/Laws/MCL?objectName=mcl-388-1698

for the complexity across the online ecosystem."

"*Online lumps all online schools into one category but they all operate so differently and should be accounted for with nuance. Not all online schools are created equal but they are expected to operate at the same standards. Online education is not a "one size fits all" paradigm.*"

"Blended synchronous programs are showing great promise in re-engaging and supporting students with higher needs who may have previously been at risk of dropping out. These types of programs are more expensive to operate and support, but they can provide a significant return on investment by re-engaging students, helping them graduate, and providing the necessary support to keep them on track."

"*Online success centers that provide a means for students to come in person, and participate in workshops help to foster student success.*"

1C STRUCTURAL FRAMEWORK RECOMMENDATION

Address the structural gap for accountability between single-district online programs and online schools.

Currently, Local Education Agencies (LEAs) authorizing single-district online programs are required to submit program information to the Colorado Department of Education (CDE); however, some begin operating these programs without notifying the department. Additionally, CDE has no authority over, or visibility into, the enrollment or performance of these programs. Data for students attending these programs are attributed to and aggregated within their assigned brick-and-mortar school's data, making it impossible to separately evaluate the performance of students in the online program. Currently, CDE lacks an enforcement mechanism to prevent an LEA from fragmenting a single online program into multiple, nominally distinct programs. This gap could allow a single LEA to operate multiple independent online programs, each serving up to 10 out-of-district students, effectively bypassing the requirement for multi-district online school certification. Requiring LEAs to apply to CDE for a program code would allow an initial line of sight into the performance of these programs and then provide necessary information for possible future actions.

Need For SDOL Program Data

Data collection for the RFI process focused on single-district online schools and MDOLs. Data from single-district online programs is currently not available to CDE disaggregated from the B&M school that the program is assigned to. This makes clear evaluation of student outcomes and program effectiveness impossible at the state level. Although the lack of disaggregated data does not necessarily guarantee a lack of student success or program quality, it does call into question transparency and accountability. By requiring LEAs to apply for a program code from CDE if they open a single-district online program, the

state would gain a valuable line of sight into these growing programs and help ensure that students participating are receiving a quality education.

1D STRUCTURAL FRAMEWORK RECOMMENDATION

Conduct further research to effectively address potential changes to funding models across the online educational landscape.

Information gathered through the RFI process highlights the extensive diversity that exists within Colorado's online landscape. While a number of the recommendations included in this report provide possible avenues for cost savings, adjustments to current per-pupil funding rates require more extensive review that includes consideration of the diversity of online school and program formats, locations, focus areas, and student populations served. Online education, regardless of its delivery model, requires many of the same essential components as traditional brick-and-mortar schools. Accordingly, a comprehensive assessment of these components is necessary to ensure funding is adequate to support student success. Consideration should also be given to distinctions between single-district online schools and programs, mutli-district online schools, potential virtual vs blended designations, and supplemental vs full-time learning. Numerous unique funding formulas exist across the country with regards to online learning, however, it should be noted multiple states including New Mexico, Texas, and Florida currently fund online students at the same per-pupil rate as their in-person counterparts.

Current Funding Model

The Colorado Finance Act (C.R.S §24-54-101[9]) specifies the exact calculation utilized to determine per pupil funding across the state. With the exception of MDOL students, who are funded at a separate statutory rate, the school finance formula provides districts with funding based on each student that is enrolled at a standard baseline funding amount (base funding per pupil). Adjustments are then made based on additional funding criteria for students and districts. Factors such as students identified as At-Risk or Multilingual Learners, size and cost of living of the district, and geographic indicator of the district location can all lead to increases in the funding amount. The district per pupil rate (District PPR) varies widely across the state, from a low of $11,048 to a high of $47,253 in SY2025-26. The average statewide PPR for SY2025-26 was $11,876. Students in public schools only receive the full allotted PPR if they are scheduled for at-least 360 hours of instructional time during the fall semester. Students scheduled for less than 360 hours but more than 90 hours of instructional time during the fall semester are allotted at part-time PPR equaling half of the calculated rate.

Current SDOL Funding

Funding for SDOL schools and programs are calculated using the school finance formula outlined above. Calculations for SDOL schools and programs begin with the set base per pupil funding amount and are

[9] Colorado School Finance Act, https://codes.findlaw.com/co/title-24-government-state/co-rev-st-sect-24-54-101/

adjusted according to the student and district factors. Instructional time for students in SDOL schools and programs is based on equivalencies to a direct instructional course with the same assigned number of semester credits as a B&M school in the district.

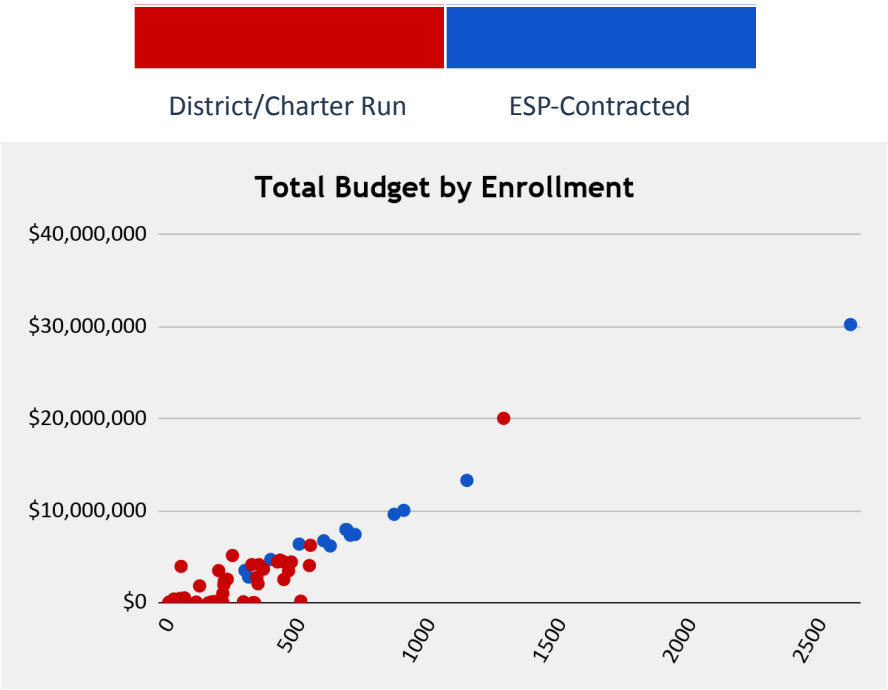
Current MDOL Funding

Multi-district online schools are unique in that they are funded utilizing a statewide online per-pupil revenue rate (Online PPR), rather than through the school finance formula. In SY2025-26 the Online PPR baseline amount was $10,480, which is $1,396 less than the statewide average District PPR amount of $11,876. The district adjustment factors (e.g. percentage of At-Risk, size of district, etc.) are not currently utilized for calculating adjustments to the Online PPR. Instructional time equivalencies for MDOLs are determined the same as SDOL schools and programs.

ESP And District/Charter-Run Budget Differences

Based on the information shared by online schools during the RFI process, substantial differences were identified across online settings regarding total budget allocations and apparent financial transparency regarding spending. On average, schools that contracted with an Educational Service Provider (ESP) reported much larger budgets allocated to their ESP for contracted services compared to budgets reported by district/charter-run schools for similar internally managed services. A detailed comparison of potential differences in services provided by ESPs versus services managed internally by district/charter-run schools was not possible with the data received for the RFI process. However, no substantial differences were identified when comparing major areas budgeted by the two types of organizations. Both ESP contracted and district/charter-run schools budget for areas such as professional development, curriculum & testing, and technology & platforms. On average the ESP contracted schools reported payments to their ESPs of approximately $8,800,000 with a median of $7,413,400. The largest payment reported was $30,247,525 and the smallest payment was $2,822,413. Conversely, district/charter-run online schools reported an average budgeted amount of approximately $2,500,000 with a median amount of $2,043,414. The highest reported amount budgeted was $20,062,808 and the lowest was $9,000 (Figure 2). It should be noted that ESP contracted schools typically serve much larger populations of students which could influence the variation seen in budgetary information.

Figure 2. Total Reported Budget Allocation By Student Population



Data Takeaway

On average schools with larger enrollment tend to contract with ESPs compared to schools with smaller enrollment. As a result, budget allocation for schools that contract with ESPs tend to be larger compared to district/charter-run schools.

Variation In Budget Allocations

While funding allocations did appear to generally increase with increasing enrollment, more detailed information regarding expenditures and budgetary allocation were less well defined. The survey asked respondents to self-attribute expenses within their budget and therefore it is important to note that these expenditures are self-reported and self-categorized and, therefore, may vary across expenditure categories.

All online schools reported budget allocations being made in a variety of areas, however, overall district/charter-run online schools reported allocations in a larger variety of areas compared to ESP contracted schools. Multiple ESP contracted online schools reported that they do not receive a detailed breakdown of expenditures from their ESPs potentially leading to the limited budgetary information in some areas. Table 3 shows a breakdown of the number and percentage of online schools that indicated their budgets were allocated in specific areas.

Table 3. Number And Percentage Of LEA Self-Reported Expenditures By Category

Area Of Allocation	District/Charter-Run	ESP Contracted
Building Maintenance	23 (50.0%)	6 (37.5%)
Building Operations	23 (50.0%)	15 (93.8%)
Classroom Materials	36 (78.3%)	14 (87.5%)
Co-curricular Activities	30 (65.2%)	14 (87.5%)
Curriculum & Testing	36 (78.3%)	1 (6.3%)
Food Services	8 (17.4%)	0 (0%)
Mandated Special Education	25 (54.3%)	16 (100%)
Marketing & Communications	22 (47.8%)	1 (6.3%)
Professional Development	36 (78.3%)	16 (100%)
Office Materials	39 (84.8%)	16 (100%)
Technology & Platforms	41 (89.1%)	16 (100%)
Technology Support	22 (47.8%)	16 (100%)
Transportation	12 (26.1%)	8 (50.0%)
Other	7 (15.2%)	1 (6.3%)

Co-curricular And Marketing/Communication Allocations

Additional information was collected regarding specific budget amounts allocated to co-curricular activities and marketing and communications. Fourteen of the 16 ESP contracted schools (87.5%) that indicated funding had been budgeted for co-curricular activities, the average budget amount was $106,423 with a median of $61,593. The highest amount budgeted for co-curriculars was $401,500 and the lowest amount was $4,120. The thirty district/charter-run online schools (65.2% of all district/charter-run schools) that budget for co-curriculars, budgeted on average $28,885 with a median of $4,127. The highest amount reported was $559,189 and the lowest was $500. The variation identified between the two types of online schools could be attributed to the higher average enrollment in ESP contracted schools. Only one ESP contracted school (6.2%) reported any funds being allocated to marketing & communications, although multiple schools indicated that their ESP does not provide a detailed breakdown of all expenditures. Twenty-two district/charter-run schools (47.8%) reported budgeting for marketing and communications, with an average expenditure of $29,358 and a median of

$2,000. Marketing budgets varied substantially with the highest budget reported at $349,244 and the lowest $140. To review additional specific details provided by ESP contracted schools regarding ESP services and total payments to ESP see Appendix D.

Data Takeaway

Only one ESP contracted online school reported expenditures for marketing and communication, however multiple respondents also indicated that they do not receive detailed financial breakdowns regarding expenditures made by their contracted ESP.

Need For Financial Transparency

Limited detailed financial information is available for online schools, especially those that contract with an ESP. As a result of this limited information, it is currently difficult to truly determine how budgets are utilized, or if expenditures amounts are appropriately allocated by area. Without more detailed budgetary information it is difficult to make informed recommendations regarding online education funding. More detailed reporting and increased transparency is required before effective legislation can be developed and implemented.

Online Funding Models In Other States

Although more information is required before Colorado can adequately tackle questions of education funding, online learning funding models from other states can be referenced when considering potential options for change. Funding structures vary widely across the country. While some states including New Mexico[10] and Texas[11] provide online schools with essentially identical funding compared to B&M schools, all other states reviewed had unique funding formulas or mechanisms in place. Arizona[12] provides online schools 95% per pupil funding for full-time students and 85% per pupil funding for part-time students. California[13] provides funding based on Average Daily Attendance (ADA), Kansas[14] has an online school specific funding formula, and Utah[15] provides specific funding levels based on the specific type of course being taken. Massachusetts[16] allows the state board to set tuition rates which are paid by the sending district. Finally, Florida[17] and New York[18] provide a set per pupil amount, however, payment is only provided to the online school following successful completion by the student. A further investigation of

[10] New Mexico, https://www.nmlegis.gov/Sessions/26%20Regular/bills/house/HB0253.HTML
[11] Texas Virtual/Hybrid Guidance, https://tea.texas.gov/taa-letters/sb-569-overview-virtual-and-hybrid-learning-guidance-2025-2026-school-year
[12] Arizona Online Instruction, https://www.azleg.gov/ars/15/00808.htm
[13] California, https://www.cde.ca.gov/sp/ch/nclrbifunddet.asp
[14] Kansas, https://kslegislature.gov/b2025_26/laws/072_000_0000_chapter/072_051_0000_article/072_051_0080_section/072_051_0080_k
[15] Utah, https://le.utah.gov/xcode/Title53F/Chapter4/53F-4-S503.html
[16] Massachusetts, https://www.doe.mass.edu/lawsregs/603cmr52.html?section=07
[17] Florida, https://www.fldoe.org/schools/school-choice/virtual-edu/statutes-rules.stml
[18] New York, https://www.nysed.gov/edtech/virtual-learning

various state funding models across the country could help Colorado to consider future changes to the funding rate for online schools and programs.

Online Practitioner Comments

"*We have so many different things going on, online, blended, in person. It doesn't cost less than a B&M school, it costs more. There is a complexity of work at an online school that is deeply misunderstood and inadequately funded.*"

"*There is a big assumption that online schools cost less than brick and mortar, but that's not true. The costs are just distributed differently.*"

"*Online students require just as much if not more attention from special service providers and teachers but are funded at a lower rate.*"

"The question should not be whether online learners require fewer resources because they are not physically present in a school building. The question should be whether we are providing the right resources to ensure that students who have historically struggled to engage have a meaningful opportunity to succeed."

"If we expect online schools to provide robust, engaging, and rigorous learning experiences, students must have access to devices and connectivity capable of supporting those experiences."

"As the number of students choosing online and customized learning continues to grow, funding formulas should recognize the staffing, technology, student support, and instructional resources necessary to ensure these students receive an education that is equally rigorous, personalized, and outcome-focused."

"Ultimately, I think Colorado has an opportunity to create a funding system that does four things: Fund the student. Recognize the instructional model. Require quality. Preserve access."

"*Preserve student-need weighting regardless of modality. At-risk, special education, multilingual learner, gifted, intervention, and other student-based funding should follow students into remote schools in the same way it follows students into brick-and-mortar schools"*

Parent/Guardian Comments

"Allows SpEd courses to be more discreet for my learners thus not cause it to affect their identity based on assumptions by peers and staff."

"Is accommodating to her EDS syndrome for when she has chronic pain."

"More flexibility to meet the needs of a neurodivergent, 2e learner."

"My son has Aspergers, so online school provides him with the ability to take his time and think things through. He can sometimes take 5 or more minutes to decide how to word a single sentence."

"The individualized education that he can get with my support due to his executive functioning and ADHD issues. He also has a hard time having enough energy all day in the Brick + Mortar because his mental energy is spent by lunchtime in a regular school system."

Online Authorization

2A ONLINE AUTHORIZATION RECOMMENDATION
Clarify and strengthen requirements and expectations for all Authorizers of online schools and programs.
Local Education Agencies serve as authorizers of online schools and programs, and are currently provided with substantial latitude to establish online schools that serve students across the state. While Authorizers are expected to ensure that the online schools and programs they oversee adhere to relevant state statute, the specifics regarding how many educational and operational components are set up and handled is left to the Authorizer to determine. Clarification on state expectations regarding areas such as financial management, curriculum and instruction, data gathering, analysis, and reporting, as well as employment and contractor policies and procedures could help strengthen the online educational space as a whole by incorporating more consistency and accountability.

Authorizer's Roles And Responsibilities

District-run public schools are established by the local Board of Education. Charter schools have two paths of authorization as either (1) authorized by the local Board of Education if they are part of the district or (2) authorized by the Charter School Institute (CSI) as part of the state's charter network. Authorization of online schools and programs varies depending on the type. Single-district online schools and MDOLs are authorized by their home district, CSI, or BOCES. The district or CSI must meet basic academic and operational quality standards contained within SBE rule Code of Colorado Regulations CCR 301-71[19], and apply through CDE for a school code. However, in most cases, Authorizers are provided

[19] Quality Standards for Online Schools and Programs, https://www.sos.state.co.us/CCR/GenerateRulePdf.do?ruleVersionId=11503&fileName=1%20CCR%20301-71

with substantial latitude when determining the specific methods for addressing these standards leaving room for variation and inconsistencies across the online landscape.

Need For Clarity Of Authorizer's Roles And Responsibilities

Several examples of provisions within the CCR 301-71 rules highlight areas of potential ambiguity that could be clarified to help strengthen oversight and provide clear expectations.

- *3.2.5 Online School or Program demonstrates levels of attainment of statewide performance indicators that meet expectations established by the Department's annual performance review as described in C.R.S. 22-11-210*[20]*.*
    - CDE data from SY2025-26 demonstrated that participation of online students in statewide assessments fell to 39%. Statewide, MDOLs test participation levels were only 37%. These extremely low levels of participation make it difficult for CDE to accurately assess levels of attainment.
- *3.2.6 The Online School's or Program's Teachers use ongoing, research based formative and summative assessments to measure student academic performance. Students have varied opportunities to demonstrate mastery of skills, show academic progress, and receive meaningful feedback on their learning.*
    - Based on information provided by online schools for the RFI process, all schools provide at least one type of assessment, however, in multiple instances schools noted that the assessment provided was given three times a year. While this does not eliminate the possibility that additional formative and summative assessments are being provided throughout the course, it does highlight a potential need for further clarification regarding assessment expectations.
- *3.2.8 An Online School or Program follows policies for tracking enrollment, attendance, participation, and truancy. The policy includes documentation of Teacher/student interaction.*
    - Policies provided by online schools who provided information for the RFI process demonstrated huge variability with regards to policies tracking attendance and teacher/student interactions. Some existing policies leave room for essentially no teacher/student interaction to take place. Additionally, some policies would enable students to be counted as in attendance for simply logging into a Learning Management System and then immediately logging out. Ensuring that online students don't "fall through the cracks" is critical to success and attendance and teacher/student interaction are important components.

Local control enables Authorizers to make decisions that best serve their students and communities, and it must be balanced with the need for effective state oversight and clear roles and responsibilities for Authorizers. Variation in policies and practices does not necessarily indicate that Authorizers are failing

[20] C.R.S. 22-11-210, https://codes.findlaw.com/co/title-22-education/co-rev-st-sect-22-11-210/

to meet their responsibilities or that students are not being well served; however, greater clarity and consistency in requirements can help reduce potential gaps in oversight and accountability.

Takeaway

Potential ambiguity exists regarding the roles and responsibilities of online Authorizers.

2B ONLINE AUTHORIZATION RECOMMENDATION

Require annual reporting and develop a regular review process for single-district online schools and programs as well as multi-district online school Authorizers to enable the Colorado Department of Education to ensure continued quality and compliance.

Once an online school or program is established, Authorizers' ongoing responsibilities with regards to academic, operational, financial, and compliance oversight are not reviewed, leaving room for potential issues that could impact both the students served and the state at large. While local autonomy and control has always been a defining feature of Colorado's educational landscape, Authorizers' continued roles and responsibilities in the online educational space should be periodically evaluated to ensure that they continue to adhere to and carry out their responsibilities. The development and implementation of a regular cycle of Authorizer review would help to ensure responsibilities regarding oversight are maintained. The states of Minnesota and Tennessee require annual reports and regular performance evaluations for all Authorizers.

Authorizer's Continued Roles And Responsibilities

Once an online school or program is established by an Authorizer, oversight is largely handled at the local level. While online schools are responsible for providing the state with statutory requirements including budgetary requirements and academic measures regarding student performance, Authorizers are not currently required to provide information on a regular basis to CDE regarding their oversight roles and responsibilities. Authorizers maintain continued responsibilities with regards to academic, operational, financial, and compliance oversight of schools once they are established, however those roles and responsibilities are not always defined leaving room for potential issues that could impact both the students served and the state at large (Recommendation 2A).

Authorizer Reporting And Review In Other States

Authorizer annual reports and performance evaluations are not currently required for online Authorizers in Colorado. However, a number of states across the country do require Authorizers to complete both

annual reports and performance reviews at regular intervals. Tennessee[21], Minnesota[22], Michigan[23], and Florida[24] all required annual reports for Authorizers. In each case the requirements and standards are based on charter school statute and rule, however, all contain extensive requirements and information to be shared from the Authorizer. Michigan's annual report for Authorizers requires academic, operational, and financial performance outcome data. Minnesota requires a breakdown of income and expenditures, and Florida additionally collects information regarding alignment of policies and practices with state standards. In addition to annual reporting requirements for Authorizers, Minnesota[25] and Tennessee[26] each require performance evaluations. Minnesota's evaluation process works to set clear expectations, ensure accountability and fulfillment of applications, as well as promote excellence and evaluate performance through continuous improvement. Performance reviews occur every five years or more frequently if requested by an interested party. Tennessee's process evaluates Authorizers in a number of areas including financial resources, performance standards, protecting student rights, public reporting, and provisions for educational service providers. Evaluations take place at least every two years and Authorizers complete a self-assessment on off years.

Research Takeaway

While a number of states require annual reporting and have cyclical review processes in place for all active Authorizers, Colorado does not currently have comparable requirements or processes in place.

2C ONLINE AUTHORIZATION RECOMMENDATION

Develop a mechanism for the state to revoke authorizing power to address failures in roles and/or responsibilities.

Authorizers that demonstrate continued failures in oversight and/or responsibilities should have authorizing power revoked. Minnesota law allows the Department of Education Commissioner to terminate Authorizers' power to charter a school if it is found that they didn't meet state mandated requirements.

[21] Tennessee, https://www.tn.gov/sbe/charter-schools/authorizer-reporting-requirements.html
[22] Minnesota, https://education.mn.gov/MDE/dse/chart/aures/
[23] Michigan, https://www.michiganauthorizers.com/publication
[24] Florida, https://www.fldoe.org/schools/school-choice/charter-schools/authorizers/
[25] Minnesota, https://education.mn.gov/MDE/dse/chart/auth/
[26] Tennessee, https://www.tn.gov/sbe/charter-schools/authorizer-evaluations.html

Need For Consequences And Corrective Actions

If Authorizers fail to meet their duties and/or statutory requirements, mechanisms should be in place to ensure corrections are made or authorizing power is removed. Minnesota[27] and Michigan[28] allow their Departments of Education to revoke the Authorizer's power if significant oversights or failures are identified. Minnesota's Commissioner of Education can institute corrective actions for any Authorizer (which can include terminating all active contracts) if the Authorizer fails to demonstrate responsibilities, violates terms of the charter contract, has unsatisfactory performance, or any cause of legally sufficient reason to take corrective action. In Michigan, the Superintendent of Public Instruction can suspend authorizing power if it is determined that the Authorizer is not completing its oversight roles and responsibilities.

Ensuring that the state has mechanisms in place to address potential failures or misconduct by online Authorizers is critical to help ensure online students in Colorado have access to a quality education. In conjunction with annual reporting and a performance evaluation cycle, the power for the state to revoke Authorization will go a long way to ensuring high quality online schools and programs.

Oversight for Educational Service Providers Managing Multi-district or Single-district Schools

3A ESP OVERSIGHT RECOMMENDATION
Develop a list of approved Educational Service Providers.
Data provided from online schools for the RFI process brings to light potential issues in transparency regarding Education Service Providers that contract to operate online schools across the state. While a lack of clear information does not necessarily mean that issues exist, it does highlight the opportunity for further transparency and greater oversight in some areas. Some states, such as Florida, create lists of approved service providers that districts and schools are allowed to contract with for educational and non-educational services. The list is established based on research and review conducted by the Department of Education and reapproval is required on an ongoing basis. A similar list in Colorado, regarding potential Education Service Providers could bring more transparency to the space and simultaneously could help to create a more competitive environment, thus potentially lowering costs. If an approved Education Service Provider list were created in Colorado, online schools and programs should only be eligible for state funding if they contract with approved entities.

[27] Minnesota, https://law.justia.com/codes/minnesota/2011/120-129b/124d/124d-10/
[28] Michigan, https://www.legislature.mi.gov/Laws/MCL?objectName=mcl-380-502

Services Provided By Educational Service Providers

Information provided from online schools across the state who contract with ESPs for educational and non-educational services highlights the diversity of areas these organizations can be involved in managing and administering. Across the 16 ESP contracted online schools, a number of service providers were identified including Educational Services Colorado, K12 Incorporated, Pearson Education, Stride, and Williamsburg Academy. The most common provider was Educational Services Colorado which was named as a partner for 8 of the 16 schools (50%). ESP contracted online schools reported a broad range of services provided by their ESP. Services typically focused on classroom related services and/or school operations. Classroom related services included but were not limited to instructional materials and tools, teaching staff, mentors, advisors, course development, student information systems (SIS) and information technology (IT) services, gifted and talented, assessment and testing, student scheduling, registration, and record services, professional development and training, staff recruitment and special education services. School operations services included but were not limited to recruitment materials and advertisements, financial administration, student account management services, administrative program staff, compliance, reporting and logistics.

Contract Provisions Are Limited

Although ESP contracted schools reported that their provider(s) handled numerous educational and non-educational components of the online school, a majority appeared to have very limited provisions within their contracts regarding specifics for educational delivery or financial disclosures. While a lack of such provisions does not necessarily indicate an inherent problem in administration or management of, it does highlight a deficiency in transparency. The state of Florida[29] maintains a list of vetted and approved program and course providers that public school districts across the state can utilize. A similar list in Colorado could help to ensure that ESPs contracted by online schools have been properly vetted and are adhering to current laws, increasing transparency across the state. ESPs could be reviewed for approval by CDE on a 2-3 year cycle. The review could involve an application process and potentially a "site visit" at an existing location.

[29] Florida Approved Provider List, https://www.fldoe.org/schools/school-choice/virtual-edu/provider-resources/approved-providers/

3B ESP OVERSIGHT RECOMMENDATION

Require Local Education Agencies authorizing online schools to include specific educational provisions when creating their contracts with Educational Service Providers.

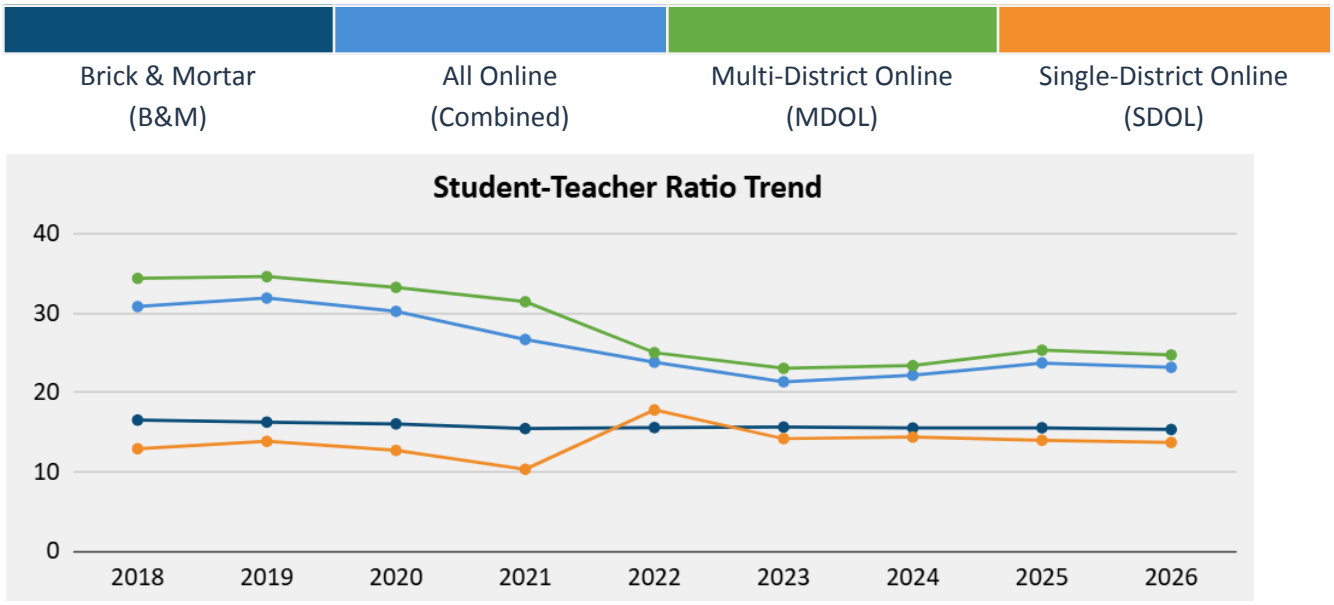
Information gathered through the RFI process demonstrated that online schools that contract with Education Service Providers in many cases lack a detailed picture of the full educational scope of their providers. To help maximize transparency and ensure Colorado students are receiving a quality education, the state should establish consistent educational requirements that Authorizers must include in contracts with ESPs. These provisions should include but not necessarily be limited to, maximum allowable class sizes, maximum allowable student-to-teacher ratios, and the prohibition of individual teachers being utilized to teach Colorado and non-Colorado students, either within the same section or across sections.

Student-Teacher Ratios

CDE annually calculates student-teacher ratios across multiple educational settings, based upon personnel reported in teacher classifications (i.e., Regular Teacher, Special Education Teacher, Permanent Substitute Teacher, and Title I Teacher). In SY2025-26, online schools reported approximately 23 students per teacher, compared with 15 students per teacher in B&M schools. However, this gap has narrowed considerably: the online ratio declined from approximately 31:1 in SY2017-18 to 23:1 in SY2025-26, while the B&M ratio remained relatively stable.

When disaggregated further by type of online school, MDOLs reported approximately 25 students per teacher, while SDOLs reported approximately 14 students per teacher, slightly below B&M schools (Figure 3). These findings suggest that higher student-teacher ratios are not characteristic of all online schools but are concentrated primarily among MDOLs. It should be noted however that SDOLs tend to have lower enrollment overall compared to other educational settings which could influence the student-teacher ratios. While statewide ratios for all online schools is 23:1, ESP contracted online schools collectively had a student teacher ratio of 40:1.

Figure 3. Student-Teacher Ratios, 2018-2026



Data Takeaway

Student-teacher ratios differ substantially by school model, with the largest ratios concentrated in multi-district online schools. The ratio is even higher for ESP Contracted schools.

Average Class Size in Online Schools

Virtual classrooms eliminate the need for physical space to accommodate students, providing an opportunity for much higher enrollment in single classes than would otherwise be possible in a B&M setting. They can also use different staffing models that are not necessarily reflected in student teacher ratios discussed in the previous section.

Just like with the student-teacher ratios, there is still variability in class sizes when breaking down by type of online school. To better understand class size, the survey requested information not consistently available through state reported collections, including details regarding the largest class sizes. For participants in the survey, district/charter-run online schools on average appear to have smaller class sizes compared to ESP contracted schools. Additionally, SDOL schools appear to typically have smaller class sizes compared to MDOLs. Table 4 shows the variation that exists across online schools by designation. It should be noted that the data provided only speaks to the largest class sizes across online school types and multiple schools for each type did not provide data regarding class size. Very few ESP contracted schools provided information regarding their largest class size for the RFI process.

Table 4. Largest Single Course Class Size Reported By Online School Type

Online School Type	Average	Median	#(%) Schools Reporting
All online schools	69	43	40 (64.5%)
District/charter run	62	41	38 (82.6%)
ESP contracted	92	68	2 (12.5%)
SDOL	48	26	11 (61.1%)
MDOL	67	47	29 (65.9%)

Lack Of Provisions Regarding Class Size

Maximum class size and maximum student-teacher ratios are a potential concern for all online school types, however, given the lack of available information for ESP contracted schools, further oversight and transparency seems warranted. All of the 16 ESP contracted online schools indicated that they did not have a current provision in their contract regarding either the maximum number of students within a course section or the maximum student-to-teacher ratios. Standard provision requirements for online schools that contract with ESPs could help ensure that virtual classrooms do not result in enormous class sizes that negatively impact the students enrolled.

Lack Of Provisions Regarding Non-Colorado Residents

Additionally, while 14 ESP contracted online schools (88%) indicated that their school had a provision in place regarding whether students who are not Colorado residents could enroll in the same course sections as in-district students, a review of the specific language provided by the reporting schools illustrated that loopholes may exist. Nine of the schools (64%) indicated that course sections would be exclusively available to students from their MDOL, but did not specify that the same teacher couldn't be assigned to teach sections with students out of the MDOL. In the provisions from the remaining 5 schools (36%), language primarily focused on ensuring access to Colorado residents and ensuring that non-Colorado residents were not included in enrollment counts for state funding purposes. As previously noted, the absence of specific provisions does not necessarily indicate concerns with current practices; however, additional transparency and data could provide greater insight into how students are being served across Colorado.

Data Takeaway

Very little information regarding class size was provided by ESP contracted online schools and none of the schools reported that their contracts had provisions to limit class size or student-teacher ratios.

3C ESP OVERSIGHT RECOMMENDATION

Require Local Education Agencies authorizing online schools to include specific financial provisions when establishing their contracts with Educational Service Providers.

Information gathered through the RFI process demonstrated that Local Education Agencies that contract with Education Service Providers (ESPs) typically are not privy to the full scope of financial details of their ESP. The state should establish consistent financial provisions that Authorizers must include in contracts with ESPs. Provisions should include Authorizer access to detailed reporting on direct educational services as well as non-educational components. The addition of these provisions could help to reduce non-educational costs of doing business with ESPs across the state.

Limited Access To Financial Information

Similar to educational specific details, LEAs that contract with ESPs appear to receive, or have access to, limited financial details with regards to how payments to ESPs are utilized and distributed. Thirteen of the 16 schools that contract with ESPs (81%) indicated that their LEA receives an accounting or financial reconciliation from their ESP showing how payments from the district were expended. Details on these provisions demonstrated that in most cases ESP are required to provide the district with information needed to meet statutory financial reporting obligations, but also indicated that schools may not receive a full accounting. Only five schools (31%) reported that their contract with their ESP identifies the amount or percentage of funding retained by the ESP for profit, administrative cost, or overhead. Utilizing the information provided by the 5 ESP contracted schools the average percentage retained for profit, administrative costs, and overhead by ESPs for these 5 schools was 16% with a median of 15%. Table 5 shows the breakdown of total payments and amount retained for profit, administrative costs, and overhead based on information provided through the RFI process.

Table 5. Breakdown Of Total Payments And Amount Retained*

School	Total Payment To ESP	Total Amount Retained By ESP For Profit, Administrative Costs, And Overhead	Percentage Of Total
School 1	$10,071,730	$1,499,295	14.8%
School 2	$9,642,683	$1,442,320	14.9%
School 3	$6,764,077	$1,005,280	14.8%
School 4	$6,204,936	$1,219,744	19.6%
School 5	$4,735,904	$690,272	14.5%

*Note: Only 5 of 16 ESP contracted schools surveyed provided detailed budget information regarding amounts retained by the ESP. As a result the table only reflects responses from those LEAs and may not be representative of amounts retained by all entities surveyed.

Data Takeaway

Based on information provided by 5 ESP contracted online schools that reported on the amount retained by ESPs for profit, administrative costs, and overhead the average was 16%. Information was not provided by the 11 remaining schools so figures may not be representative of amounts retained by all entities surveyed.

Numerous Areas Are Budgeted By ESPs

All sixteen ESP contracted schools reported that their ESP budgeted for professional development, technology platforms, technology support, special education services, and office supplies. Fifteen schools (94%) reported that their ESP budgeted for building operations, and fourteen schools (88%) reported co-curriculars and classroom materials as additional expenditures. Only 1 of the 16 schools indicated that their ESP budgeted for marketing and communications and 1 indicated they budgeted for curriculum and testing. For a full list see Table 3.

Greater Financial Transparency Is Needed

Additional information and transparency regarding expenditures by online schools that contract with ESPs would provide a more complete understanding of how funds are allocated. For example, while all 16 ESP-contracted online schools reported providing in-person testing to students, only one school reported expenditures for curriculum and testing. Further information will be needed to develop a clearer picture of spending and budgetary practices among ESP-contracted schools; however, more specific financial reporting requirements for online schools that contract with ESPs could help provide greater transparency.

3D ESP OVERSIGHT RECOMMENDATION

Clarifying what legal obligations apply to Local Education Agencies should also apply to Education Service Providers.

As public entities, Local Education Agencies have numerous legal requirements under state and federal law (e.g., compliance with the Colorado Open Records Act, financial transparency reporting, ensuring FAPE, providing 504 accommodations). While Education Service Providers (ESPs) are acting as a public entity providing public services for Colorado students, it is often unclear what requirements apply to ESPs as private entities.

Legal Obligations Of ESPs

LEAs must adhere to numerous state and federal laws as public entities. Requirements such as compliance with the Colorado Open Records Act[30] (CORA) ensures the public availability of records to help enhance transparency. As public entities, public schools across Colorado must provide any non-confidential information requested through the process. ESPs that contract with public schools in the state are private entities, who normally are not bound by the same legal requirements as public entities. However, since these contracted ESP are providing a public service for students across Colorado, a legal grey area exists. This raises questions about the extent to which existing legal requirements apply to ESPs providing services to public entities and whether additional requirements may be appropriate.

Data Takeaway

As private entities providing a public service, the legal obligations of Education Service Providers regarding state and federal laws, such as the Colorado Open Records Act, are unclear.

[30] CORA, https://law.justia.com/codes/colorado/2023/title-24/public/article-72/part-2/section-24-72-201/

Accountability and Expectations

4A ACCOUNTABILITY AND EXPECTATIONS RECOMMENDATION

Adjustments to the parent opt-out process could be utilized to help increase state assessment participation rates.

Colorado currently provides parents with the right to opt their children out of state testing. In survey responses and focus groups, many online leaders indicated that one cause of low participation rates was the schools' inability to ensure stronger assessment participation due to current opt out regulations. While some other states also allow parents to opt-out of state testing, many have specific limitations. Pennsylvania, Oregon, and Minnesota all allow parents to opt their student out of testing but include specific requirements or limitations to do so. While some states do allow for parent opt-out, several prohibit opt-out including Texas, Oklahoma, and Arkansas. Changes to parent opt-out laws and corresponding state board rules could help increase participation rates.

Colorado Policy Landscape on State Assessment Participation

Since 2015, Colorado has tried to balance parents' rights on excusing their students from assessments with the state and federal expectations on assessing all students' educational progress for accountability and improvement purposes.

C.R.S. § 22-7-1013(8)(a–c)[31] establishes three important requirements:

- *Parental right to excuse:* Parents may excuse their children from one or more state assessments. LEAs must adopt policies explaining how parents can exercise this option.
- *Protection from negative consequences:* Schools cannot penalize students or parents for an excusal (e.g., imposing unexcused absences, restricting attendance, excluding students from extracurricular activities or testing-related awards).
- *Local procedures:* Districts determine excusal procedures but they must have reasonable requirements that do not encourage or discourage excusals.

These protections are aimed at rights of families and are separate from how assessment participation is used within the state accountability system for schools and districts (e.g., SPF and DPF calculations, ESEA accountability). The use of state assessment participation in state accountability is addressed in Recommendation 4B.

[31] Parent excusal rights, https://law.justia.com/codes/colorado/title-22/general-and-administrative/article-7/part-10/section-22-7-1013/

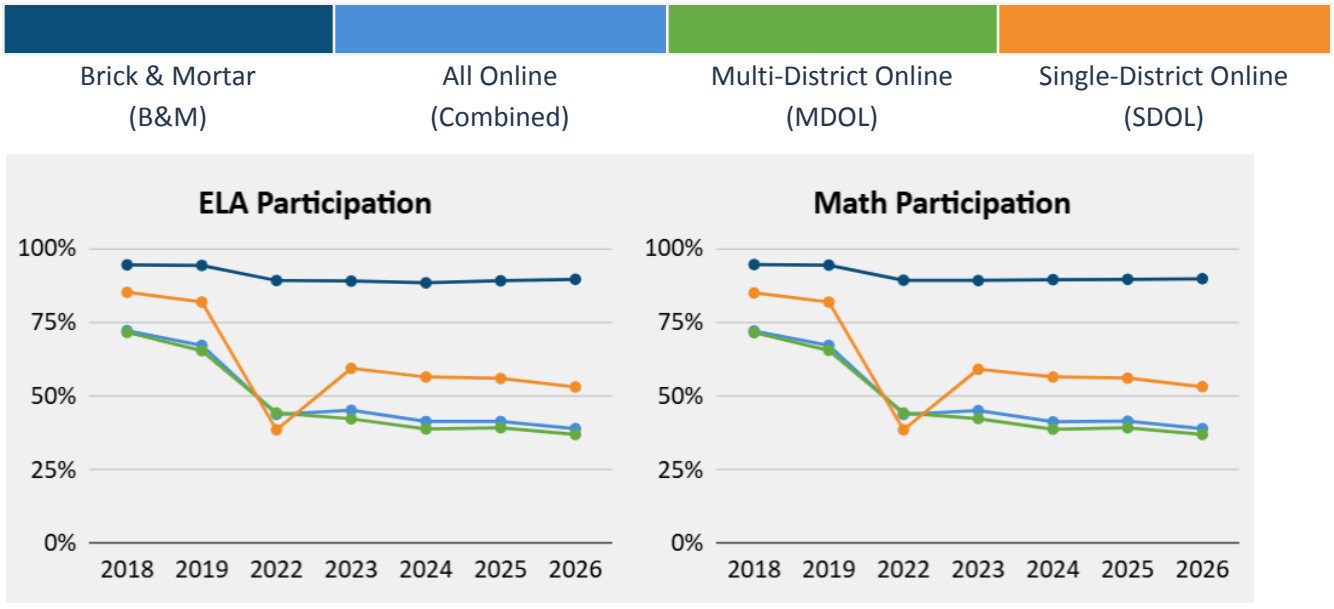
Parent Opt-Out Rates

While some parents across all educational settings excuse their students from state assessments, online families represent a disproportionately large percentage of opt-outs. In SY2017-18, online students represented approximately 9% of all parent excusals in Colorado in both ELA and math; by SY2025-26, that share had increased to approximately 29% of all parent excusals. For comparison, online students made up just 4% of the overall student enrollment in Colorado in SY2025-26. Most online parent excusals were among students enrolled in MDOLs, which accounted for approximately 26% of all statewide parent excusals in SY2025-26. Conversely, the share of statewide parent excusals attributable to students attending B&M schools declined to approximately 71% of statewide parent excusals in SY2025-26, down from approximately 91% in SY2017-18. Although B&M schools continue to account for the majority of parent excusals by number, online students are disproportionately represented relative to their share of the statewide student population.

Participation Gaps In State Assessments

In SY2025-26, approximately 90% of B&M students participated in state ELA and math assessments, compared with approximately 39% of online students. The participation gap between online and B&M schools has widened substantially since SY2017-18, when participation was approximately 94% among B&M students and 72% among online students. By SY2025-26, this gap had grown from approximately 22 percentage points to 51 percentage points (Figure 4). Participation was particularly low among MDOLs, where 37% of students participated in ELA assessments in SY2025-26, compared with 53% in SDOLs. Math results show nearly identical patterns.

Figure 4. State Assessment Participation Rates, 2018-2026



Data Takeaways

State testing participation rates are low across online educational settings, with SDOLs reporting slightly higher participation rates than MDOLs.

Addition Of Remote Proctoring

Beginning in SY2025-26, eligible full-time online schools could administer CMAS assessments remotely under C.R.S. §22-7-1006.3(1)(e)(II)[32]. Based on eligibility criteria (e.g., exclusively virtual, no high school because remote proctoring is not available for PSAT/SAT), 24 MDOL schools and 8 SDOL schools were given the option to administer CMAS ELA and math assessments remotely in SY2025-26. Of the 24 MDOLs eligible to offer remote proctoring for CMAS, 18 used it with at least one student. Their combined participation rate increased from 19.2% in SY2024-25 to 24.7% in SY2025-26, a gain of 5.5 percentage points. However, MDOLs that did not use remote proctoring had much higher participation rates in both years (65.7% in SY2024-25 and 64.6% in SY2025-26). Only two of eight eligible SDOLs used remote proctoring for CMAS. Their combined participation rate declined slightly, from 54.9% in SY2024-25 to 53.7% in SY2025-26, while SDOLs that did not use remote proctoring fell slightly from 69.3% in SY2024-25 to 67.3% in SY2025-26. As the first year of implementation, these results should be interpreted cautiously. The data demonstrate that online schools are beginning to use remote administration, particularly MDOL schools, but do not establish that remote proctoring itself increases assessment participation. Additional years of data will be needed to understand adoption and whether remote administration is associated with changes in participation over time.

Data Takeaway

Although online students only represented 4% of the overall student population in Colorado in SY2025-26, they made up 29% of the statewide parent excusals for state testing. The addition of remote proctoring has contributed to a modest increase in participation rates for online schools.

Parent Opt-Out Policies In Other States

States across the country vary widely with regards to laws and regulations concerning parent opt-out of state testing. While many states do not specifically provide parents with the right to opt their children out of state testing, some do have laws in place to guarantee that right. Pennsylvania[33] allows parents to excuse their child from specific instruction that conflicts with their religious beliefs, while Oregon[34] gives

[32] Remote proctoring, https://law.justia.com/codes/colorado/title-22/general-and-administrative/article-7/part-10/section-22-7-1006-3/

[33] Pennsylvania, https://www.law.cornell.edu/regulations/pennsylvania/22-Pa-Code-SS-4-4

[34] Oregon, https://www.oregon.gov/ode/educator-resources/assessment/Documents/Opt-Out_Form_English.pdf

parents the expressed right to opt-out of English Language Arts and Math statewide assessments as long as written notice is given 30 days prior to testing. The state of Minnesota[35] also allows parents to opt their children out of testing, however, students who do not participate are typically counted as "not proficient", and can not receive a college-ready score which can allow students to skip remedial, noncredit courses at a Minnesota State college or university. The states of Texas[36], Oklahoma[37], and Arkansas[38] all require all students to participate in state testing.

Balancing Choice And Accountability

While the right for parents across Colorado to opt-out of state testing is valued by some families, it is important that the rights of parents are balanced with an accountability system based on state assessment data. While a complete elimination of opt-out rights may not be warranted, consideration should be given to the specifics involved in a parent's ability to opt-out. Additional requirements to request opt-out or potential incentives for college-bound students, similar to those in place in Minnesota, could encourage families who have opted out in the past to reconsider for the future. Without adjustments to the system, state testing participation rates are not likely to change.

4B ACCOUNTABILITY AND EXPECTATIONS RECOMMENDATION

Adjustment to how parent opt-outs are incorporated into the District and School Performance Frameworks.

One of the significant factors used to assign plan types under Colorado's accountability system is student achievement and growth, both of which rely on state assessment scores. When schools have low participation, it is difficult to apply a state accountability system transparently and consistently for all sites. Low state assessment participation rates among online schools can limit the effectiveness of accountability measures designed to ensure that all schools meet basic performance expectations. As a result, some online schools may not be identified for the supports or interventions that would otherwise be associated with low performance. This underscores the need for greater transparency and effective oversight to support consistent accountability across all educational settings. Most states, including Texas, Florida, and Alaska, incorporate the federal 95% participation benchmark into their accountability systems, with participation rates below this level affecting school performance ratings. Consideration may be given to adjusting how parent opt-outs are calculated within the performance framework or raising the threshold at which the state board intervenes after persistent low participation.

[35] Minnesota Statewide Assessments, https://education.mn.gov/mdeprod/idcplg?IdcService=GET_FILE&dDocName=PROD098888&RevisionSelectionMethod=latestReleased&Rendition=primary

[36] Texas, https://tea.texas.gov/data-reports/staar/staar-resources

[37] Oklahoma, https://law.justia.com/codes/oklahoma/title-70/section-70-1210-508/

[38] Arkansas, https://law.justia.com/codes/arkansas/2015/title-6/subtitle-2/chapter-15/subchapter-4/section-6-15-433/

Implications of State Assessment Participation for Accountability

Accommodating statutory parental excusal provisions (discussed in Recommendation 4A) within Colorado's accountability system has required the SBE and CDE to develop increasingly complex policies and calculation methodologies to preserve the integrity and usefulness of school and district performance ratings. While these adjustments have helped the state accommodate parental excusals, they have raised questions about whether performance ratings adequately represent outcomes for all students when assessment participation is very low in some schools. Additionally, these policies may raise concerns about the transparency and perceived fairness of the accountability system, particularly for schools with higher assessment participation rates. There are three principal mechanisms that have been designed to address the balancing act between parent excusals and maintaining a fair and transparent accountability system:

- *Adjusted participation calculation (Accountability Participation).* Through a State Board motion in February 2015 to avoid penalizing sites for parent excusals, documented parent excusals are excluded from the numerator and denominator when calculating participation for accountability purposes. This includes not reducing ratings when a school does not meet the 95% participation threshold due to parent excusals.
- *Insufficient State Data (ISD) designation.* When conditions (e.g., no tested grade level such as a K-2 school, very small system) or participation is so low there is not enough data to public report and assign a rating, the state will assign an “Insufficient State Data” designation. Schools with less than 25% total assessment participation (regardless of the number of parent excusals) are assigned an ISD: Low Participation plan type. They have additional improvement planning requirements and are eligible for additional technical assistance and sometimes for grants. After three years of the identification, the school must present its plan to the state board. Online schools were exempted from this identification in FY2026-27 during initial implementation of online proctoring.
- *Low total participation note.* Performance framework reports include a total participation update on the front page for informational purposes. It does not impact the rating, and is intended to give viewers a caution on interpretation if total participation is below 95%.

Colorado has developed mechanisms to avoid penalizing schools for parental excusals, but those mechanisms ultimately result in an incomplete picture of student performance and prevent CDE from effectively evaluating school performance.

School And District Performance Frameworks

The state of Colorado currently calculates Performance Frameworks to evaluate schools on an annual basis. Performance Frameworks are based on academic achievement and growth on state assessments, along with postsecondary measures such as graduation rates, drop-out rates, and college matriculation rates. School Performance Frameworks are built from three performance indicators: academic achievement, academic growth, and postsecondary workforce readiness. Academic achievement is based on mean scale scores obtained on the annual state assessments. Academic growth is calculated

based on median student growth percentiles (MGPs) and percent on-track to proficiency. CDE currently publishes Performance Frameworks annually for Colorado public schools, including SDOL schools and MDOLs. Student performance from these schools are included within the District Performance Framework (DPF) of the authorizing district. Single-district online programs are included within the School Performance Framework (SPF) of the school that houses the program. Based on the calculations of the framework, each school is assigned a plan type that describes the type of improvement that must be written and publicly posted, including additional requirements for schools on the accountability clock.

- *Performance Plan* for schools that meet or exceed expectations.
- *Improvement Plan* for schools that demonstrate moderate performance but fall short of overall state expectations.
- *Priority Improvement and Turnaround Plans* for schools with the lowest performance. They are considered to be on the accountability clock which includes eligibility for additional support and grants, as well as additional planning requirements. If the school remains on the clock for five years, then the State Board of Education must direct action.
- *Insufficient State Data* is assigned when there is not enough data available to calculate a performance framework plan type, including schools with very small student populations, not tested grade levels or extremely low assessment participation. As described in the previous section, schools identified with ISD: Low Participation are subject to additional accountability requirements.
- Note: Alternative Education Campuses (AECs) have at least 90% students that meet the state definition of at-risk and are designated by the State Board of Education. As a result, they use a different performance framework that accounts for their specialized mission and student demographics. AEC Performance Frameworks includes indicators for academic growth, postsecondary & workforce readiness, student engagement, and academic achievement.

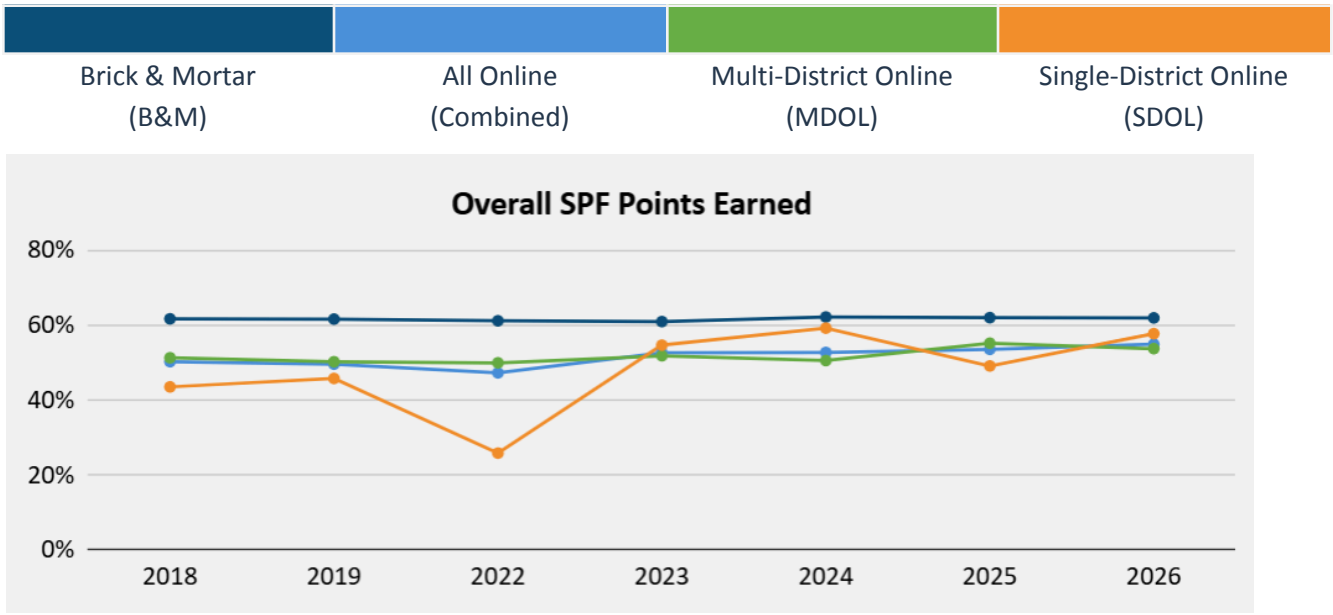
School Performance Framework Points

Analysis conducted by CDE has demonstrated that statewide, the overall percentage of SPF points earned has changed little since SY2017-18 (from 61.4% points earned overall to 61.3% in SY2025-26), disregarding the disruptions caused by the pandemic between 2020 and 2022. There are meaningful differences when data is disaggregated by educational settings. B&M schools outperform online schools overall in Performance Frameworks. Online schools have improved their overall SPF performance since SY2017-18 (from 50.1% of points to 53% in SY2025-26), but a persistent gap remains when compared to B&M schools. In SY2025-26, B&M schools earned approximately 62% of available SPF points (Figure 5).

Reader Note: SPF Point Calculations

Caution should be used when interpreting online school SPF Points given the low levels of assessment participation.

Figure 5. School Performance Framework Points Earned Overall, 2018-2026



Data Takeaways

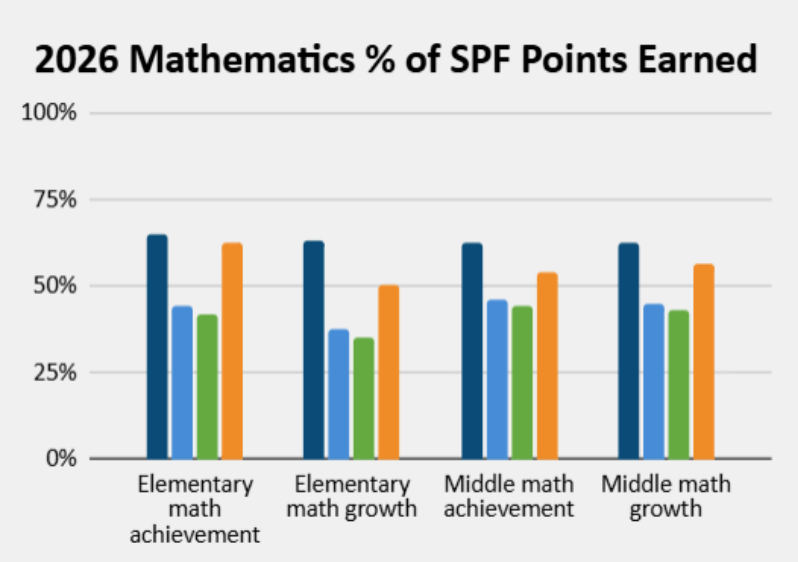
While online schools have improved their overall SPF performance since 2018, a persistent gap remains when compared to B&M.

Math Achievement And Growth

In SY2025-26, online elementary schools earned 44.1% of available Math Achievement points on their performance framework, compared with 64.9% for B&M schools (a 20.8 percentage-point gap). The difference was even larger in points earned in Math for Growth: online elementary schools earned 37.5% of available points compared with 63.2% for B&M schools, a gap of 25.7 percentage points. A similar pattern was evident at the middle school level, where online schools earned fewer available points in both Math Achievement (46.2% vs. 62.4%) and Math Growth (45.0% vs. 62.2%), gaps of approximately 16 and 17 percentage points, respectively (Figure 6).

Figure 6. School Performance Framework Points Earned By Math, 2026

Brick & Mortar (B&M) | All Online (Combined) | Multi-District Online (MDOL) | Single-District Online (SDOL)



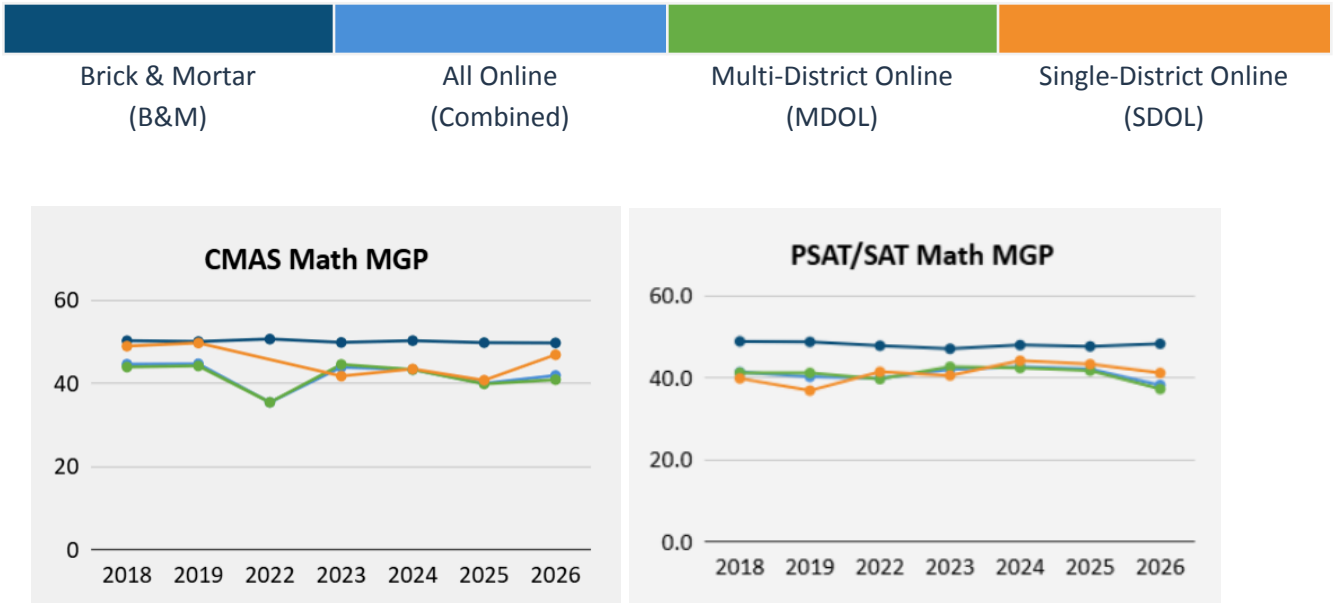
Differences in mathematics also persist across several student groups. In SY2025-26, among elementary schools receiving Math Achievement points for minority students, online schools earned 30.6% of available points compared with 57.1% for B&M schools (a gap of 26.5 percentage points). For students eligible for free or reduced-price lunch, online elementary schools earned 36.5% compared with 50.8% for B&M, a gap of 14.3 percentage points. Similar differences were evident at the middle school level. Online students generally demonstrate lower academic growth than B&M students, with the most persistent differences occurring in mathematics. In SY2025-26, the MGP for CMAS Math was 41.9 among online students compared with 49.8 among B&M students. The difference was larger at the high school level, where PSAT/SAT Math MGP was 38.3 for online students compared with 48.4 for B&M students. Math growth differences have persisted throughout the period analyzed, suggesting that this is a longer-term pattern rather than the result of a single year. Growth also varied by

Reader Note:
Colorado Growth Model

The Colorado Growth Model summarizes student's growth on state assessments between two consecutive years in comparison to their academic peers (students that earned similar achievement scores on previous assessments). Schools receive a Median Growth Percentile (MGP) by identifying the middle score, ordered lowest to highest, of all individual student growth percentiles. Growth data tends to be one of the more helpful measures when considering the impact the school has on student progress over time.

online sector. In SY2025-26, CMAS Math MGP was 49.8 in B&M schools, 41.9 online overall, 41.0 in MDOL schools, and 46.9 in SDOL schools. The corresponding scores for PSAT/SAT Math MGP were 48.4, 38.3, 37.3, and 41.2 (Figure 7).

Figure 7. Academic Growth In Math, 2018-2026



Data Takeaways

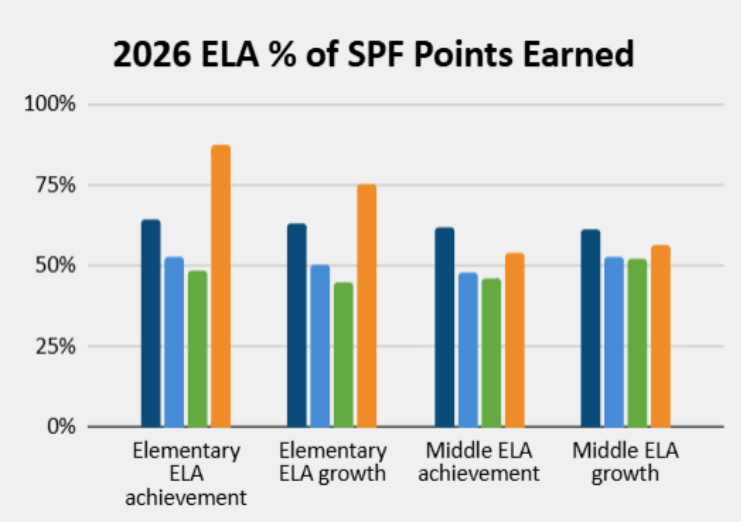
Math achievement and growth for students in online schools is consistently lower compared to students in B&M schools. This is true across school levels, particularly at the high school level when examining growth.

ELA Achievement and Growth

ELA results also show differences between online and B&M schools, but the gaps were generally smaller than in mathematics and varied across the online sector. In SY2025-26, online elementary schools earned 52.9% of available ELA Achievement points compared with 64.2% for B&M schools, while online middle schools earned 47.7% compared with 62.1%. Differences were smaller for ELA Growth, particularly at the middle school level. Outcomes also varied between MDOLs and SDOLs; for example, elementary SDOLs earned 87.5% of available ELA Achievement points compared with 48.3% for MDOLs (Figure 8). Growth outcomes for ELA, Reading and Writing illustrated similar variance across educational settings. CMAS ELA MGP was 49.6 in B&M, 43.7 in online overall, 42.1 in MDOL schools, and 51.4 in SDOL schools. PSAT/SAT Reading & Writing MGP corresponding scores were 46.9, 43.9, 42.1, and 49.2 (Figure 9).

Figure 8. School Performance Framework Points Earned By ELA, 2026

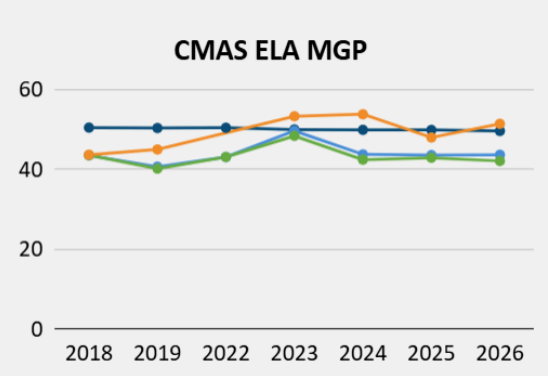
Brick & Mortar (B&M) | All Online (Combined) | Multi-District Online (MDOL) | Single-District Online (SDOL)

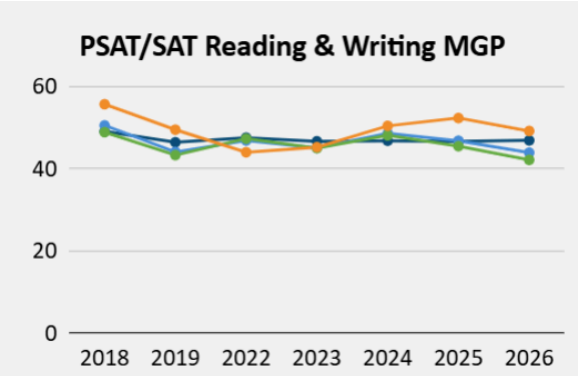


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Figure 9. Academic Growth, 2018-2026

Brick & Mortar (B&M) | All Online (Combined) | Multi-District Online (MDOL) | Single-District Online (SDOL)





Data Takeaways

While gaps in student achievement and MGP are smaller for ELA, differences persist particularly when comparing MDOLs to B&M populations. SDOLs have lower SPF points for ELA in comparison to B&M schools, but their growth in some years surpassed B&M schools.

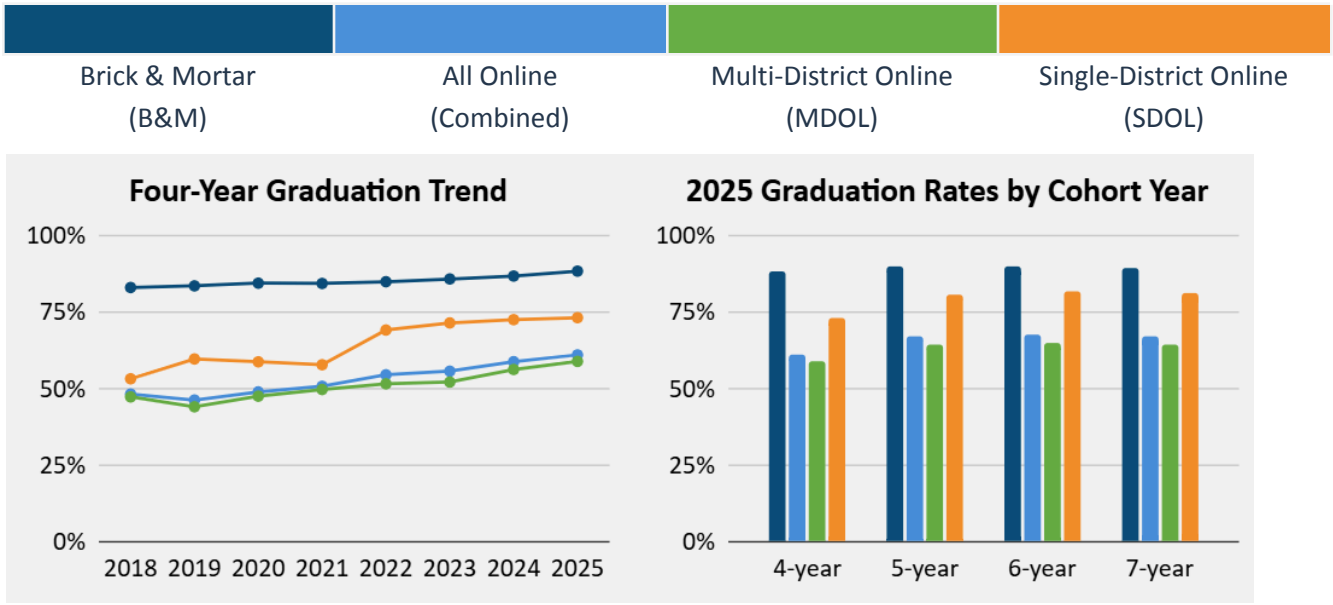
Postsecondary and Workforce Readiness Outcomes

Students pursue online and alternative pathways for many reasons, including flexibility, health circumstances, personal interests, and educational experiences that may not always be served well in traditional settings. These pathways can provide important opportunities to reengage students. Regardless of the educational setting, schools should demonstrate that students are making progress toward graduation and postsecondary readiness. Accountability should recognize differences in student circumstances without lowering expectations for preparing students for future choices.

Graduation Rates

In SY2024-25, the four-year graduation rate was 61.1% for online students compared with 88.5% for B&M students, a difference of approximately 27 percentage points. However, the online four-year graduation rate has increased substantially since SY2017-18, when it was 48.3%. Extended-year graduation rates provide additional context: the SY2024-25 online rate was 67.2% at five years and 67.7% at six years, compared with approximately 90% for B&M students (Figure 10). These results indicate that online school students earn a diploma when provided more than four years to graduate.

Figure 10. Graduation Rates By Cohort Year, 2018-2025



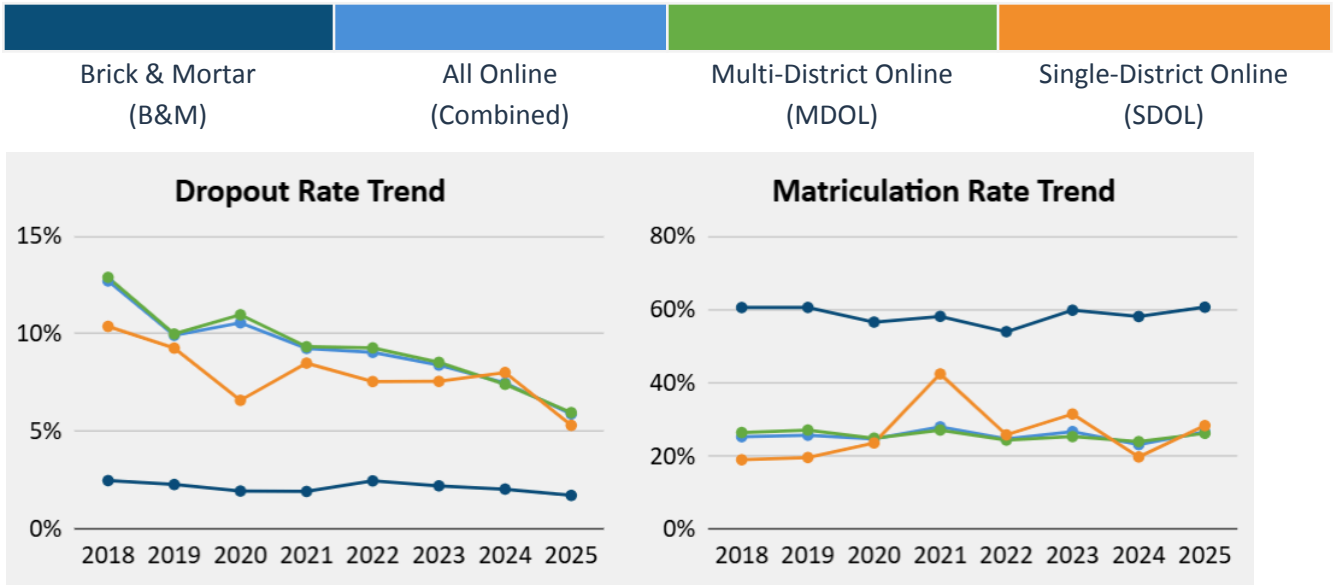
Dropout Rate

In SY2024-25, the dropout rate for online schools was 5.9%, compared with 1.7% for B&M schools. This represents substantial improvement from SY2017-18, when the online dropout rate was 12.7%. Outcomes differ by type of online school. MDOLs, which serve the majority of online students, saw dropout rates decline from 12.9% in SY2017-18 to 6.0% in SY2024-25. SDOLs had a lower dropout rate of 5.3% in SY2024-25, although still higher than the B&M rate (Figure 11). Overall, the data show meaningful improvement in online dropout rates over time, but a persistent difference between online and B&M schools.

Matriculation Rate

In SY2024-25, approximately 61% of B&M students matriculated, compared with 27% of online students, a difference of approximately 34 percentage points. In Colorado, matriculation rates track the percentage of students who enroll in post-secondary education and some workforce opportunities (e.g., industry recognized credentials, military enlistment) following graduation. This gap has remained relatively consistent over time: in SY2017-18, matriculation rates were approximately 61% for B&M students and 25% for online students. Unlike online school graduation and dropout rates, which have improved over time, online school matriculation rates have remained relatively flat. The online matriculation rate increased only modestly from 25.3% in SY2017-18 to 26.5% in SY2024-25 (Figure 11). These findings suggest that improvements in high school completion among online school students have not yet translated into comparable increases in matriculation.

Figure 11. Matriculation And Dropout Rates, 2018-2025



Data Takeaway

Over the last few years, graduation, dropout and matriculation rates have been trending in the right direction for online schools. They do not, however, perform as well as B&Ms. This is especially true for matriculation. While consideration should be given to needs and characteristics of students online schools are attracting, the state also needs to ensure foundational expectations for supporting students in their postsecondary and workforce readiness regardless of educational setting.

Online Practitioner Comments

"*School performance data is not really telling the whole story as approximately 20% of students are participating in state assessments as parents definitely utilize their right to opt out in our schools.*

"*Opt-out is used by many online, rural families. Travel is typically a hindrance to participate at an in-person testing center, online options may help boost participation. The Opt Out provided by the state is a challenge for us but each year we make a little more progress with families feeling comfortable with the testing.*"

CDE's analysis demonstrates that online schools consistently perform below their B&M counterparts on measures, such as academic achievement, growth and PWR. While online schools and programs offer families with options that cannot always be met through the B&M setting, insights into student performance in online settings is even more important to effectively identify support and policy recommendations. Low assessment participation rates, particularly when they prevent schools from earning a performance rating or limit the representativeness of available results, make it difficult to assess how well schools are serving their students. Revisiting how parent excusals are incorporated into the School Performance calculations could strengthen trust, transparency, and oversight, while helping to ensure the state accountability system provides meaningful information about student outcomes across all school settings.

4C ACCOUNTABILITY AND EXPECTATIONS RECOMMENDATION

Incentives and/or penalties could be utilized to encourage Local Education Agencies to work to increase state testing participation rates.

Simply increasing minimum statewide expectations regarding testing participation rates may not result in a significant change in participation rates for online schools across the state. However, incentives and/or penalties could be utilized in schools and districts to help increase testing rates. Florida calculates performance "grades" for schools and districts, which are calculated in part from state assessment scores that can be impacted by participation rates. If performance grades are high or improve, schools gain greater authority over the allocation of certain components of their budget. In Texas, low participation rates can lead to low performance ratings which can lead to specific state intervention and additional requirements put in place for low performing schools. Currently, Colorado lowers school ratings for low test participation that is not due to parent opt-outs. The state of Colorado could utilize other measures to encourage increased participation statewide including potential incentives such as offering technical assistance or grants or potential penalties such as revoking authorization, denying recertification, or initiation of early review could be implemented.

Efforts To Increase Participation In Other States

Numerous states across the country including Texas[39], Florida[40], and Alaska[41] currently utilize the federal benchmark of 95% state assessment participation for their schools and districts. However, these extremely high participation rates can be challenging for states to achieve. As a result some states have put in place mechanisms to attempt to encourage districts to meet participation benchmarks. In Florida, if less than 95% of students are tested, calculations are modified to count non-tested students in the denominator representing the difference between the number actually tested and the 95% minimum. These scores are utilized in a school performance system, called a School Grading System. Schools that receive the highest grade or improve at least two grades have greater authority over certain school budget allocations. By contrast, the state of Texas[42] scores all non-participating students as zeros and if state testing rates fall below 95%, calculations for Academic Achievement are completed assuming 95% participation. Low participation rates in Texas can result in low school performance ratings and potential state intervention or additional state requirements. If incentives or penalties like these were used in conjunction with adjustments to School Performance Framework calculations (Recommendation 4B) it may encourage LEAs to work to increase testing participation.

[39] Texas, https://tea.texas.gov/school-and-district-leaders/accountability/academic-accountability/a-f-accountability

[40] Florida, https://www.fldoe.org/file/18534/SchoolGradesCalcGuide26.pdf

[41] Alaska, https://education.alaska.gov/akessa/accountability

[42] Texas Participation Rates and Accountability, https://tea.texas.gov/school-and-district-leaders/accountability/academic-accountability/performance-reporting/participation-rates-and-accountability.pdf

Research Takeaway

Other states utilize incentives and/or penalties to encourage schools to work to maximize participation rates on state assessments.

4D ACCOUNTABILITY AND EXPECTATIONS RECOMMENDATION

Develop minimum statewide online education expectations for attendance and engagement.

Information shared by online schools and feedback provided during the online school focus group sessions highlighted many inconsistencies and uncertainties regarding how to meaningfully track and address student attendance and engagement in a virtual setting. While these overarching components are arguably straightforward to track in brick-and-mortar settings, the virtual and often asynchronous nature of online learning complicates the approach. Although the need to set clear expectations in an online setting is necessary, specifics will likely need to differ from the brick-and-mortar setting to help preserve the flexibility of online instruction. Attendance expectations should address consistent methods of tracking and documenting attendance in both synchronous and asynchronous settings, as well as potential protocols and policies when attendance declines. Engagement expectations should focus on standards regarding regular student-educator interactions, as well as identification and response to students who have disengaged to help ensure and track student wellness. Arizona, Kansas, Minnesota, and Mississippi all have some level of statewide standards regarding how attendance is tracked and reported. The states of Arizona and Pennsylvania have authorized legislation that aims to directly address engagement issues of online students.

Tracking Attendance

Tracking attendance in an online setting has unique challenges compared to in B&M settings. When students are attending school in a physical space, tracking attendance is more straightforward. However, when students are attending school in a virtual setting, especially when portions or all of their time is spent working asynchronously, defining attendance becomes more abstract. Colorado currently does not have a standard definition of attendance in virtual settings and as a result, online school definitions vary significantly based on their authorizers' expectations. Online schools surveyed for the RFI process were asked to provide information regarding how their school defines a day of attendance. While general themes and consistent overall measures were identified, large variation currently exists and no two LEAs appeared to track attendance in the same way.

ESP-Contracted School's Attendance Policies

ESP contracted online schools typically reported broad definitions of attendance and definitions varied from school to school. A day of attendance sometimes included an amount of time that a student needed to be logged in or a certain number of assignments or work that needed to be completed within

a given time frame. However, many definitions provided by schools were vague with regards to specific timing of various parameters such as length of time a student needed to be logged into the system/portal. One school said that they define a day of school as “6 hours of logged work, which is entered by the parent or guardian through the online portal”. Another school said that attendance was “directly tied to what the student accomplished and/or produced over a given period and the timeline established for completion of work is critical as some students may require more/less time to complete assignments.” A third school reported that “to be considered attending, all students- whether enrolled in live or self-paced courses- must log into Canvas at least four days per week throughout the semester”. Finally, one school mentioned that “students working remotely are required to work online every school day and make progress towards completion”.

District/Charter-Run School’s Attendance Policies

District/charter-run online schools generally reported more stringent attendance definitions compared to ESP contracted online schools. Most provided very specific time frames that students needed to be logged in and working and/or number of lessons/assignments that needed to be completed when specifying attendance. Additionally, many schools provide specifics around synchronous vs asynchronous components. Several schools specify that attendance is recorded by the teacher during synchronous courses typically through learning management systems (LMS). Asynchronous components are often tracked by number of hours of work completed in a week or number of assignments completed. One school reported that their “students are expected to engage in learning online for 25-30 hours per week as demonstrated through online course engagement”. Another school requires “students to log into the platform and complete 5 to 8 lessons per day”, another states that “students must log at least 4 hours per day or log at least 20 hours per week to be in attendance”. One school specifically noted that “simply logging into the portal for two minutes without clicking on course materials or completing work does not constitute legal attendance and may be marked as an unexcused absence”.

Data Takeaway

Great variability exists across online schools in defining a day of attendance.
ESP contracted schools tend to have broader and less specific definitions compared to district/charter-run online schools.

Excused Versus Unexcused Absences

There was far less variability across schools with regards to what absences were considered excused vs unexcused. Fifty-three of the 62 online schools that shared information for the RFI process indicated that they differentiate between excused and unexcused absences. Most schools listed temporary illness, injury, family emergencies, religious holidays, preapproved medical appointments, and ongoing medical issues as excused. In most cases prior notification or a doctor's note were potentially required for an

absence to be considered excused. One school specifically noted that “family vacations and other planned school leave were not considered excused”.

Chronic Absenteeism

Developing a standard method for reporting attendance is critical to help both districts and the state better track and address potential attendance issues. Chronic absenteeism, defined as a student absent 10 percent or more of the days enrolled during the school year, is a continual issue statewide. In SY2025-26, the statewide chronic absenteeism rate was 27.5%. Since the Covid pandemic, CDE has set a goal to reduce statewide chronic absenteeism by more than 50%. Based on individual definitions of attendance, 18 of the 62 surveyed online schools reported chronic absenteeism rates greater than 30%. Seven of those 18 schools reported rates greater than 50%. Online schools with high rates of chronic absenteeism were not limited to one particular type of school, suggesting that attendance is a common problem for online schools.

Tracking Attendance In Other States

Attendance tracking varies significantly from state to state and, while many states have not yet implemented state requirements, some have put in place consistent standards for schools and districts to follow. Arizona[43] required the amount of time students participate in online instruction to be tracked through daily logs. Likewise, Kansas[44] requires a system-generated daily attendance to be taken and maintained for each student. Mississippi[45] tracks attendance for students participating in virtual learning in different ways depending on whether a learning management system (LMS) is utilized or not. If a LMS is used, the LEA can develop a policy to determine required engagement in the system to qualify as in attendance. If no LMS is utilized, one-on-one contact with the students each day in addition to evidence of engagement is required.

During Covid the migration to online education across the country necessitated states and districts to develop attendance policies quickly. The Institute of Education Sciences[46] collected information from across the country regarding attendance policies put in place during the pandemic. Methods included completion of daily or weekly assignments, check-ins with teachers, participation in synchronous class discussion, posting on an LMS, log-ins to online platforms, and completion of daily attendance forms.

Research Regarding Online Engagement

While tracking attendance is important, attendance does not necessarily equate with engagement. Within the last ten years, research into online education has increased substantially and an overarching theme from much of the research conducted into online and blended learning has focused on the importance of maximizing engagement to help drive success. Dr. Jered Borup and colleagues at Brigham

[43] Arizona Attendance Tracking, https://www.azleg.gov/ars/15/00808.htm
[44] Kansas, https://www.ksde.gov/docs/default-source/csas/kansas-virtual-school-requirements-and-monitoring-plan-2025-2026.pdf
[45] https://www.law.cornell.edu/regulations/mississippi/7-Miss-Code-R-SS-3-9-2
[46] Institute of Education Sciences, https://ies.ed.gov/rel-central/2025/01/document-12

Young University developed an Academic Communities of Engagement (ACE) Framework[47] in 2020. The framework describes how students should be able to engage affectively, behaviorally, and cognitively to be successful academically. These forms of engagement must happen independently and also with support from others both within and outside of the academic course/program. Borup and colleagues identified support elements that can help to build the three types of engagement.

- Support elements for ***affective engagement*** include creating strong communication channels between individuals and developing strong relationships.
- Support elements for ***behavioral engagement*** include helping students troubleshoot problems, stay organized with regards to responsibilities, and regularly monitoring progress.
- Support elements for ***cognitive engagement*** include providing dynamic and comprehensive instruction and fostering collaboration within and across communities.

Much of the subsequent research that has taken place since the development of the ACE Framework has validated the approach and expanded the understanding of the support elements mentioned above. Research conducted by Samaranayake (2024)[48] found that students were more engaged when instructors were accessible and communicative outside the classroom. Tanis (2020)[49] also found that instructor availability and prompt feedback helped foster motivation and engagement in course. Work by Samaranayake also highlighted that parents/guardians often provide significant monitoring, motivation, instruction, and organization for their online students. Tanis (2020) as well as Keaton and Gilbert (2020)[50] identified more interactive course opportunities to support learning and student outcomes. Collaboration among peers within the classroom and with parents/guardians was also found to be essential for success (Samaranayake, 2024 and Walter et al., 2024[51]). In addition to these support elements, Walter et. al. (2024) found some more practical components that are factors in student success including access to reliable internet and teacher proficiency with technology. No aspects of academic success in the online space appear to be significantly different from aspects needed within the B&M classroom. However, unique challenges specifically in relation to the increased potential for social isolation in online education, heightens the need to consider what standards and requirements can help to foster engagement and ensure that Colorado students can be successful regardless of the educational setting that they and their families choose to utilize.

Tracking Engagement In Other States

Although tracking and measuring engagement is challenging, some states have recently put in place policies that strive to track engagement in online education. Arizona[52] tracks academic performance for

[47] ACE Framework, https://edtechbooks.org/encyclopedia/academic_communities_of_engagement_ace_framework

[48] Samaranayake https://scholar.google.com/citations?view_op=view_citation&hl=en&user=h2Kus4AAAAAJ&citation_for_view=h2Kus4AAAAAJ:W7OEmFMy1HYC

[49] Tanis, https://eric.ed.gov/?id=EJ1257615

[50] Keaton and Gilbert, https://www.semanticscholar.org/paper/Successful-Online-Learning%3A-What-Does-Learner-with-Keaton-Gilbert/d824776fc28a1fe122a4b4aba1d37430bfb0b6e5

[51] Walter et. al., https://www.researchgate.net/publication/378300791_The_Impact_of_Social_Presence_on_Online_Student_Engagement

[52] Arizona, https://www.azleg.gov/ars/15/00808.htm

all students and if achievement begins to decline, the student's parents, teachers, and principal meet and evaluate whether the student should remain in online education. Pennsylvania[53] recently passed a law requiring online programs to conduct weekly wellness checks for all fully online students. Districts are required to both visibly see and communicate in real-time with each student at least once per week. Mandated reporting, check-in documentation, and enforcement requirements are all part of the wellness law.

Online Practitioner Comments

"*Processes that can occur naturally within a B&M setting—monitoring attendance, identifying disengagement, providing immediate intervention, and maintaining academic momentum—require intentional systems and dedicated resources in a flexible online environment"*

"Attendance, engagement, and academic pacing are among the most significant challenges facing online learners, but they are also areas where targeted investment can make a measurable difference."

Effectively monitoring student attendance and engagement in online educational settings is critical to identifying students who may be disengaging from school and ensuring they receive timely support. This is particularly important as online schools may serve students who have experienced challenges in traditional educational settings, including students with greater academic, social, and emotional needs. However, inconsistent definitions and methods for documenting attendance across online schools make it difficult to reliably assess student participation, identify patterns of chronic absenteeism, and compare attendance across educational settings.

Teachers, support staff, and school administrators play an essential role in recognizing when students are struggling and can be a bridge to timely and effective support. In online environments, where daily face-to-face interactions may be limited, consistent and meaningful measures of attendance and engagement are particularly important for identifying students who may otherwise go unnoticed. Establishing clearer statewide expectations for defining, measuring, and monitoring attendance and engagement in online schools would strengthen transparency, support earlier interventions, and help ensure that students remain connected to their education and the supports they need.

[53] Pennsylvania, https://www.pa.gov/agencies/education/resources/policies-acts-and-laws/basic-education-circulars-becs/purdons-statutes/school-district-enrollee-wellness-checks-

Certification and Designation

5A CERTIFICATION AND DESIGNATION RECOMMENDATION

Require single-district online schools and programs to complete the same application process as multi-district online schools in order to begin operations.

Based on data provided by online schools across Colorado for the RFI process, in many cases no consistent and substantial educational or operational differences were found to exist between single-district online schools (SDOL schools) and multi-district online schools (MDOLs) other than the limitations on out of district students. Substantively, MDOLs and SDOL share more similarities than differences, and most states do not distinguish between the two through separate designations. As a result, a corresponding application process for SDOL schools and programs would be beneficial for the state to implement to help ensure more consistent and transparent practices. Further consideration could also be given to requiring SDOL schools to participate in a recurring review and recertification process if one is developed by Colorado in the future.

Current Application Requirements

The creation of an MDOL currently includes an application process that is required to certify the relationship between the MDOL and the authorizing district. The application requires that information regarding specific components are shared, such as governance and organizational structure, curriculum and instruction, staff development plans, as well as technology and data gathering processes. No formal application process is required in the creation of a single-district online school or program.

Potential Concerns Regarding Some SDOLs

Information shared by SDOL schools for the RFI process highlights a few potential areas of concern for some SDOL schools. Of the 18 SDOL schools that provided information, 17 indicated that they align with Colorado's Quality Standards for Online Schools[54] and 11 indicated that their practices align with the National Standards for Quality Online Learning[55] (NSQL). While online schools and programs in Colorado are not currently required to align with NSQL, they are statutorily required to align with Colorado's standards. While this discrepancy may be attributed to an oversight in the reporting process, it does flag potential concerns. Additionally, while 15 SDOL schools reported that 100% of their teachers were licensed in Colorado, 1 school indicated that only 51-60% were licensed in the state and 2 schools indicated that they did not have information regarding the number of Colorado licensed teachers within their SDOL. The percentage of teachers qualified "in-field" was even lower, with 12 schools reporting >90%, 2 schools reporting 31-50%, and the remaining 4 schools reported that the information was unavailable. (Qualified "in-field" is defined as a teacher who holds at least one of the following in the

[54] Colorado Standards, https://www.law.cornell.edu/regulations/colorado/1-CCR-301-71-3.0
[55] NSQL, https://nsqol.org/

subject area in which they have been assigned to teach: endorsement on a Colorado teaching license, bachelor's degree or higher, 36 semester hours, or a passing score on a State Board of Education approved content exam.)

Data Takeaway

Based on data reported from SDOL schools through the RFI process, some concerns were raised regarding quality standards, teacher qualification, and licensing practices.

Benefits Of A Required Application Process

While the information shared by SDOL schools through the RFI process does not necessarily indicate concerns about the quality of education provided to students, it does raise important questions about current practices that warrant further consideration. An application process and potentially a recurring review and recertification process (if developed within the state, see Recommendation 5B) could increase transparency and oversight of SDOL schools and programs and help ensure that all students across the state receive a quality education.

5B CERTIFICATION AND DESIGNATION RECOMMENDATION

Establish a recurring process of review and recertification for multi-district online schools.

At present, once an multi-district online school (MDOL) has been initially certified no subsequent review process occurs, and the Authorizer has broad discretion to modify their model. Given the quickly evolving nature of online learning across the state, formal review should take place on a regular basis to help ensure continued compliance and best practices are maintained. Colorado should establish annual reporting processes and recurring review processes through which MDOLs demonstrate continued compliance with state requirements and the ability to provide quality educational programming. The process could build on existing annual reporting processes. The process should include a comprehensive review on a regular cycle (e.g., every five years) with the ability to initiate earlier review if and when significant academic, operational, financial, assessment participation, or compliance concerns arise. The review should complement the ongoing responsibility of the local Authorizer and the state's existing accountability system. These types of annual reports and recurring reviews are becoming more common across the country. Arizona and Pennsylvania both require annual reporting for online schools, while Massachusetts and Pennsylvania both conduct extensive reviews of school performance and operations in their online schools on a regular three to five year cycle. Annual reporting and a reauthorization process for MDOLs was previously in Colorado state statute, however, the requirements were repealed in 2011.

Regular Review And Recertification

Consistently lower Performance Framework points, achievement and MGP scores, as well as lower graduation and matriculation rates and higher dropout rates for MDOLs versus B&M schools does not necessarily indicate a lack of accountability or issues with compliance and best practices. However, it does suggest that further oversight may be beneficial to ensure that MDOLs are ensuring student outcomes. Consistent annual reporting and regular review and recertification of MDOLs would aid the state in ensuring that MDOL students are receiving a quality education. Additionally, regular review may help to identify potential supports or adjustments to policies and practices that could positively impact student achievement and outcomes. In 2007, C.R.S. 22-30.7-110[56] put in place a process to review MDOLs on a regular cycle, however, the statute was repealed in 2011 before any official reviews of MDOLs took place. Strong consideration should be given to once again implementing state statute to make regular review and recertification a requirement.

Online Practitioner Comments

"*Fund quality and hold schools accountable for meaningful outcomes. Remote schools should be accountable, but accountability should reflect the students they serve*."

"*Accountability measures should also be differentiated to reflect the unique context of online education. This does not mean lowering expectations or standards. We should continue to hold online schools to high expectations while recognizing that success in an online environment may look different than it does in a B&M setting.*"

Annual Reports And Evaluations In Other States

Annual reports and evaluations for online schools are standard in a number of states including Arizona[57], Massachusetts[58], New Mexico[59], and Pennsylvania[60]. Each of these states has a comprehensive annual report requirement for online schools that provides information to the Department of Education and in some cases the legislature that includes, but is not limited to, a detailed report of expenditures and school financials (including current unassigned fund balances), descriptions of services provided, number and location of learning sites, numbers of students served, student achievement data broken down by demographics (growth, proficiency, graduation rates, drop out rates, end of year promotion rates), chronic absenteeism and truancy rates, college and career readiness data, teacher qualification data and accountability reporting. These annual reports help the state to ensure that these schools are meeting stated goals and compliance requirements. Pennsylvania goes a step further and ensures ongoing access to all records, instructional materials, and student and staff records to track compliance.

[56] MDOL review, https://law.justia.com/codes/colorado/title-22/school-districts/article-30-7/section-22-30-7-110/

[57] Arizona, https://www.azleg.gov/ars/15/00808.htm

[58] Massachusetts, https://www.doe.mass.edu/lawsregs/603cmr52.html?section=08

[59] New Mexico, https://www.nmlegis.gov/Sessions/26%20Regular/bills/house/HB0253.HTML

[60] Pennsylvania, https://www.pa.gov/agencies/education/programs-and-services/instruction/elementary-and-secondary-education/charter-schools/reports-data-and-resources

In addition to annual reports, some states, including Massachusetts[34] and Pennsylvania[61], also have a formal renewal process in place to help further evaluate online schools over time. In both states renewals take place every three to five years and include a comprehensive review of school performance and operations. Furthermore, in both states, renewal can be denied or revoked if certain standards are not met including failure to meet or improve student achievement requirements, failure to meet or comply with terms of certification, or failure to meet acceptable standards of fiscal management or audit requirements.

5C CERTIFICATION AND DESIGNATION RECOMMENDATION

Enhance data requirements and add a periodic eligibility audit to the annual redesignation process for online schools designated as Alternative Education Campuses.

Online schools designated as an Alternative Education Campus (AEC) are required to complete an annual redesignation, and this redesignation should be enhanced for online schools to include a periodic, comprehensive eligibility audit to verify AEC status. Site visits should also be included in the redesignation process to ensure student needs and state requirements are being met.

Alternative Education Campus Designation

Schools across the state, regardless of educational setting can apply for a designation as an AEC. AECs specialize in serving populations of at least 90% high-risk students and/or students with severe limitations. Schools apply annually for the designation and have some unique state requirements and accountability standards to help align expectations and better assess the unique population served. AEC designated online schools represent a small percentage of existing online schools across the state but they arguably serve some of the most vulnerable populations. As mentioned above, high need student populations and those categorized as high-risk often experience increased challenges with mental health struggles and risk-taking behaviors. While all AEC designated online schools reported providing in-person academic support services and wrap-around services, effectively supporting this subgroup of students in a virtual setting can present significant unique challenges. As a result, a more comprehensive review of AEC designated online schools with a required site visit would help ensure that AEC student population needs are being met.

[61] Pennsylvania, https://www.pa.gov/agencies/education/programs-and-services/instruction/elementary-and-secondary-education/charter-schools/charter-renewal-process-and-decisions

Supplemental Online Learning

6A SUPPLEMENTAL ONLINE LEARNING RECOMMENDATION

More clearly define the role of supplemental online programs in the online learning environment and create a clear bright-line between full-time online schools and programs.

The use of supplemental online courses has expanded with limited oversight. These courses are intended to supplement a student's education by providing one or more courses in addition to the brick and mortar (B&M) education program. In some cases, districts appear to use supplemental online courses to provide students with a fully online schedule without establishing a single district online (SDOL) school or program or a multi-district online (MDOL) school. This practice blurs the distinction between supplemental coursework and full-time education, which can create difficulty in student classification, reporting, and applicable oversight. Clear criteria should be developed to differentiate a student receiving online education from a B&M student taking supplemental online courses. Supplemental online learning could be defined based on a limited number of classes taken (e.g. no more than two courses per student in order to be classified as B&M). The developed criteria should also clarify when offering online coursework requires an SDOL or MDOL designation. If a defined threshold is created, it should apply to both state-designated and non-state-designated supplemental providers. This practice would mirror the practices of some other states, such as Arizona and Florida which both distinguish full-time from part-time online students both programmatically and for funding purposes.

Growth In Supplemental Online Learning

The Colorado statute C.R.S. §22-5-119[62] defines a supplemental online program as a program that offers one or more online courses to students to augment an educational program provided by a school, school district, charter school or BOCES. Supplemental online learning appears to be growing in popularity across the state. Over the last year the state-designated supplemental learning program provided by Colorado Digital Learning Services (CDLS) saw enrollment nearly double; in the fall semester of SY2025-26 total enrollment count was 3,930 and as of the fall semester of SY2026-27 enrollment had increased to 7,662.

Supplemental Online Learning As a Full-Time Option

While state statute seems to indicate that supplemental online learning is not intended to be a full-time educational setting for students, its growing popularity now calls that into question. A number of supplemental providers run programs across the state for a variety of districts, however, information for this RFI regarding supplemental learning was only available from CDLS, the state designated supplemental online provider. Based on information shared by CDLS during the fall semester of SY2025-26 approximately 353 students took more than 3 courses and of those students 163 took 6 or

[62] Supplemental Online Program, https://law.justia.com/codes/colorado/title-22/general-and-administrative/article-5/section-22-5-119/

more courses. In the spring semester of that school year, approximately 452 students took more than 3 courses and of those 191 took 6 or more courses. Although these numbers represent a relatively small percentage of the total number of online students in Colorado, they highlight the fact that at least in some instances supplemental online courses may be utilized as an alternative approach to providing students with a fully online education. As the supplemental online population increases, having students participate full time in supplemental learning could create challenges. Because student assessment data regarding academic growth and proficiency for supplemental students is not separated out from their full-time, in-person peers, it is unclear whether differences in student outcomes exist across these two populations. CDE assessment data for students across the state demonstrates that on average fully online students have lower overall outcomes in areas including math achievement, growth, and MGP, as well as ELA achievement, growth, and MGP. Full-time online students were also shown to have lower graduation and matriculation rates as well as higher drop out rates (Figures 4-9).

Data Takeaways

Data provided by CDLS appears to indicate that supplemental online learning populations across the state are growing and at least a small population of students are utilizing supplemental online learning as an alternative method of enrolling in a full-time online educational setting.

Full-time Versus Part-Time Distinction In Other States

While data from full-time online school and program students does not necessarily accurately reflect student outcomes for supplemental students that may be fully online, it does raise questions that at present cannot be answered. Additionally, it highlights the need to further clarify the distinction between a fully online education and supplemental online learning. Multiple states across the country, including Arizona and Florida, differentiate full-time and part-time online learning. In Arizona[63], full-time students are defined based on the total number of instructional hours during which they meet in a given school year, while part-time students are defined based on the total number of courses and hours of instruction they take during the school year. Florida[64] determines whether a student is part-time or full-time based on their school of record, course load, schedule, and diploma tracking. For B&M students in Florida, a maximum of 3 online courses can be taken in a single semester before the student would become a full-time online student. Creating a clear bright line in Colorado between full-time online and supplemental online learning would aid in state oversight and help to better track student outcomes across the state.

[63] Arizona, https://www.azleg.gov/ars/15/00808.htm
[64] Florida, https://www.flvs.net/how-it-works/enrollment-options

6B SUPPLEMENTAL ONLINE LEARNING RECOMMENDATION

Develop a list of approved supplemental online service providers and/or ineligible supplemental service providers.

As recommended for Education Service Providers, supplemental service providers could be evaluated by the Colorado Department of Education and either approved or barred from providing services within the state. Approved supplemental service providers would be eligible as providers to work directly with districts or for consideration as the potential future provider for state supported supplemental learning. An approved list of providers could reduce costs to both districts and the state through increased competition across the supplemental online landscape. If an approved list is created, it should apply to both state-designated and non-state-designated supplemental providers. As mentioned previously, Florida maintains a list of approved providers while Texas maintains a list of ineligible providers.

Current Lack Of Oversight

Although supplemental online data collected through the RFI process was limited to CDLS, other supplemental online providers partner with districts across the state to provide courses to district students. While the state designated supplemental learning offered by CDLS likely represents a large percentage of all supplemental online students, very little information is available for other supplemental providers. As a result a number of providers are functioning with no direct state oversight. As mentioned above (Recommendation 6A), students participating in supplemental online learning are combined with full-time, in-person students when school performance data is shared with CDE. Given that there is currently no way to disaggregate these students, there is currently no way to tell how those students are performing compared to their fully in-person counterparts.

Approval Process In Other States

As private entities full state oversight of supplemental providers may be challenging, however, the development of an approved and/or ineligible provider list (as was recommended for ESPs, Recommendation 3A) could be beneficial and a clear step forward in statewide oversight. A review and approval process for potential providers could help ensure financial and educational transparency and accountability. As mentioned previously, Florida has an active approved provider list and Texas has an ineligible provider list. In addition to providing more state oversight, an approved list could benefit school districts who are seeking to partner with a supplemental provider by helping districts identify providers that meet established quality standards and support positive student outcomes.

6C SUPPLEMENTAL ONLINE LEARNING RECOMMENDATION

Develop increased reporting requirements and oversight practices for Local Educational Agencies that partner with supplemental online providers.

At present, LEAs report limited data on the use of supplemental online learning providers regarding financial, operational, or academic information. With the apparent growth of supplemental online learning across the state, it has become important to ensure that students utilizing these educational options are receiving a quality education. Reporting requirements and oversight practices should be created for Local Educational Agencies that work with supplemental learning providers, to help ensure that CDE has the necessary information to effectively assess student outcomes.

Current Provider Expectations

Supplemental online providers are expected to adhere to current state educator standards and testing participation. All individuals who come in contact with students, including contractors and subcontractors, must be fingerprinted and have a background check. Additionally, where applicable, supplemental course content must align with state standards for state testing requirements. However given the current lack of oversight by the state these requirements are largely up to the district to oversee and enforce.

Potential Methods Of Increased Oversight

Expanded reporting requirements on supplemental online providers and expanded oversight practices could help regulate the system. Financial, operational, and academic data could help to ensure students participating in supplemental online learning are receiving a quality education. Reporting and oversight requirements could be a requisite for state designated supplemental providers to receive funding from LEAs. Additionally, LEAs that partner with non-state designated supplemental providers could be mandated to collect and share this information with CDE. At a minimum, if CDE had a mechanism of tracking student state assessment scores that correspond with supplemental courses that students take, it would help to shed light on student outcomes, growth, and proficiency. A majority of respondents from the parent/guardian survey (63%) whose child had participated in supplemental learning reported that their child had taken a course focused on math. Given that CDE data demonstrated that math scores among online learners are on average lower compared to their B&M counterparts, having additional information regarding student success in the supplemental space would be extremely beneficial for all stakeholders.

Data Takeaway

A majority of respondents from the Parent/Guardian survey indicated that their student had participated in supplemental online courses that have existing state standards and a corresponding state assessment for most grade levels, suggesting that additional reporting requirements for LEAs could provide relevant student outcome information to CDE.

Supplemental Online Oversight In Other States

Supplemental or part-time online education is available in a number of states across the country. Many states administer this type of online education either through the state or through district/charters. Alabama, Florida, and Mississippi all have state-run or state-regulated supplemental/part-time options. The Alabama Department of Education created and runs Alabama Connecting Classrooms, Educators, Students Statewide (ACCESS)[65], which provides supplemental courses free of charge to students in public as well as non-public schools across the state. Local districts are responsible for providing required resources including computers, internet access, and necessary software. Additionally, they are responsible for monitoring student progress and providing on-site classroom facilitators to assist students during regular class periods. The state of Florida provides Florida Virtual School Flex courses (FLVS Flex)[66] tuition-free for the state public school students. FLVS Flex is operated by the state accredited FLVS Full Time Public School, which operates as a statewide online public school district. The Mississippi Department of Education (MDE) does not offer full-time online public or online charter schools in the state, however they do offer supplemental online courses through the local school districts. MDE approves and oversees the courses that are offered to ensure they align with state standards and requirements. The Mississippi Online Course Approval process (MOCA)[67] requires local districts to apply for approval to ensure that the providers content, curriculum, and assessments align with standards as well as prove that teachers are certified within the state.

[65] Alabama, https://accessdl.state.al.us/

[66] Florida, https://www.flvs.net/how-it-works/enrollment-options/flex

[67] Mississippi, https://mdek12.org/secondaryeducation/oca/

STATE DESIGNATED SUPPLEMENTAL ONLINE LEARNING EMPOWERING DIGITAL LEARNING FOR ALL ACT

7A STATE DESIGNATED SUPPLEMENTAL RECOMMENDATION

Require the provider designated as the state's supplemental online learning provider, through the state designated supplemental learning program under §22-5-119, to provide the same student level data as Local Education Agencies are currently mandated to provide.

With a growing number of students enrolling in supplemental online learning, it is critical for the Colorado Department of Education (CDE) to receive data related to student outcomes for students enrolled in courses provided by the state designated supplemental provider in order to help assess program quality and student success. Access to this data will require ongoing authorization for Local Education Agencies to provide relevant data to the state designated provider and CDE in order to provide better transparency and oversight in the future.

Student Level Data Needs

Colorado Empowered Learning (CEL) is the state-supported online learning initiative, designed to help educators utilize technology in the classroom to enhance equity and access in elementary and secondary education. In SY2025-26 approximately $1.2 million was available to CEL from the state. CEL provides supplemental courses to students around the state through Colorado Digital Learning Solutions (CDLS). In SY2025-26, approximately $700,000 of CEL's state funding went to CDLS. As a state funded organization providing educational services for students across the state, CDLS, and any additional state-supported supplemental online learning providers in the future, should be required to provide the same student level data that any LEA within Colorado is mandated to provide. As mentioned above, no current data is available to effectively assess the outcomes of students that participate in supplemental learning within Colorado. A lack of data does not automatically translate into a lack of quality, however, oversight of and transparency from this state funded organization should be increased.

7B STATE DESIGNATED SUPPLEMENTAL RECOMMENDATION

Consideration could be given to the state expanding the type of entity that could administer and manage the state's designated supplemental online learning program.

At present, C.R.S. § 22-5-119 requires that the state's designated supplemental service provider can only be administered and managed by a board of cooperative education (BOCES), severely limiting the potential pool of administering entities. If the state were to expand the applicant pool to potentially include school districts, Charter School Institute, private organizations, and the Colorado Department of Education, cost savings may be realized as a result of a more competitive market. Florida's part-time online instruction (FLVS Flex) is administered and managed by a state-accredited online public school, while in Mississippi the Department of Education manages, and oversees online instruction.

Empowering Digital Learning For All Act

When the "Empowering Digital Learning for All Act"[68] was codified in statute, a Colorado BOCES was designated to lead, manage, and administer the statewide supplemental program. This was done due to their previous experience assisting school districts with supplemental online education. However, since the creation of the state designated program, the online education space has grown substantially and numerous additional entities now have extensive experience providing and managing online instruction. Limiting the administration and management of the state's designated supplemental program to a Colorado BOCES, significantly limits the potential pool of organizations. If the state expanded the current pool of organizations allowed to administer and manage the program to include school districts, Charter School Institute, private organizations, and CDE, a more competitive applicant pool would be created and potential cost savings for the state could be realized without compromising quality.

Potential For Expanded Access

In addition to potentially helping to realize cost savings for the state, expanding the applicant pool may also help to expand access to supplemental learning in communities where it is most needed. The initial drive to invest in supplemental learning came about to support school districts, charter schools, and BOCES, especially those that lack the capacity to develop their own supplemental online education course offerings. However, based on the data shared from CDLS for the RFI process, small districts that arguably may require this type of support the most, account for a very small percentage of state designated supplemental enrollment. Of the 25 smallest districts in the state, 15 utilized CDLS supplemental learning opportunities in FY2025-26. Those 15 districts accounted for 74 of the 2995 unique students (~2%). Eight districts across the state enrolled 80 or more students in CDLS in SY2025-26 and those districts represent a significant range of enrollment sizes (Table 6). Overall, 121 districts in Colorado had at least one student who participated in supplemental online learning during SY2025-26. Every district, charter, or BOCES that needs supplemental online instruction may currently have access, but a new administrative and/or management approach may help lessen costs to the state and also

[68] Empowering DIgital Learning for All Act, https://codes.findlaw.com/co/title-22-education/co-rev-st-sect-22-5-119/

expand the access and reach of supplemental learning across Colorado. As mentioned above, a number of states, including Florida and Mississippi, administer or manage all online learning (both full-time and part-time) through the state. More involvement by CDE in statewide supplemental learning could help to address some of the concerns highlighted in this report regarding supplemental online learning.

Data Takeaway

Small rural districts currently represent a very small percentage of the overall enrollment of state supported supplemental online learning provided by Colorado Digital Learning Solutions.

Table 6. Districts With The Highest Enrollment In CDLS During SY2025-26

District	Approximate District Enrollment	Number Of Students Enrolled In CDLS	Approximate Percent Of District Students Enrolled In CDLS
Archuleta County 50JT	1,500	98	6.5%
Aspen 1	1,500	135	9%
Burlington RE 6J	750	125	16.6%
Harrison 2	12,000	82	0.7%
Jefferson County R-1	74,000	83	0.1%
Lewis Palmer 38	6,000	364	6%
Rocky Ford R-2	600	88	14.6%
Weld Re 5-J	4,000	122	3%

Parent/Guardian Comments

“More opportunities for our students to learn about subjects/trades in their interests.”

“My child is a competitive athlete and online courses allow him to carry a full course load (combination of in person and online) and practice his sport daily.”

“The level of the courses gets harder based on the students' needs to a level that challenges them.”

“These supplemental online programs have allowed us to craft a curriculum that is more in line with our children's academic acumen and aspirations.”

7C STATE DESIGNATED SUPPLEMENTAL RECOMMENDATION

Additional research and consideration could be given to the state reevaluating the role of a designated statewide provider of part-time online learning, along with the corresponding funding structure that supports it.

Currently, the designated state supplemental online provider, receives a lump sum from the state for providing services and individual registration fees from districts. At the same time, school districts with students in state-supported supplemental courses can report those hours to the state when calculating per-pupil funding. As a result, the state is arguably paying for those students twice – once at the Local Education Agency level and again through the state-designated and funded supplemental online provider. Conversely, the appropriation for the state designated online supplemental provider is a flat amount regardless of how many students it serves, whereas fully online schools receive funding on a per-pupil basis. Additional supplemental learning providers partner with some districts to provide similar services without direct support from the state; however, cost information for those supplemental courses is not widely available to conduct a direct comparison to definitively verify. Consideration should be given to the state-supported supplemental online provider's role in part-time online learning and whether changes to the existing delivery model could help lead to meaningful changes in the existing funding structure.

Current Funding Model For Supplemental Online Learning

At present, the state supported supplemental online learning provider is funded both through a lump sum received from the state and registration fees received from participating districts. In SY2025-26, CEL received approximately $1.2 million from the state and CDLS received just over $700,000 of that money to provide supplemental instruction. Additionally, CDLS typically charged districts roughly $250 per student, per course in SY2025-26, resulting in approximately $2.3 million in revenue from participating districts. While districts must pay a registration fee for each student that participates in CDLS supplemental learning, they are still allowed to report those supplemental online hours when calculating per-pupil funding for the state. As a result, each and every student from the 121 CDLS participating districts had students that the state was arguably funding twice, once at the LEA level and again through the state-designated and funded supplemental online provider. At the same time, some districts work with supplemental online providers that are not state supported. No cost information for those providers was available for the RFI process so it is unclear how those costs break down and how they are ultimately passed on to participating districts. The complexities and inconsistencies of funding and costs of supplemental online learning across the state does raise questions regarding what is the most sustainable and cost effective way to fund supplemental learning in Colorado. To address this question most effectively, more detailed financial information should be gathered from all supplemental online learning providers and more research should be conducted on potential funding options.

Data Takeaway

Students enrolled in state supported supplemental online learning are currently funded twice, once at the LEA level and again through a lump sum provided by the state. However, the lump sum provided by the state is not adjusted based on the number of students that enroll, creating a unique and potentially ineffective funding model for state supported supplemental online learning.

CONCLUSIONS & TAKEAWAYS

The advent and recent expansion of online learning in Colorado has many clear advantages for the student population across the state. Access to online learning enables students to individualize their educational experience and build in flexibility allowing students to access course material that would otherwise not be available to them. The size and geographic diversity of Colorado alone makes it challenging for students from rural districts to experience opportunities outside of their small corner of the state, however, online learning often opens new opportunities for students.

While clear advantages exist for students, information gathered for the RFI processes has highlighted that oversight and regulatory requirements have not kept pace with this growing educational setting. Online learning recommendations for this RFI collectively fall into four main categories to be addressed by the state.

- **Clear Definitions**- Given the rapid expansion of online learning in the past decade, a number of areas lack clear, concise, and informative definitions. Lack of clear definitions make it difficult to enact effective laws, rules, and practices to govern the space and ensure positive student outcomes.
- **More Data**- Many data gaps exist throughout online learning, especially with regards to financial practices and student outcomes. Without detailed information from LEAs and service providers it is difficult to effectively assess whether the students of Colorado are receiving a quality education and receiving the services and support they need to succeed.
- **Increased Oversight**- The ever-evolving nature of online learning creates the possibility for significant change across the space in a very short period of time. Due in large part to the current lack of approval process or review processes, oversight and regulation of operational, administrative, and management practices is weakened. Without proper oversight, changes could occur, unchecked, that could have negative consequences for Colorado students.
- **Clarifying Roles and Responsibilities of External Providers**- The growth in the online learning space has led to the increased use of private entities, including education service providers and third party vendors. As private entities providing public education services, a clear understanding of data and oversight requirements become hazy. Without a better understanding of roles and responsibilities of external partners operating within the online learning landscape, broader efforts to strengthen online education may be less effective in improving student outcomes.

PART-TIME PROGRAMS FOR HOMESCHOOL STUDENTS

FINANCE ACT AMENDMENTS

Amendment L.042 SB26-023

Amendment L.042[69] of the School Finance Act creates new requirements for all part-time programs for homeschool students (PTHS) beginning in SY2026-27. The following is a list of changes that will take place in SY2026-27:

- State funding for PTHS is only available for homeschool students and not private school students and requires LEPs to verify that participating students are homeschooled.
- Programs are prohibited from providing funds to participating students or families for direct and indirect purchases, funding reimbursements, or subsidizations of a private activity or private purchase. (Private activities and purchases include but are not limited to supplies, items, or activities that are not generally available to full-time students)
- Programs must meet applicable state laws concerning areas such as background checks and licensing.
- PTHS must operate within the boundaries of the Local Education Provider (LEP) unless provided permission by either the local school board or the state.
- The State Board of Education (SBE) must adopt rules concerning PTHS by December 31st of 2026.

Amendment L.042 established a temporary process for programs operating outside their geographic boundaries to seek provisional approval to operate during the 2026–27 school year, while a more permanent process for authorization is developed for implementation in the 2027–28 school year. Passage of Amendment L.042 will likely have a significant effect on the PTHS landscape both in the 2026-27 school year and beyond, although the exact effect it will have over the next few years is likely very dependent on how the permanent authorization process is designed. In the initial implementation of the new legislation in summer 2026, CDE received 54 applications for PTHS programs requesting the ability to serve students in locations outside of their authorizing LEP's geographic boundaries. Of those 54 applications, CDE approved 14. At the time of publication it was not yet known how many PTHS programs were authorized locally within the boundaries of their authorizing LEP or that received permission from local boards to operate within their boundaries, nor was it known what the total enrollment in PTHS programs was for the 2026-27 school year, as October Count data was still pending validation.

Beyond just the 2026-27 school year, there are a number of ways that the amendment could impact enrollment in PTHS programs long-term:

- Previous PTHS enrollment growth may have been influenced by the recent inclusion of private school students within active programs. Amendment L.042 could result in a decrease in PTHS enrollment as private school students are removed from active programs.

[69] Amendment L.042, https://leg.colorado.gov/bill_amendments/20270/download

- The prohibition of providing funds for direct and indirect purchases, funding reimbursements, or subsidizations of a private activity or private purchase could result in some PTHS programs no longer qualifying for state funding. Further, some homeschool families, who have participated in specific programming in the past, may decide not to participate in the different allowable types of programming in the future.
- New regulations regarding the operation of PTHS outside of LEP boundaries could result in some programs discontinuing various components of their program, ultimately reducing enrollment.

Amendment L.033 SB26-023

Amendment L.033[70] clarifies the legislative intent of the authority of BOCES as well as the contracted services statute (C.R.S. 22-32-122[71]). The amendment states that BOCES are not statewide authorizers of schools or programs with two exceptions 1) as permitted by the certification and authorization process covered in L.042, and 2) as prescribed through the process to authorize MDOLs. The amendment also clarifies it was never the Colorado General Assembly's intent for contracted services to create an additional and unregulated process for opening a "contract school". The amendment clarified that LEPs must use other existing statutes (e.g. Charter Schools Act[72], Innovation Schools Act[73]) when opening new schools to help ensure transparency and accountability in the educational landscape. Passage of Amendment L.033 will likely lead to some immediate impacts to the PTHS landscape including the following:

- The clarification that a BOCES is not a statewide authorizer for PTHS could result in some active programs being discontinued across the state, resulting in the decrease in statewide enrollment in PTHS.
- The requirements for LEPs to utilize existing statutes (e.g. Charter Schools Act) when opening new schools may result in a decrease in the number of active programs and an ultimate reduction in statewide enrollment in PTHS.

[70] Amendment L.033, https://leg.colorado.gov/bill_amendments/20271/download

[71] C.R.S. 22-32-122, https://law.justia.com/codes/colorado/title-22/school-districts/article-32/section-22-32-122/

[72] Charter School Act, https://law.justia.com/codes/colorado/title-22/school-districts/article-30-5/part-1/section-22-30-5-104/

[73] Innovation School Act, https://www.cde.state.co.us/choice/innovationschoolsfactsheet

BACKGROUND

The Evolution of Part-time Programs for Homeschool Students

PTHS are programs or courses offered by Local Education Providers (LEPs) to homeschool students across the state. LEPs can be school districts, charter schools, or BOCES. These programs are offered on a part-time basis and initially began as an opportunity for homeschool students to participate in academic core classes (e.g. Calculus or Physics Lab) at a local B&M. Over time, some districts designed multi-course programs on their campus that enabled homeschool students to attend courses specifically designed for homeschool students during the school week. These courses were colloquially referred to as "enrichment" courses[74] and included classes such as art, music, and physical education. As these programs grew in popularity some LEPs began to contract private entities or individuals to run these programs. These new arrangements were developed through the use of the "contracted services" statute (C.R.S. 22-32-122) which allows for services normally provided by the public school to be contracted out, however the educational service must be "of comparable quality and meet the same requirements and standards that would apply if performed by the school district."

PTHS Program Types

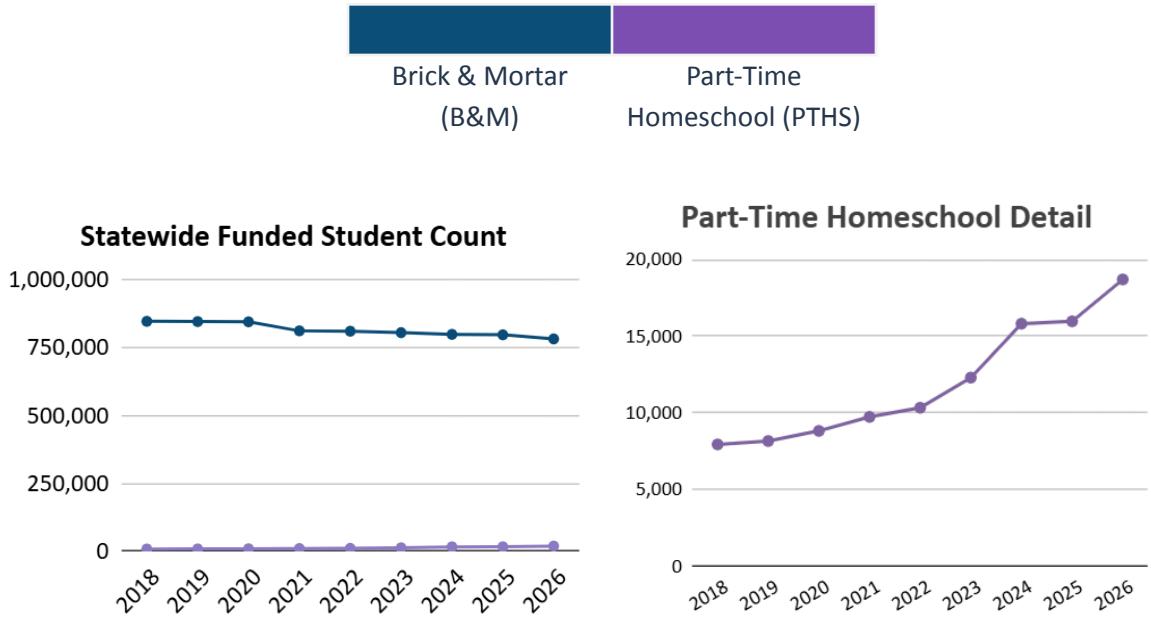
A total of 69 LEPs (school districts, BOCES, and/or charters) provided information to CDE regarding their work with homeschool students pursuant with H.B. 26-1428. Thirty-four of the LEPs reported that they only provide opportunities for homeschooled students to participate in existing in-person courses that are provided to their full-time students as part of the regular course offerings (also known as "opt-in" courses). The remaining 35 LEPs provide dedicated courses that were specifically designed for or exclusively available to PTHS students (also known as "dedicated PTHS" programs). While most LEPs reported offering one type of programming – either "opt-in" or " dedicated PTHS" programs – 5 LEPs (14%) did offer both "opt-in" and "dedicated" courses to PTHS students.

PTHS Enrollment

CDE data illustrates that among students funded as part-time, PTHS enrollment trends have been moving in the opposite direction of B&M participation. Since SY2019-20, part-time B&M enrollment declined from approximately 4,600 to 2,700 students, while PTHS enrollment more than doubled from 7,930 to 18,695 students between SY2017-18 and SY2025-26 (an increase of approximately 136%) (Figure 12). While PTHS enrollment has increased substantially since SY2017-18, student mobility between B&M schools and PTHS has shown a different pattern. As of the SY2025-26 October Count, 1,455 students moved from B&M schools to PTHS, while 1,646 moved from PTHS to B&M schools. These transitions were concentrated among younger students. Nearly two-thirds (61.9%) of students moving into PTHS were in elementary school, while students returning from PTHS to B&M schools were primarily a combination of elementary (39.1%) and middle school (35.4%).

[74] It is important to note that "enrichment" or "enrichment courses" was a commonly used term to describe part-time homeschool courses, but was not formally defined or recognized in statute.

Figure 12. Funded Student Count By Educational Setting, 2018-2026



Based on parent/guardian survey responses, 59% of the 470 homeschool respondents indicated that their child had participated in at least one other educational setting in the past and those students were most likely to have participated in B&M schools (85%). Homeschool respondents typically indicated that they had moved their child to a homeschool program because they didn't feel they were getting what they needed in their previous educational setting and/or they were experiencing discomfort stemming from not feeling safe or not agreeing with the educational approach or curriculum being utilized. Thirty-two percent of homeschool respondents indicated that they were considering moving their child out of the homeschool program with the most common primary consideration being a move to a B&M school (61%).

Data Takeaway

While PTHS enrollment has increased overall since SY2017-18, during SY2025-26 more students have moved from PTHS to B&M than moved from B&M to PTHS over the same time period.

Opt-In Versus Dedicated PTHS

As mentioned above, not all LEPs who shared information for the RFI process have a "dedicated" PTHS, and some only provide "opt-in" opportunities for homeschool students to enroll in courses with full-time, in-person students. Collectively, the 34 LEPs that provided information for the RFI process and indicated that only offer "opt-in" courses, served 284 homeschool students. Conversely, the 35 LEPs that

provided information and indicated that they had a “dedicated” PTHS program, collectively served 6,413 homeschool students. One hundred eighty-six of those dedicated PTHS students also participated in opt-in courses within the LEP.

Data Takeaway

The majority of homeschool students participating in PTHS are enrolled in dedicated programs as opposed to participating in opt-in courses.

Across the 35 LEPs that reported on a “dedicated” PTHS, a majority are available to elementary and/or middle school aged students (Table 7). Roughly half of these LEPs (51%) indicated that the vast majority of their students (>90%) participated in more than one class and 21 (60%) reported that >80% of their students participated in more than 90 hours of instructional time when enrolled.

Table 7. Dedicated PTHS Availability By Age Band

Student Age Bands	Number (%) Of Dedicated PTHS Available By Age Band
Elementary School Students	31 (89%)
Middle School Students	26 (74%)
High School Students	11 (31%)
Post-secondary Students	5 (14%)

PTHS Demographics

Based on data available through CDE, PTHS students have a substantially different demographic profile from students enrolled in either B&M or online schools. In SY2025-26, PTHS had substantially lower reported rates of minority status (24.1%), FRL eligibility (18.7%), multilingual learner status (0.6%), and IEP identification (0.4%). Table 8 illustrates the differences seen across the three educational settings. These differences should be interpreted with consideration of limitations in eligibility, identification, or reporting requirements for particular sectors of students. Similar trends were seen in the parent/guardian survey.

Table 8. Breakdown Of CDE Reported Student Subgroups Percentages By Educational Setting

CDE SY2025-26 Student Subgroup	B&M	Online	PTHS
Minority students	51.3%	52.5%	24.1%
Students with disabilities	13.6%	13.6%	0.4%
Free/reduced-price lunch eligible	45.1%	54.5%	18.7%
Multilingual learners	15.0%	7.5%	0.6%

FINDINGS AND RECOMMENDATIONS

8A PTHS RECOMMENDATION

Conduct a review and in-depth enrollment analysis of part-time programs for homeschool students in response to significant changes in the program landscape as a result of recent legislative change and expected state board rulemaking.

Passage of amendments L.042 and L.033 of the School Finance Act in May of this year likely had a significant impact on part-time homeschool programs, and changed the landscape of those programs across the state. Additionally, current work by the State Board of Education to fulfill a legislatively mandated rule making process regarding part-time programs for homeschool students will likely result in changes to enrollment of homeschool students in these programs. While some recommendations regarding part-time programs for homeschool students have been developed for this report, further review and analysis should be conducted once all laws and rules take effect to more accurately assess a starting point before moving forward. Having a clear picture of how changes have already impacted the space will help better align potential additional changes.

New Legislation And Expected Rule Changes

As a result of the incorporation of amendments L.042 and L.033 into the School Finance Act S.B.26-023 which was passed in May of this year, numerous changes have already taken place in the PTHS space. Additionally, S.B. 26-023 called for the State Board of Education to undertake the rulemaking process to establish additional rules to address questions and concerns regarding PTHS. Given the large amount of volatility that currently exists within the space it is unclear exactly what impact the amendments have already had on the space and what new board rules may have in the future. Based on information collected for the RFI process a number of recommendations regarding PTHS have been developed that could be implemented in combination with each other or separately. However, regardless if any, all, or some of the PTHS recommendations move forward, further review and analysis should be conducted over the coming year to develop a better understanding of how changes are influencing the space. Further information may help to differentiate the need and potential effectiveness of recommendations proposed here as well as shed light on other potentially new recommendations that may better address existing questions and concerns.

8B PTHS RECOMMENDATION

Consideration could be given to providing funding to Local Education Providers for "opt-in" homeschool students through a tiered or pro-rated scale based on the number of hours the student spends in the classroom.

At present, districts that allow homeschooled students to "opt-in" to existing academic core classes can count those students towards their state funded enrollment count and receive half the rate of pupil funding as long as the student participates in at least 90 hours of class time in the fall semester (¼ of the overall course time needed for full pupil funding). Data gathered for this RFI from opt-in schools found that a majority of opt-in students participate in at least the minimum 90 hours or class time required for part-time funding. Research conducted for this RFI found that many states that allow this type of opt-in participation by homeschool students, provide pro-rated funding to the district based on the number of hours in class. Minnesota, New Mexico, and Utah all were found to provide pro-rated funding typically based on the time homeschool students spent in class.

Instructional Time For Opt-In Students

Of the 34 LEPs that only allow homeschool students to enroll on an "opt-in" basis, approximately half (16 LEPs, 47%) indicated that the majority of their students participate in more than 90 hours of instructional time. Roughly a quarter of the LEPs (8 LEPs, 23.5%) reported that the majority of their students participate in only 90 hours of instructional time, and one entity reported all of their students participated in less than 90 hours of instructional time. Nine LEPs did not provide information regarding the number of instructional hours that homeschool students typically spend in the classroom. Given the variability in instructional time that exists across the state's population of "opt-in" homeschool students, it highlights the likelihood that many are being funded at a rate that is not proportional to instructional hours. "Opt-in" only students represent a relatively small fraction of homeschool students participating in courses and programs supported by the state, however, information collected for the RFI does suggest that those students are being funded at disproportionately high amounts. If funding for "opt-in" students continues, a tiered or pro-rated scale may help ensure that funding is provided at more proportional rates. Only 4 of the 34 LEPs that provide "opt-in" opportunities for homeschool students serve 10 or more students, as a result, tiered or pro-rated funding should not have a significant negative impact on the LEPs funding.

Data Takeaway

Roughly half of LEPs that only allow opt-in courses for homeschool students reported that the majority of students participate in more than 90 hours of instructional time, while roughly one-quarter reported that the majority participate in only the minimum required 90 hours.

Opt-In Funding In Other States

A number of states provide pro-rated funding to districts for homeschool students who opt into courses within the district. Minnesota[75], New Mexico[76], and Utah[77] all have mechanisms in state statute that provide a means for districts to receive partial funding for homeschool students. Minnesota utilizes shared time aid, while New Mexico uses a calculated cost differential based on the number of homeschooled students enrolled, and Utah uses dual enrollment laws. Consideration of these or other types of pro-rated funding models could help to ensure that funding is more proportional across the state.

8C PTHS RECOMMENDATION

Consideration could be given to limiting course offerings of dedicated part-time programs for homeschool students to only those courses already available through the school running the program and available free of charge to all full-time students.

Currently, many "dedicated" part-time programs for homeschool students provide offerings that are unique from those offered to full-time in-person students. Numerous offerings cover course content that does not directly align with existing state standards or have corresponding state assessments. Additionally, information gathered from schools with a "dedicated" program demonstrated that in many cases these program offerings are not available to full-time in-person students. This raises a question regarding effective state oversight, the ability to assess course quality, and equitable access of course offerings for full-time B&M students. If part-time programs for homeschool students were limited to only offering courses already available through the school running the program, oversight and equitable access issues would be eliminated.

PTHS State Requirement Expectations

Due largely to the evolution of PTHS and the nature of many of the PTHS programs that exist within the space, oversight has arguably not kept pace with innovation. At present, PTHS are expected to follow state guidelines regarding educator fingerprinting, background checks, and licensing. However, due to the high proportion of contracted and in some cases subcontracted staff operating these programs, oversight is almost entirely handled at the LEP level. Additionally, given the content areas covered in a number of courses offered across the state, clear standards and achievement metrics are not readily available. Combined, these structural and operational components of PTHS make effective oversight difficult.

[75] Minnesota, https://www.revisor.mn.gov/statutes/cite/126c.19
[76] New Mexico, https://law.justia.com/codes/new-mexico/chapter-22/article-8/section-22-8-23-8/
[77] Utah, https://le.utah.gov/xcode/Title53G/Chapter6/53G-6-S702.html

PTHS Educator Guidelines

Although LEPs that operate PTHS programs are required to annually assure to CDE that they are following state guidelines regarding educators, information provided by LEPs with "dedicated" PTHS programs highlights potential gaps with implementation and compliance. Ten (29%) of the 35 LEPs that have a dedicated PTHS reported that >90% of their teachers were licensed while 11 (31%) indicated that <50% of their teachers were licensed. While a majority of LEPs with "dedicated" PTHS reported that their educators were fingerprinted and background checks had been completed, 40% of LEPs either did not do fingerprinting for their PTHS educators or did not have that information available and 37% of LEPs did not complete or did not have information available on whether background checks had been conducted (Table 9). This information calls into question whether all PTHS across the state are adhering to state guidelines.

Table 9. Breakdown Of Fingerprinting And Background Checks By Number Of LEPs With "Dedicated" PTHS

Method Conducted	Fingerprinting	Background Checks
All done within the LEP	19 (54%)	20 (57%)
Some done by LEP/some done by service provider	2 (6%)	2 (6%)
Not done	11 (31%)	9 (26%)
Don't know	3 (9%)	4 (11%)

PTHS State Testing And Content Alignment

Based on the range of courses reported to be offered by PTHS, corresponding state assessments are not always available. Across the 35 "dedicated" PTHS programs, the six most commonly identified course types by number of schools that offer them were science (23, 66%), music (18, 51%), visual arts (18, 51%), social studies (17, 49%), reading, writing, & communication (16, 46%), and drama & theater (15, 43%). Twelve LEPs (34%) reported that >90% of their courses align with current state standards and 5 LEPs (14%) reported that >90% of their courses cover content that is covered on state assessments. This low level of alignment that results from varied content areas, creates challenges for the state when attempting to assess student achievement and growth.

PTHS Availability For Full-Time Students

Roughly half of LEPs (16, 46%) with "dedicated" PTHS indicated that these programs and courses were not available to their full-time students. Limited access for full-time students could be in part the result of where the PTHS is physically offered. Ten LEPs reported that >90% of their courses were only offered off school grounds and 3 schools (9%) indicated that >90% of their courses were held in a combination of on and off school grounds. Twenty-nine percent of parent/guardian survey respondents who had

children that had participated in PTHS indicated that programming had taken place in a private business, while 22% reported programming took place in a personal residence or community building/grounds. Combined this information highlights some potential concerns regarding oversight and equitable access of PTHS.

Data Takeaways

Data reported by LEPs with "dedicated" PTHS suggests that multiple programs may not comply with requirements regarding educator guidelines and many PTHS offerings are not available to full-time students within the LEP.

Addressing Access And Oversight Concerns

A majority (74%) of respondents from the 420 parent/guardian survey respondents indicated that their child participated in PTHS to enhance their education and a majority (60%) also reported that their child had participated in programming focused on core classes including English, science, math, and history. Additionally, 53% indicated that their child participated in arts programming such as music, art, theater, dance, and visual arts. If potential oversight concerns exist but a majority of families utilize PTHS to augment their child's education, lawmakers could consider limiting course offerings available to homeschool students to those already available to full-time students within the LEP such as math, history, art, and music. By limiting course offerings better oversight could take place and assessment of student outcomes would be more readily available.

Parent/Guardian Comments

"More advanced open learning incorporating arts, comprehension, biology, natural environment, outdoor exploration, movement and imagination for k-3."

"Group experiences (musical theater, parachute in P.E., choir) that can't be had at home. Also, getting a taste of what public school would be like if we were to ever reconsider our choices."

"They are able to participate in Band, have access to Art classes that would not be available in the home setting, have a consistent friend group that they are able to gather with for these classes, Science experiments that are done in a group setting."

"Chances to be taught by adults other than their parents. Increasing social interactions for my kids with peers. The possibility of being involved in things that cannot be replicated at home (plays, choir, labs, sports)."

Opt-In Access In Other States

Homeschool students' access to academic classes and extracurricular activities is limited in many states. Few states guarantee the right of homeschooled children to participate in both academic classes and extracurricular activities. Pennsylvania[78] and Utah[79] were both found to guarantee these rights through state statute, however, Pennsylvania was found to provide districts with the ability to set limitations on homeschool academic enrollment based on available classroom space and district policies. Many states provide some level of district discretion with regards to whether homeschool students can enroll in both academic courses and extracurricular activities through their public school. No states were found to have publicly funded programs run exclusively for homeschool students.

8D PTHS RECOMMENDATION
Consideration could be given to a funding stream that would be allocated to dedicated part-time programs for homeschool students, which would be separate from current public school funding.
Many survey respondents report that dedicated part-time programs for homeschool students currently provide innovative and impactful educational opportunities for homeschooled students. However, information gathered from schools that provide these programs as well as parents of students that have participated in these programs highlighted the fact that these programs are far different than what is offered by public schools across the state. Content for many of the courses offered through these programs do not have corresponding academic standards to assess quality. Additionally, programs are often held off public school grounds and in many cases not available to traditional full-time students within the district. If funding for these programs comes from public school allocations, then current laws, rules, and policies that govern B&M schools should be applied to these programs. However, a separate state allocation for programming of this type could enable schools to design innovative programs that are not confined by current regulations. Flat rate or prorated reimbursement models could be considered to replace the standard PPR allocation. Numerous competitive grant programs or prorated financial distribution models (such as the former Career Development Incentive Program) could be utilized as a starting point for design and development.

Addressing Innovative Educational Opportunities

While shifting the focus and breadth of PTHS to only encompass standard courses available to full-time students within the LEP could help to increase oversight, it would limit the types of courses currently available to homeschool students. If policymakers feel that maintaining the breadth of available courses across the state is important for homeschool students, consideration could be given to allocating a separate stream of state funding with the expressed purpose of providing varied opportunities to

[78] Pennsylvania, https://www.pa.gov/agencies/education/resources/policies-acts-and-laws/basic-education-circulars-becs/purdons-statutes/home-education-program
[79] Utah, https://le.utah.gov/xcode/Title53G/Chapter6/53G-6-S703.html

homeschool students. By separating funding, unique state requirements could be developed to govern PTHS. If pursued, a variety of approaches could be utilized as a model or starting point for this type of program including flat rate or prorated reimbursement models (similar to the Career Development Incentive Program) or a competitive grant program.

Parent/Guardian Comments

"Allows my child significant outdoor time and provides additional studies in nature, science, language arts, and skills like cooking and hand crafts. It also gives her time to be active and social and benefit from group learning."

"They offer licensing or pre-reqs or classes that will count toward licensing. They offer instruction in things I cannot, like blacksmithing or welding."

"Social benefits, learning to work with teachers that aren't his parents."

"Social benefits of being around a more diverse group than might naturally occur with private programs."

"Allows them to be part of many communities and opportunities."

8E PTHS RECOMMENDATION

Consideration could be given to eliminating funding to Local Education Providers for part-time programs for homeschool students and instead developing a school choice funding program available to families across the state.

Several states across the country provide funding, often in the form of grants, to families for educational expenses of their choosing. Arizona, Florida, Minnesota, and Texas all have funds available for families. The specifics of the programs vary by state but many limit the use of funds, require accounting of expenditures, and prohibit families who receive funding to enroll their students in other educational settings that receive state funding. In some cases access to funding is tied to an application family income is taken into consideration when awarding funding. Although this type of funding program would eliminate current complications that exist as a result of funding Local Education Providers for part-time programs for homeschool students, this type of program would likely come with unique challenges and considerations and may impose significant administrative burden on the state.

Funding Direct To Families In Other States

While adjustments to existing PTHS could help to address some of the existing concerns within the space, an alternative option for supporting access to programming and support for homeschool students could be to develop a school choice funding program. Multiple states across the country have these types of programs including Arizona[80], Florida[81], Minnesota[82], Texas[83], Utah[84], and Wyoming[85]. While the specifics of each program are unique, in each case the state provides alternative educational funding to students within the state. Exact funding amounts, restrictions on funding, and eligibility requirements vary from state to state, however a few components were common across the states reviewed. Specific guidelines are typically in place regarding the specific use of funds. Funds can often be used for the purchase of materials and textbooks, as well as supportive resources such as tutoring (e.g. Texas' Education Freedom Accounts). Funds typically cannot be utilized as a source of income for the parents of homeschooled students and many states require financial reporting by families if funds are allocated (e.g. Arizona's Empowerment Scholarship Account). Multiple states require families to apply for funding and in those cases household income is often a factor in determining the awarding of funding (e.g. Florida's Personalized Education Program). Finally, funding streams available to families are typically set up as grants or scholarships that are separate from public school funding and restrictions are often in place to prevent a "student" from receiving funding from multiple educational funding sources simultaneously (e.g. Wyoming's Education Savings Account). Consideration of this type of funding model could address oversight concerns, while simultaneously providing a level of flexibility for students and families to participate in services and support that fit their needs. Some states with these alternative education funds open the application process to all families within the state, not simply homeschool families. If lawmakers were to consider this avenue of educational funding a more in-depth review of programs across the county could be warranted.

[80] Arizona, https://www.azed.gov/esa

[81] Florida, https://www.fldoe.org/schools/school-choice/k-12-scholarship-programs/ftc/pep-faqs.stml

[82] Minnesota, https://education.mn.gov/MDE/dse/schfin/Non/

[83] Texas, https://educationfreedom.texas.gov/

[84] Utah, https://www.utaheducationfitsall.org/

[85] Wyoming, https://edu.wyoming.gov/parents/education-savings-accounts/

CONCLUSIONS & TAKEAWAYS

Part-time programs for homeschool students vary across Colorado. However, there is limited oversight within this space, which may also limit transparency and accountability. The extent to which Colorado funds and provides latitude to LEPs to create, design and operate PTHS programs appears to be unique to Colorado, as no evidence was found that other states provide homeschool students with the types of opportunities that exist in Colorado. A number of varied approaches could be taken to help either focus on increasing oversight or enable more innovation within the space, however, policymakers will likely need to balance:

- **Increased Oversight**- Limiting course options for PTHS would enable the state to regulate the space using existing accountability and oversight mechanisms. However, a focus on increased oversight could limit innovation across programs and eliminate some currently existing offerings.
- **Increased Innovation**- Moving PTHS funding out of the current state allocation for public schools could enable these programs to continue to develop new and innovative opportunities for homeschool students to learn outside their home. However, a focus on increased innovation could also limit the state's ability to regulate and oversee the work happening within the space.

Regardless of the changes made to part-time programs for homeschool students, more time and information is needed to better understand the current environment. Both current and planned legislative and rule changes to PTHS will likely have a significant impact on many aspects of the PTHS landscape. As a result, those changes should be taken into account before any path forward is chosen and implemented.

APPENDIX

Appendix A

Online Schools Type, Enrollment, And District Breakdown

District analysis, including unique districts of residence, % in-district, and % out-of-district was only completed for MDOLs.

School Name	SDOL or MDOL	ESP Contract	AEC	Funded Enrollment Count	Unique Districts of Residence	% In District	% Out of District
27J Online Academy	SDOL	No	No	340	-	-	-
70 Online	MDOL	No	Yes	167	2	84%	16%
Academy of Las Animas Online School	MDOL	No	Yes	475	43	8%	92%
Achieve Online	MDOL	No	Yes	358	14	84%	16%
Alamosa Online	SDOL	No	No	35	-	-	-
Aspire Online Academy	MDOL	No	No	76	8	78%	22%
Astravo Online Academy Elementary School	MDOL	Yes	No	516	71	1%	99%
Astravo Online Academy High School	MDOL	Yes	No	2630	112	0%	100%
Astravo Online Academy Middle School	MDOL	Yes	No	695	81	0%	100%
Boulder Universal	MDOL	No	No	224	25	65%	35%
Branson School Online	MDOL	No	No	379	88	1%	99%
Center Virtual Academy	SDOL	No	No	15	-	-	-
Cherry Creek Elevation	SDOL	No	No	260	-	-	-

School Name	SDOL or MDOL	ESP Contract	AEC	Funded Enrollment Count	Unique Districts of Residence	% In District	% Out of District
Colorado Connections @ 27J	MDOL	Yes	No	2003	127	5%	95%
Colorado Early Colleges Online Campus	MDOL	No	No	433	59	0%	100%
Colorado Online High School	MDOL	Yes	No	730	75	0%	100%
Colorado Online Middle School	MDOL	Yes	No	322	50	0%	100%
Colorado Preparatory Academy Elementary School	MDOL	Yes	No	917	80	0%	100%
Colorado Preparatory Academy High School	MDOL	Yes	No	880	96	0%	100%
Colorado Preparatory Academy Middle School	MDOL	Yes	No	610	73	0%	100%
Colorado Summit Connections Academy	MDOL	Yes	No	1163	115	0%	100%
Colorado Virtual Academy	MDOL	Yes	No	699	83	0%	100%
Colorado Virtual Academy High School	MDOL	Yes	No	1159	93	0%	100%
Colorado Virtual Academy Middle School	MDOL	Yes	No	308	55	0%	100%

School Name	SDOL or MDOL	ESP Contract	AEC	Funded Enrollment Count	Unique Districts of Residence	% In District	% Out of District
Crowley County Virtual Education Academy	SDOL	No	No	17	-	-	-
D60 Online School	SDOL	No	No	121	-	-	-
Denver Online	MDOL	No	No	559	19	76%	24%
Destinations Career Academy of Colorado	MDOL	Yes	No	635	92	0%	100%
District 6 Online Academy	MDOL	No	No	240	8	87%	13%
eDCSD	SDOL	No	No	63	-	-	-
Five Star Online Academy	MDOL	No	No	486	11	84%	16%
GOAL Academy	MDOL	No	Yes	6985	146	4%	96%
Grand River Academy	SDOL	No	No	345	-	-	-
Holyoke Alternative School	SDOL	No	No	17	-	-	-
HOPE ONLINE LEARNING ACADEMY CO-OP	MDOL	No	Yes	1300	57	5%	95%
JeffCo Remote Learning Program	MDOL	No	No	362	7	95%	5%
Jeffco Virtual Academy	MDOL	No	Yes	334	10	92%	8%
Mapleton Online	MDOL	No	No	134	9	54%	46%
Mesa Valley Community School	SDOL	No	No	207	-	-	-

School Name	SDOL or MDOL	ESP Contract	AEC	Funded Enrollment Count	Unique Districts of Residence	% In District	% Out of District
Monte Vista On-Line Academy	MDOL	No	No	48	22	25%	75%
Paragon Learning Center	SDOL	No	Yes	457	-	-	-
Pathways Future Center	SDOL	No	Yes	354	-	-	-
Peak Virtual Academy	SDOL	No	No	302	-	-	-
Peyton Online Academy	MDOL	No	No	22	4	64%	36%
Pikes Peak Early College	MDOL	No	No	223	13	70%	30%
Pikes Peak Online School	MDOL	Yes	Yes	407	63	0%	100%
PSD Global Academy	MDOL	No	No	229	6	86%	14%
Southwest Colorado eSchool	MDOL	No	No	58	6	0%	100%
Spark Online Academy	MDOL	No	No	191	12	61%	39%
Springs Studio for Academic Excellence	MDOL	No	No	443	17	70%	30%
St. Vrain LaunchED Virtual Academy	MDOL	No	No	341	14	88%	12%
St. Vrain Virtual High School	SDOL	No	Yes	42	-	-	-
TCA College Pathways	MDOL	No	No	555	12	57%	43%
The Haven School	MDOL	No	No	227	9	82%	19%

School Name	SDOL or MDOL	ESP Contract	AEC	Funded Enrollment Count	Unique Districts of Residence	% In District	% Out of District
Village High School	MDOL	No	No	522	17	58%	42%
Village Middle School	MDOL	No	No	180	9	59%	41%
Vision Charter Academy	MDOL	No	No	456	3	57%	43%
Weld Re-3J Online Innovations	SDOL	No	No	101	-	-	-
Weld Re-8 Online Academy	SDOL	No	No	39	-	-	-
Williamsburg Academy of Colorado	MDOL	Yes	No	712	90	0%	100%
World Academy Elementary School	SDOL	No	No	9	-	-	-
World Academy High School	SDOL	No	No	45	-	-	-
World Academy Middle School	SDOL	No	No	10	-	-	-

APPENDIX B
Online Schools by District

District Name	# of Online Schools by District	School List	Type of Online
Academy 20	3	TCA College Pathways	MDOL
-	-	Village High School	MDOL
-	-	Village Middle School	MDOL
Adams 12 Five Star Schools	2	Five Star Online Academy	MDOL
-	-	Pathways Future Center	SDOL
Alamosa RE-11J	1	Alamosa Online	SDOL
Boulder Valley Re 2	1	Boulder Universal	MDOL
Branson Reorganized 82	1	Branson School Online	MDOL
Byers 32J	8	Astravo Online Academy Elementary School	MDOL
-	-	Astravo Online Academy High School	MDOL
-	-	Astravo Online Academy Middle School	MDOL
-	-	Colorado Online High School	MDOL
-	-	Colorado Online Middle School	MDOL
-	-	Colorado Virtual Academy	MDOL
-	-	Colorado Virtual Academy High School	MDOL
-	-	Colorado Virtual Academy Middle School	MDOL
Center 26 JT	1	Center Virtual Academy	SDOL
Charter School Institute	1	Colorado Early Colleges Online Campus	MDOL

District Name	# of Online Schools by District	School List	Type of Online
Cherry Creek 5	1	Cherry Creek Elevation	SDOL
Colorado Springs 11	2	Achieve Online	MDOL
-	-	Spark Online Academy	MDOL
Crowley County RE-1-J	1	Crowley County Virtual Education Academy	SDOL
Delta County 50(J)	1	Vision Charter Academy	MDOL
Denver County 1	1	Denver Online	MDOL
District 49	9	GOAL Academy	MDOL
-	-	Pikes Peak Early College	MDOL
-	-	Springs Studio for Academic Excellence	MDOL
District 49 (from Education reEnvisioned BOCES)	-	Colorado Preparatory Academy Elementary School	MDOL
-	-	Colorado Preparatory Academy High School	MDOL
-	-	Colorado Preparatory Academy Middle School	MDOL
-	-	Colorado Summit Connections Academy	MDOL
-	-	Pikes Peak Online School	MDOL
-	-	Williamsburg Academy of Colorado	MDOL
Douglas County Re 1	2	eDCSD	SDOL
-	-	HOPE ONLINE LEARNING ACADEMY CO-OP	MDOL
Eagle County RE 50	3	World Academy Elementary School	SDOL

District Name	# of Online Schools by District	School List	Type of Online
-	-	World Academy High School	SDOL
-	-	World Academy Middle School	SDOL
Greeley 6	1	District 6 Online Academy	MDOL
Harrison 2	1	Aspire Online Academy	MDOL
Holyoke Re-1J	1	Holyoke Alternative School	SDOL
Jefferson County R-1	2	JeffCo Remote Learning Program	MDOL
-	-	Jeffco Virtual Academy	MDOL
Julesburg Re-1	1	Destinations Career Academy of Colorado	MDOL
Las Animas RE-1	1	Academy of Las Animas Online School	MDOL
Mapleton 1	1	Mapleton Online	MDOL
Mesa County Valley 51	2	Grand River Academy	SDOL
-	-	Mesa Valley Community School (5828)	SDOL
Monte Vista C-8	1	Monte Vista On-Line Academy	MDOL
Montrose County RE-1J	1	Peak Virtual Academy	SDOL
Peyton 23 Jt	1	Peyton Online Academy	MDOL
Poudre R-1	1	PSD Global Academy	MDOL
Pueblo City 60	2	D60 Online School	SDOL
-	-	Paragon Learning Center	SDOL
Pueblo County 70	1	70 Online	MDOL
San Juan BOCES	1	Southwest Colorado eSchool	MDOL
School District 27J	2	27J Online Academy	SDOL
-	-	Colorado Connections @ 27J	MDOL

District Name	# of Online Schools by District	School List	Type of Online
St Vrain Valley RE1J	2	St. Vrain LaunchED Virtual Academy	MDOL
-	-	St. Vrain Virtual High School	SDOL
Weld County School District RE-3J	1	Weld Re-3J Online Innovations	SDOL
Weld Re-8 Schools	1	Weld Re-8 Online Academy	SDOL
Widefield 3	1	The Haven School	MDOL

Appendix C
Additional Data Collected During The RFI Process

Online School Focus Areas

Fifteen of the 16 (93%) ESP contracted online schools reported that the primary focus of their online model was comprehensive K-12 education. The next most common models were career/college readiness (CCR), reported by 3 (19%) schools and Career/Technical Education (CTE), also reported by 3 (19%) ESP contracted online schools. Only 1 (6%) ESP contracted school reported credit recovery as a primary focus and 1 (6%) school reported alternative education.

Twenty-five district/charter-run online schools (54%) reported that their primary focus was comprehensive K-12 education. Twenty (43%) focus on CCR, 19 (41%) focus on alternative education, 15 (33%) on credit recovery, and 11 (24%) on CTE. Sixteen district/charter-run online schools additionally mentioned other focus areas with the most common reported area being comprehensive middle and high school.

SDOLs tended to report higher percentages of credit recovery and alternative education as primary focuses (36% and 45% respectively) compared to MDOLs who reported higher percentages of comprehensive K-12 programming.

Online School Class Format & Size

All 16 ESP contracted online schools (100%) reported that all of their courses were a combination of synchronous and asynchronous instruction. All 16 ESP contracted online schools reported having live/virtual sessions, tutoring sessions, and phone calls available as opportunities for synchronous interaction. Fifteen schools (94%) also provide chat sessions and 14 (88%) provide in-person face-to-face sessions.

Overall, district/charter-run online schools are more likely to provide courses that are run asynchronously or with a combination of synchronous and asynchronous components. Twenty-three district/charter-run online schools (51%) reported having no synchronous only courses available. By contrast, only 7 schools (15%) reported having no asynchronous only courses and 11 (24%) did not have any course with a combination format.

For district/charter-run online schools with any courses taught synchronously (21 total), the most common synchronous option was live/virtual sessions (17 schools, 81%), followed by tutoring (15 schools, 71%), in-person face-to-face sessions (14 schools, 67%), chat sessions (14 schools, 67%), and phone calls (10 schools, 48%). Synchronous opportunities for courses taught in a combination format contained all the same synchronous opportunities however in-person face-to-face sessions and tutoring

were the most common types of opportunities (each 27 schools, 82%). Live/virtual sessions were reported by 26 schools (79%), chat sessions were reported by 25 schools (76%), and phone calls were reported by 22 (67%).

Of the 18 SDOLs across the state, collectively they most often reported having a majority of their courses taught asynchronously (9 schools reported 91-100% asynchronous courses, 50%). When synchronous or combination courses were offered by SDOLs, synchronous opportunities typically included in-person face-to face sessions, live/virtual sessions, and/or tutoring sessions as the most common.

MDOLs, particularly those serving students statewide, reported the highest percentage of combination courses. Nineteen schools (86%) indicated that 91-100% of their courses were taught as combination courses. Synchronous opportunities for combination courses offered by MDOLs were most often reported to include live/virtual sessions, tutoring sessions, and phone calls.

Online School Student Mobility

Most students entering Colorado public education for the first time begin in B&M schools, largely because students are entering kindergarten. Using SY2025-26 October Count data, 86,052 students entered public education in B&M schools, and nearly two-thirds (62.6%) were kindergarteners. For the same year, students entering online schools looked very different: of the 3,703 new students entering through an online school, 59.4% were high school students. Information gathered from the parent/guardian survey aligns with these findings. Of the 1,882 parent/guardian respondents that indicated they had a child in an online school, 58% of those respondents had a high school student, 31% had a middle school student, and only 11% had an elementary school student.

CDE data also highlighted the fact that online schools also gained substantially more students from B&M schools than B&M are gaining from online. As of the SY2025-26 October Count, 12,075 students who had previously attended a B&M school were enrolled in an online school, compared with 4,620 students who moved from online schools to B&M schools. This means there are nearly three students moving into online schools for every one moving back to B&M schools. These transitions were concentrated in the middle and high school grades.

Data collected through the parent/guardian survey helps shed light on these mobility trends. Across all 8,047 statewide parent/guardian respondents, 42% (3,400) indicated that their child had participated in at least one other educational setting in the past. Of those 3,400 respondents, 52% currently had a child in online school and 26% had a child in B&M schools. When looking within educational settings, 82% of students currently in online school had participated in a different educational setting compared to only 19% of B&M students. Students currently in online schools were most likely to have participated in B&M school previously (86%), while students currently in B&M school were most likely to have previously participated in private school (40%). The majority of students who participated in a different educational setting in the past are currently enrolled in district-run public schools, however students in online

schools are far more likely to have participated in other educational settings in the past. District-run public school students were most likely to have attended private school in the past while online students were most likely to have attended district-run public schools

Parents/guardians of online school students most often reported that they moved educational settings because they did not feel that their child was getting what they needed in their previous educational setting (61%). Many online parents (45%) also cited other reasons for the move including bullying, mental health issues (anxiety and depression), as well as medical issues and disabilities as common reasons for their move to online school. Many parents/guardians also indicated that their child had moved to online education during the Covid pandemic and then simply never moved back. By contrast, families of B&M students most often (37%) identified reasons other than not getting what they needed as the reason for their move. Typically reasons mentioned were the cost of the previous educational setting or a desire to find more opportunities for social interaction for their child.

Statewide, only 12% of all respondents indicated that they were considering moving their student to another educational setting in the future. Of the 945 respondents that indicated they were considering a move, 70% were currently attending B&M schools and 13% were currently attending online schools. Among all B&M respondents, 15% were considering a move while only 6% of all online respondents were considering a move. When considering a move out of their current educational setting, B&M respondents were most often considering private school (44%) or homeschool (37%). Online respondents considering a move out of their current educational setting were most often considering B&M school (61%).

Online School Assessments

Numerous local assessment types are used by ESP contracted online schools across the state. AimswebPlus, iReady, mCladd with DIBELS, NWEA MAP, STAR , and ACT WorkKeys were all identified as in use by at least one ESP contracted online school. The most common local assessment for ESP contracted online schools was iReady which was used by 8 (50%) of the reporting schools. Nine schools also indicated that they utilized course-embedded formative and summative assessments including quizzes, and tests.

District/charter-run online schools also identified a variety of local assessments, however as a group they reported a wider range of assessments compared to ESP contracted schools. The most common assessment type for district/charter-run online schools was NWEA MAP (22 schools, 48%). STAR and mClass with DIBELS were also popular choices with each type of assessment being used by 13 district/charter-run online schools (28%). Seventeen schools (37%) reported other local assessment types, with two of the most common being IXL and teacher/district created assessments.

Fourteen ESP contracted online schools (88%) indicated that local assessments were typically incorporated into courses on a daily basis. Fifty-six percent (9 schools) reported that assessments were

given at least once per course and 38% (6 schools) typically provide assessments on a weekly basis. Eleven ESP contracted schools (69%) reported other frequency of assessments with a common cadence being regular, but at the teacher's discretion.

Far more variation existed amongst district/charter-run online schools with regards to local assessment frequency. Frequency appeared to vary largely based on what assessment was being utilized. Very few schools (3 schools, 7%) reported providing daily assessments.

Online School Third-Party Vendors

All 16 ESP contracted schools partner with third-party vendors, including but not limited to, Edmentum, Renaissance, Canvas, Engageli, IXL, PowerSchool, iReady, and Pearson Education. Numerous services provided by the third-party vendors were reported including curriculum and instructional services as well as back office services, marketing, compliance guidance and related services for special education students.

Twenty-three of the 46 district/charter-run online schools (50%) reported that they utilize third party vendors for specific educational services. Third-party vendors reported by district/charter-run online schools included but were not limited to CDLS, Edgenuity, IXL Learning, Canva, Savvas Learning, TechSmart, Edmentum, Imagine Learning, Stride K-12, Renaissance, and PowerSchool. Services provided by these third-party vendors included curriculum, credit recovery, and academic platforms as well as IT support, marketing and advertising, curricular resources and enrichment activities.

Partnerships with third-party vendors were reported to be more common with MDOLs compared to SDOLs.

Online School Staffing

ESP contracted online schools reported employing an average of 63 full-time staff with a median of 54 (high- 182, low-19) and an average of 12 part-time staff with a median of 8 (high-53, low-1).

District/charter-run online schools on average reported employing 39 full-time staff (median-25) and 5 part-time staff (median-3). A high of 659 full-time staff and 30 part-time staff were reported across the district/charter-run schools and a low of no full-time and part-time staff were also reported.

PTHS Management

Twenty-two of the 35 schools (63%) with dedicated PTHS reported that their programs for homeschooled students were run exclusively by district staff while six schools (17%) reported that their programs were operated exclusively by external providers. Seven districts described their programs as neither district run or external provider run.

PTHS Attendance

Student attendance was reported to be tracked by 33 (94%) dedicated PTHS surveyed. The remaining 2 indicated that they did not have information regarding the tracking of student attendance. A closer look at how attendance was tracked across the 33 PTHS, based on information provided, found that attendance is typically tracked daily utilizing a Student Information System (SIS), such as Infinite Campus or PowerSchool.

Twelve dedicated PTHS (34%) indicated that 10% or less of their student body was chronically absent as defined by the Colorado Department of Education. Three schools (9%) reported >51% of their student body was chronically absent. These 3 schools represent a total of 592 PTHS students. Four dedicated PTHS (11%) did not have information to share regarding the rate of chronic absenteeism.

PTHS Assessments

Twelve (34%) dedicated PTHS reported having assessments in >90% of their course offerings. Eight dedicated PTHS (23%) reported not having any information regarding assessment requirements in course offerings and 9 dedicated PTHS (26%) indicated they do not require assessment in their courses.

For the 18 dedicated PTHS that require assessments in any percentage of their total course offerings, 12 (67%) provide multiple assessments during the course and 15 (83%) require information about the assessments to be available to enrolled students. Four dedicated PTHS (22%) reported having a minimum number of assessments per courses required. Both formative and summative assessments are incorporated into courses at 15 (83%) of the 18 with assessment requirements, the remaining reported only having formative or summative. Fourteen (78%) of the dedicated PTHS with assessments record grades but only 9 (50%) reported providing grades to students enrolled in courses.

PTHS Outcomes

Across the 35 dedicated PTHS, 23 (66%) reported >90% of their students successfully completing courses. Two (6%) reported between 70-90% successful completion, 3 (9%) reported no successful completions, and 7 (20%) indicated they did not have information to share on the percentage of successful course completions.

How successful completion was determined varied with the most common indicator being attendance of a minimum number of course days/times. Twenty dedicated PTHS (57%) utilize minimum days/times to calculate successful completion. Calculation for determining a minimum varied, however many calculate a percentage and have a minimum percentage required. Minimum percentages varied but almost all were between 70%-90%. Other common methods for determining successful completion included completing all required assignments (12 schools) and receiving a minimum grade for the course (10 schools). Minimum grades also varied but numerous dedicated PTHS indicated they utilized a pass/fail

system for grading. Twenty-five dedicated PTHS (71%) reported 10% or less of their students drop out and 17 dedicated PTHS (49%) reported that >90% of their students take more than one course.

Parent/Guardian Survey Demographics

Table i. Breakdown Of Parent/Survey Respondents By Primary Educational Setting

Primary Educational Setting	Total Respondents	% of Total Respondents
Traditional Public School	4510	56.0%
Online School	2144	26.6%
Charter School	801	9.9%
Homeschool	470	5.8%
Private School	122	1.5%

Table ii. Percentage Breakdown Of Race/Ethnicity By Educational Setting

Race/Ethnicity	Traditional Public	Online School	Homeschool	Supplemental Online	PTHS
White	58%	46%	43%	52%	60%
Hispanic/Latino	7%	11%	10%	10%	7%
Black/African American	2%	3%	3%	2%	0%
Asian	1%	1%	0%	0%	0%
Hispanic/Latino & White	7%	8%	6%	5%	6%
Black/African American & White	2%	2%	3%	3%	0%
Asian & White	3%	1%	1%	2%	2%
American Indian/Alaskan Native & White	0%	1%	2%	0%	2%
Additional Multi-Racial/Ethnic Combinations	7%	8%	8%	9%	5%

Choose Not to Share	13%	19%	24%	17%	18%

Table iii. Percentage Breakdown Of FRL Status By Educational Setting

Free and Reduced Lunch Status	Traditional Public	Online School	Homeschool	Supplemental Online	PTHS
Not Eligible	57%	28%	30%	41%	40%
Eligible for Free Lunch	23%	35%	29%	28%	22%
Eligible for Reduced Lunch	3%	4%	3%	4%	3%
Not Sure	13%	25%	26%	18%	25%
Choose Not to Share	4%	8%	12%	9%	10%

Table iv. Percentage Breakdown Of Grade Bands By Educational Setting

Grade Bands	Traditional Public	Online School	Homeschool	Supplemental Online	PTHS
Elementary School (*1st-4th*)	30%	10%	23%	11%	21%
Middle School (*5th-8th*)	28%	29%	36%	24%	36%
High School (*9th-12th*)	30%	55%	27%	60%	33%
PreK & K	9%	2%	7%	1%	4%
Choose Not to Share	3%	4%	7%	4%	6%

Table v. Percentage Breakdown Of Region By Educational Setting

Region	Traditional Public	Online School	Homeschool	Supplemental Online	PTHS
Metro	30%	21%	19%	20%	20%
Pikes Peak	19%	13%	10%	13%	14%
North/Northeast	12%	20%	18%	12%	16%
South/Southeast	12%	11%	11%	10%	11%
Southwest	7%	10%	9%	14%	13%
West Central	6%	6%	11%	10%	12%
Northwest	6%	4%	4%	7%	5%
Choose Not to Share	8%	16%	17%	13%	9%

Parent/Guardian Survey Perspectives

Eighty-two percent of respondents statewide indicated that they were happy with the current educational setting. Of the 6,555 respondents that indicated they were happy in their current educational setting, 52% were in B&M schools, 29% were in online schools, and 6% were in homeschool.

Although internal CDE data demonstrates that on average student outcomes (measured by assessment data, drop out rates, graduation rates, and matriculation rates) in online schools continue to lag behind B&M student outcomes, survey data demonstrates that parent/guardian satisfaction and perceived outcomes were typically higher among online families compared to B&M families. Within educational settings 77% of B&M families reported being satisfied while 89% of online families and 90% of homeschool families indicated they were satisfied.

B&M satisfaction came largely from respondents valuing supportive and knowledgeable teachers (76%) and staff/teacher and student interactions (65%), while online satisfaction came largely from the flexible approach (82%) and supportive and knowledgeable teachers (73%). Homeschool families identified flexible schedules (82%) and safe/secure environments (79%) as valued characteristics.

Statewide, survey respondents reported more positive experiences than negative experiences in their current educational setting. B&M respondents reported higher consistent attendance (69%) and success with standardized testing (43%) compared to online respondents (attendance- 50% and testing- 32%)

and homeschool respondents (attendance- 54% and testing- 37%). Online and homeschool respondents reported higher percentages of feeling comfortable and supported compared to B&M respondents (Online- 68%, Homeschool- 71%, B&M- 60%). Approximately three-quarters of B&M and online respondents from both educational settings reported that their child has done well academically (B&M-74%, online-73%). Homeschool families reported the highest percentage of success academically (80%) Across all three educational settings, more useful resources, a more flexible approach, and a larger variety of courses were identified as potential areas of improvement.

A vast majority of respondents who had a child that participated in supplemental learning (79%) indicated that they were generally happy with their child's experience. Additionally, 70% reported that they would consider another supplemental course. There were a number of components that respondents indicated that they valued about supplemental online learning. The most common was that it was easy to fit into their child's schedule (68%) followed by the ability for their child to work at their own pace (62%). Respondents also valued the ability to access the course content anywhere (54%) and that it provided more course options (48%). The ability to accumulate college credits through participation in supplemental online courses was a common additional benefit that respondents mentioned. Similar to B&M, online, and homeschool families, respondents with a child that had participated in supplemental online learning sought more flexibility in the approach, and additional resources.

Eighty-eight percent of parent/guardian survey PTHS respondents indicated that they were generally happy with their child's experience, a higher rate compared to the statewide average, B&M school, and supplemental online respondents, but roughly the same as online school and homeschool respondents. Although PTHS respondents reported high levels of satisfaction with their experience, only 60% indicated that they would participate again, 25% said they were unsure, and 16% said they would not participate in the future. The most common aspects that respondents valued regarding the PTHS was ease of scheduling (67%), availability of course options (65%), and affordability (64%). Regarding potential improvements to programming, survey respondents most frequently mentioned availability of more resources and more course options.

Appendix D

Additional Information Provided By ESP Contracted Online Schools Regarding Contracted Services And Payments

The following information was provided by 5 ESP contracted online schools
No profit was retained at the school level. Administrative and Other Expenditures Per Student Enrolled Administrative Expenses and Services: $1,572 (13.6%) Instructional administrative support and ESP-provided educational and administrative services Other Non-Instructional Costs $76 (0.6%) Other non-instructional school administrative expenses, school events, field trips, K12 Zone, mental health support, etc. Total Administrative Services Expenditures per student $1,648 (14.1%)

Notes: All Program Revenues follow EPSA definition. Categorical funding includes English Learner, READ, Gifted, School Health Professional Grant, Career, IDEA, EASI, and other miscellaneous

ESP provides every student and teacher curriculum and materials associated with his/her courses. Every student is provided a full set of curriculum and access to the applicable Online School account.

ESP offers innovative curriculum and corresponding materials to support academic performance.

ESP delivers digital content and curriculum that meets state and federal standards and develops courses that are specifically designed for online delivery.

In addition, ESP provides instructional tools, including textbooks and supplies, to students to help ensure they have the materials needed for success.

Student Lifecycle Support includes: ESP-provided student recruiting, admissions, enrollment, onboarding, retention and re-registration.

Educational Systems includes: ESP-provided Learning Management System, Student Information System (in addition to the state system) and Course Content Management System to create a synchronous and asynchronous virtual classroom experience."

ESP-provided technology support includes, but is not limited to: School Reports, Tools, Analytics and Monitoring: Maintains the backend services that provide School and student performance insights and analytics on student academics, performance, progress, attendance, and other compliance reporting.

Schools receive access to insights through customized Student Academic Trackers, School Dashboards and Playbooks. Technology Infrastructure & Support: Enterprise cloud-based technology infrastructure and security for Educational, Student Lifecycle and Back-office Systems; provide students, staff, and teachers with 24/7 technology support (e.g., through phone or messaging). Backend Intelligence: Host School's data needs and provide 24/7 monitoring and security.

ESP-provided administrative support includes, but is not limited to: Instructional administrative support; academic and special education programs and compliance support in conjunction with District and State systems and business processes; strategic educational approaches and teacher effectiveness/training; legal expenses; human resources management; business/financial management; and school website support.

The following information was provided by 8 ESP contracted online schools

Multi-district online schools are full-time Colorado public schools, not providers of individual online courses. The school remains governed and overseen by the District, while the ESP provides contracted services supporting the school's educational program and operations. Importantly, MDOL students are already funded less than both the statewide average and comparable students enrolled in single-district online schools. For FY 2025-26, the MDOL rate was $10,480 per pupil, compared with statewide average PPOR of $11,858 per pupil. Single-district online students are funded through the same school-finance formula as other students in their district rather than at the separate MDOL rate. Put simply, MDOL students already receive a funding discount—both relative to the statewide average and relative to students receiving the same full-time online form of education through a single-district online school. What does not receive a corresponding discount are the responsibilities that come with being the student's school. MDOL schools must educate, support, assess, serve, and remain accountable for their students throughout the school year. Many of these responsibilities are inherently people- and staffing-intensive and exist in addition to the cost of course content: licensed teachers providing instruction and monitoring student progress; special education and related services; gifted and talented services; mentors, advisors, counseling and student support; student engagement, attendance monitoring and intervention; assessment administration and testing; enrollment and registration; scheduling; records and transcripts; family support and communication; professional development; recruitment, hiring and personnel management; student information and learning management systems; technology and technical support; financial administration and reporting; regulatory compliance and accountability; and in-person academic support, enrichment, extracurricular activities, field trips, ceremonies, and student and family activities. These are the costs and responsibilities of being a school, not simply providing a course. Online delivery changes how instruction and services are provided; it does not eliminate the substantial staffing, student-support, special education, assessment, technology, compliance, accountability, administrative, and operational responsibilities of a public school. Supplemental online course pricing measures something substantially narrower. JBC Staff, for example, cited Colorado Digital Learning Solutions (CDLS) at $250 per semester course and extrapolated that price to $3,000 for 12 semester courses. Yet the same analysis reports that each CDLS course actually costs $383 to provide and that CDLS receives $715,000 in direct state support. The analysis also acknowledges additional district costs for overhead, IT, student supports, and in-person activities and notes that its cost information was limited to a single source. A state-subsidized price for supplemental online courses is not an equivalent measure of the resources required to educate a student through a full-time public school. The relevant comparison is not the price of online course content versus MDOL funding; it is the total resources required to educate, support, assess, serve, and remain accountable for the student. MDOL schools must provide all of those school-level functions while their students are already funded below both the statewide average and comparable students attending single-district online schools. Any evaluation of MDOL costs and funding should account for that existing funding differential and for the full cost of the responsibilities MDOL schools actually carry.

The following information was provided by 2 ESP contracted online schools

What was the total payment to the ESP(s) by your online school for all contracted work during SY25-26? I answered zero here because I am not aware of the specific information asked for.

The following information was provided by 1 ESP contracted online schools
The LEP retains authority for state reporting, regulatory, compliance, and Special Education purposes.

Appendix E
Methods Of Data Analysis And Research

CDE Data

CDE compiled and analyzed administrative data available from SY2017-18 through SY2025-26, with the specific years available varying by measure.

- This report uses data from the October Count collection to report on enrollment trends. While there are different approaches to calculating enrollment (e.g., funded student count, pupil membership), this report uses funded student count (eligible for state funding) to provide analyses on student groups like PTHS.
- Changes in state funding policy affect how full- and part-time enrollment trends should be interpreted. Changes in kindergarten student funding in SY2019-20 and the transition to Universal preschool in SY2023-24 affect comparisons over time.
- Assessment results reflect only students who participate, lower participation among students in online schools may reduce the representativeness of achievement and growth results.
- State performance frameworks were paused in 2020 and 2021 because of pandemic impacts.
- Online school and PTHS results may fluctuate more from year to year because of smaller student counts and should be interpreted cautiously.
- Enrollment counts for B&M schools, SDOL schools, and MDOL schools include students funded as full-time or part-time in their respective programs.
- Total participation rates combine assessment records across subject areas and grade levels within a school or district. Additionally, PSAT/SAT Reading and Writing results are combined with English language arts results in multi-level schools and districts serving high school.
- Parent excusals from participation in state assessments are counted as non-participants for this report.
- Accountability reporting rules were used to calculate performance data.
- Graduation, dropout, and matriculation analyses use school-level classifications for the applicable reporting years.

Online School Data

Online school data, not currently available to CDE, was collected for schools that were operating in the state during SY2025-26. To expedite the work, given the narrow time frame available, district data collection was done utilizing an electronic survey to enable districts and schools to submit all requirements as easily and quickly as possible. The survey questions only focused on information not currently available through existing state data collection mechanisms. Each district and/or school received a unique link that enabled respondents to work over several sessions, save their work, and return to questions as information and required data was gathered. When possible the survey utilized

ranges or percentage bands rather than requiring exact counts or calculations to minimize burden on district and school administrators. Skip logic was incorporated throughout the survey so respondents were only presented with questions applicable to their program and response options such as "information unavailable" or "information not known" were included where appropriate. The Online School survey covered questions regarding online delivery model details, course enrollment information, standards and accountability, as well as budgetary details. Online schools that contracted with an Education Service Provider (ESP) were asked an additional subset of questions pertaining specifically to their ESP. A total of 63 schools were sent surveys. Surveys were sent to online schools (SDOLs and MDOLs) on record with CDE. Sixty-two online schools completed the survey. Links were available throughout the month of August for districts and schools to complete. For a complete list of survey questions see Appendix F. A mixed method descriptive analysis was conducted based on the information provided by schools across the state. Both quantitative and qualitative data was collected and analyzed.

- Information in several data categories was collected based on ranges to help expedite data collection. As a result, more precise data is not available in some areas.
- Not all online schools answered all questions within the survey, therefore summary statistics were calculated utilizing the available data points only.

Part-time Programs for Homeschool Students Data

PTHS data, not currently available to CDE, was collected from districts and schools across the state regarding PTHS that were operating in the state during SY2025-26 through an electronic survey. The survey questions focused on information not currently available to CDE. Each district and/or school received a unique link that enabled respondents to work over several sessions while gathering and submitting requested data. When possible, survey questions used ranges or percentage bands rather than exact counts or calculations to minimize burden during data collection. Skip logic was incorporated throughout the survey and response options such as "information unavailable" or "information not known" were included where appropriate. The PTHS survey focused on questions covering course types, modes of delivery, standards, accountability practices, enrollment, student outcomes, and budgetary details. A total of 89 schools were sent PTHS surveys. Surveys were sent out to any district or school that indicated in a pre-survey that they had provided programming for homeschool students during SY2025-26. Sixty-nine schools completed the PTHS survey. Links were available throughout the month of August for districts and schools to complete. For a complete list of PTHS survey questions see Appendix G. A mixed method descriptive analysis was conducted based on the information provided by schools across the state. Both quantitative and qualitative data was collected and analyzed.

- Information in several data categories was collected based on ranges to help expedite data collection. As a result, more precise data is not available in some areas.
- Not all schools answered all questions within the survey, therefore analysis was typically conducted utilizing the available data points only.

Colorado Digital Learning Solutions Data

A request for information was sent to CDLS in order to gather financial data as well as information related to course instruction. The specific information requested was as follows:

- The instructional and financial models used to provide supplemental online coursework:
    - Related to the instructional model:
        - Average teacher to student ratio for courses in each grade level span (E, M, H)
        - To better understand the teacher's specific instructional responsibilities and level of involvement in each course;
            - Frequency and types of engagement in teacher-student interactions
            - Degree to which teachers modify/personalize content for students
    - Related to the financial model:
        - Names of providers CDLS contracts with for services such as courses, LMS hosting, etc.
            - Amounts paid for services for 2025-26
        - Costs paid to each provider
        - Structure of agreements (i.e., more enrollments, lower prices,)
        - Number of staff CDLS employs
        -
            - Roles
            - Total amount paid to staff for 2025-26
        - Number of Teachers contracted
            - Total amount paid to contracted teachers
        - Amounts received from Colorado school districts for courses
        - Amounts received from non-public students and out of state enrolled students
- The number and percentage of students receiving online instruction through supplemental programs:
    - Number of course enrollments for fall semester and spring semester for the 2025-26 school year
        - Number of unique students served for each semester
    - Number of course enrollments for fall semester 2026
        - Number of unique students served for each semester

Follow up meetings were held with CDLS administrators to help develop clarity regarding some information that was initially shared. Additional follow-up data was provided.

Parent/Guardian Survey

A parent/guardian feedback survey was developed to collect perspectives from families across the state who are currently or have previously participated in various educational settings including district-run public schools, charter schools, private schools, online schools, and homeschool programs. Respondents were asked what they value in their current educational setting, what they thought could be improved,

and whether they were generally happy. Additionally, respondents were asked about the student's overall experience in their current educational setting and whether they had switched modes in the past or would consider switching modes in the future. Respondents were also asked a series of questions if they indicated their child had previously participated in either supplemental online learning or part-time programs for homeschool students. For a complete list of survey questions see Appendix H. A publicly available link was shared with districts and BOCES across the state and available throughout the month of August for families to complete. Surveys were anonymous and respondents could provide as much or as little information as they chose when completing the survey. Over the month-long collection period 8,047 survey responses were collected. A mixed method descriptive analysis was conducted based on quantitative and qualitative information provided by parents/guardians throughout Colorado.

- All questions in the parent/guardian survey were optional, as a result respondent totals vary across survey areas.
- Although the combined respondent pool included individuals from all educational settings, grade levels, state regional areas, and represented a wide range of racial and ethnic groups, the 8,047 respondents represent only a small fraction (~1%) of the current student population across the state.

Stakeholder Focus Groups

In addition to the parent/guardian survey, three external stakeholder virtual focus groups were held during the month of August. Participants were representatives from online schools and programs across the state. Over 40 individuals participated in the three sessions. Discussion topics across the three sessions were the same and focused on getting perspectives and input on bright spots as well as opportunities for growth across the current online education environment in Colorado. All participants were also provided with the opportunity to provide electronic feedback following the session through an exit survey. To review session discussion topics and exit survey feedback questions see Appendix I.

Additional Research

To aid in the process of the development of potential recommendations for the JBC to consider regarding online education, a desk review was conducted to gather additional nationwide information. Existing national standards for online education developed by the *National Standards for Quality Online Learning* were researched and compared to current Colorado online standards. Further research was conducted on states across the country to collect information regarding other aspects of education components. A review of current state statute, student testing requirements, annual reporting requirements, funding mechanisms, and overall structuring components were researched for comparison and review.

Appendix F

Online School Survey Questions

Main Question	Conditional Questions
Questions provided to all respondents	-
Which of the following schools are you providing information on?	-
Which of the following best describe your online school?	-
Does your online school contract with third-party vendors/providers for any educational services?	-
-	What provider(s) does your online school contract with?
-	What service(s) does your online school contract for?
Which option(s) best describe(s) the primary focus of your online school model? (check all that apply)	-
Of the unique courses offered by your online school during SY25-26, what percentage were ONLY offered synchronously?	-
What kind of synchronous opportunities are available in these (synchronous only) courses? (check all that apply)	-
Of the unique courses offered by your online school during SY25-26, what percentage were ONLY offered asynchronously?	-
Of the unique course offered by your online school during SY25-26, what percentage were offered as a COMBINATION of synchronous and asynchronous?	-
What kind of synchronous opportunities are available in your (synchronous/asynchronous combination) online school courses? (check all that apply)	-
Does your online school offer ANY in-person component? (An in-person component does not necessarily need to be directly related to a course; it could be related to academic support, wraparound services, or socialization.)	-
What is the purpose of the in-person component? (check all that apply)	-
Which standard(s) does your online school align with? (check all that apply)	-
What percentage of the total courses offered by your online school during SY25-26 were taught by a Colorado-licensed teacher? (The number should include all licensed teachers, regardless of whether they are employed directly by the district or contracted by an ESP or another district)	-
What percentage of the total courses offered by your online school during SY25-26 were taught by an educator who was qualified "in-field"? (Qualified "in-field" is defined as a teacher who holds at least one of the following in the subject area in which they	-

have been assigned to teach: endorsement on a Colorado teaching license, bachelor's degree or higher, 36 semester hours, or a passing score on a State Board of Education approved content exam.)	
-	How does your online school specifically define a day of attendance for students? (links to a school website with attendance details are fine in lieu of a written description)
Does your online school differentiate excused and unexcused absences?	
-	What would constitute an excused vs unexcused absence in your online school? (links to a school website with attendance details are fine in lieu of a written description)
Based on your school's definition of attendance, what percentage of the unique enrolled students in your online school during SY25-26 would be classified as truant based on the state definition? (Colorado defines students with four or more unexcused absences in one month and/or ten absences in one school year as truant.)	-
Based on your school's definition of attendance, what percentage of the unique enrolled students in your online school during SY25-26 would be classified as chronically absent based on the state definition? (Colorado defines students absent ten percent or more of the days enrolled during the school year as chronically absent. All absences are included- unexcused, excused, and suspensions.)	-
Does your school use local assessments to track student progress and guide teacher instruction? If so, select all that apply. If not, select "Our online school does not require/use any local assessments"	-
Typically how often are local assessments administered in courses in your online school? (check all that apply)	-
What percentage of students in your online school during the SY25-26 met the requirements to progress to the next grade level?	-
Questions provided to district/charter-run Online Schools	-
Approximately what percentage of unique students in your online school participated in ANY in-person components during SY25-26?	-
What was the highest number of students in a single course during SY25-26?	-
What was the lowest number of students in a single course during SY25-26?	-
What was the total budget appropriated by your district to your online school for SY25–26? (round to the nearest whole number)	-
How many unique full-time staff did your online school employ during SY25-26?	-
How many unique part-time staff did your online school employ during SY25-26?	-
Excluding personnel costs, which of the following additional areas did your online school budget for during SY25-26? (check all that apply)	-
-	What was the total amount your online

	school spent on marketing and communications during SY25-26, not including personnel?
-	What was the total amount your online school spent on co-curricular activities during SY25-26, not including personnel?
Questions provided to ESP contracted Online Schools	-
Does your contract with the Educational Service Provider (ESP) include provisions regarding whether students who are not Colorado residents or who are enrolled outside your district may enroll in the same course sections as your students?	-
-	Please describe the provisions regarding enrollment of Colorado and non-Colorado residents included in the contract with the ESP.
Does your contract with the Educational Service Provider (ESP) include provisions regarding the maximum number of students who may enroll in an individual course section?	-
-	Please describe the provisions regarding the max number of students included in the contract with the ESP.
Does your contract with the Educational Service Provider (ESP) include provisions regarding the maximum student-to-teacher ratio for courses provided to your district?	-
-	Please describe the provision regarding student-to-teacher ratio included in the contract with your ESP.
Does your ESP serve students enrolled outside of Colorado?	-
Are students in Colorado served by the same teachers as students outside Colorado?	-
Considering all online students who are served by your ESP (Colorado and Non-Colorado), what was your average student-to-teacher ratio for courses that were offered during SY25-26?	-
What was the maximum total enrollment in a single course section offered by an Educational Service Provider (ESP) in which your district enrolled one or more students during SY2025–26? For this question, "total enrollment" means all students enrolled in that course section (both Colorado and non-Colorado students).	-
What was the lowest total enrollment in a single course section offered by an Educational Service Provider (ESP) in which your district enrolled one or more students during SY2025–26? For this question, "total enrollment" means all students enrolled in that course section (both Colorado and non-Colorado students).	-
What was the highest number of students served in a single course during SY25-26?	-
What was the lowest number of students served in a single course during SY25-26?	-
Please list any ESPs that your online school contracted with during SY25-26	-

What specific services did your online school contract with the ESP(s) for during SY25-26?	-
What was the total payment to the ESP(s) by your online school for all contracted work during SY25-26?	-
Does your contract with the Educational Service Provider(s) identify the amount or percentage of funding retained by the ESP for administrative, management, or overhead costs?	-
-	Please describe the provisions regarding funding retained for administrative management included in the contract with the ESP.
Does your district receive an accounting or financial reconciliation from the Educational Service Provider(s) showing how payments from the district were expended?	-
-	Please describe the provisions regarding accounting or financial reconciliation included in the contract with your ESP.
Does your district receive accounting identifying the amount retained by the ESP for profit, administrative costs, or overhead?	-
-	What amount was retained by the ESP for profit, administrative costs or overhead?
Use the space below to provide any specific details you feel are important for CDE to know regarding the contracted services the ESP(s) provide and/or the total payment to the ESP(s) for SY25-26.	-
How many unique full-time staff did your online school and/or ESP(s) employ during SY25-26?	-
How many unique part-time staff did your online school and/or ESP(s) employ during SY25-26?	-
Excluding personnel costs, which of the following additional areas did your online school and/or ESP(s) budget for during SY25-26? (check all that apply)	-
-	What was the total amount your online school and/or ESP(s) spent on marketing and communications during SY25-26, not including personnel?
-	What was the total amount your online school spent on co-curricular activities during SY25-26, not including personnel?

Appendix G

Part-time Programs For Homeschool Students Survey Questions

Main Question	Conditional Questions
Questions provided to all respondents	-
Which district are you providing information on?	-
Name of school and/or program as applicable?	-
Which of the following best describes your part-time programming for homeschool students (check all that apply)?	-
Questions provided to schools with only "opt-in" opportunities for homeschool students	-
Approximately what percentage of homeschool students who opted into courses with full-time students completed only (and not more than) the minimum 90 instructional hours required for funding during SY25–26?	--
Approximately what percentage of homeschool students who opted into courses with full time students completed more than the minimum 90 instructional hours required for funding during SY25–26?	-
Approximately what percentage of homeschool students who opted into courses with full time students completed less than the minimum 90 instructional hours required for funding during SY25–26, and were therefore not submitted for funding?	-
Questions provided to schools with a dedicated PTHS for homeschool students	-
What is the total number of unique homeschool students who opted into courses with full-time students during SY25-26?	-
What is the total number of unique homeschool students across ALL part-time programs for homeschool student opportunities within your district?	-
What is the total number of unique homeschool students across ALL part-time programs for homeschool student opportunities within your district who opted into courses with full time students during SY25-26?	-
What grade range(s) did your part-time programs for homeschool students offer courses for during SY25-26? (check all that apply)	-
During SY25-26, how many unique course/offerings were available through your district's part-time program for homeschool students? (Count each distinct course once, regardless of how many sections or times it was offered.)	-
What percentage of students participated in more than one course/offering of your part-time programs for homeschool students during SY25-26?	-
What was the average number of students per course/offering for your part-time programs for homeschool students during SY25-26? (round to the nearest whole number if applicable)	-

What was the highest number of students in a single course/offering for your part-time programs for homeschool students during SY25-26?	-
What was the lowest number of students in a single course/offering for your part-time programs for homeschool students during SY25-26?	-
Approximately what percentage of students enrolled in your district's part-time programs for homeschool students completed only (and not more than) the minimum 90 instructional hours required for funding during SY25–26?	-
Approximately what percentage of students enrolled in your district's part-time programs for homeschool students completed more than the minimum 90 instructional hours required for funding during SY25–26?	-
Approximately what percentage of students enrolled in your district's part-time programs for homeschool students completed less than the minimum 90 instructional hours required for funding during SY25–26, and were therefore not submitted for funding?	-
Of the unique course/offerings for your part-time programs for homeschool students during SY25-26, what percentage were held ONLY on public school grounds?	-
Of the unique course/offerings for your part-time programs for homeschool students during SY25-26, what percentage were held ONLY off public school grounds? (e.g. in the community, at a private residence, at a privately owned business or organization facility)	-
Of the unique course/offerings for your part-time programs for homeschool students during SY25-26, what percentage were held in a COMBINATION of on and off public school grounds?	-
Are all courses/offerings you have in your part-time programming for homeschool students also available to full-time in-person students within the district?	-
Are the part-time programs for homeschool students course/offerings available free of cost to full-time in-person students within the district?	-
Which of the following were focus areas of course/offerings for your part-time programs for homeschool students during SY25-26? (check all that apply)	-
-	What specific course/offerings for your part-time programs for homeschool students related to Workforce and Postsecondary Readiness were available during SY25-26?
-	What specific course/offerings for your part-time programs for homeschool students related to Career and Technical Education were available during SY25-26?
-	What specific course/offerings for your part-time programs for homeschool students related to Civic

	and Community Engagement were available during SY25-26?
-	What specific course/offerings for your part-time programs for homeschool students related to Extracurriculars were available during SY25-26?
-	What specific course/offerings for your part-time programs for homeschool students related to Athletics were available during SY25-26?
-	What specific course/offerings for your part-time programs for homeschool students related to Wellness were available during SY25-26?
What percentage of the unique course/offerings for your part-time programs for homeschool students during SY25-26 covered material that is aligned to current Colorado state standards?	-
What percentage of the unique course/offerings for your part-time programs for homeschool students during SY25-26 have associated state assessments? For this question, state-assessed content areas include English Language Arts, Mathematics, Science, and Social Studies in the grades where Colorado administers statewide assessments.	-
What percentage of the total course/offerings of your part-time programs for homeschool students provided during SY25-26 were taught by a Colorado licensed teacher?	-
What percentage of the total course/offerings of your part-time programs for homeschool students provided during SY25-26 were taught by staff directly employed by the school district?	-
What percentage of the total course/offerings of your part-time programs for homeschool students provided during SY25-26 were taught by non-district staff (e.g. contractors, volunteers)?	-
Which of the following does your part-time programs for homeschool students require educators to provide to their students? (check all that apply)	-
Are all educators teaching in your part-time program for homeschool students fingerprinted directly by your district or BOCES, rather than by a contractor or Educational Service Provider (ESP)?	-
Are background checks for all educators teaching in your part-time program for homeschool students conducted directly by your district or BOCES, rather than by a contractor or Educational Service Provider (ESP)?	-
What percentage of educators teaching within your part-time program for homeschool students hold a Colorado teaching license?	-

Did educators teaching within your part-time program for homeschool students have opportunities to participate in professional development during SY25-26?	-
What mechanisms are in place for your part-time program for homeschool students to ensure that educators adhere to student privacy and safety standards?	-
Are support staff available through your part-time programs for homeschool students to families in the event of challenges and/or struggles while enrolled?	-
Is student attendance tracked in offerings for your part-time programs for homeschool students?	-
-	How is student attendance tracked in course/offerings for your part-time programs for homeschool students?
-	What percentage of the unique enrolled students in your part-time programs for homeschool students during SY25-26 missed 10% or more of their scheduled days/times? (Missing 10% or more of scheduled classes during the school year is defined as chronically absent by the Colorado Department of Education)
What percentage of course/offerings for your part-time programs for homeschool students provided assessments and/or assignments during SY25-26?	-
-	In course/offerings for your part-time programs for homeschool students that provide assessments and/or assignments, is information required to be provided to students about assessment policies and practices?
-	In course/offerings for your part-time programs for homeschool students that provide assessments and/or assignments, are they typically summative, formative, or both?
-	In course/offerings for your part-time programs for homeschool students that provide assessments and/or assignments, are scores and grades recorded and available for review by students and/or families?
-	In course/offerings for your part-time programs for homeschool students that provide assessments and/or assignments, are multiple assessments included?

-	In course/offerings for your part-time programs for homeschool students that provide assessments and/or assignments, are a minimum number of assessments/assignments required?
Are grades given in course/offerings for your part-time programs for homeschool students?	-
-	What percentage of the students in your part-time programs for homeschool students during SY25-26 failed at least one course/offering?
What percentage of students across all course/offerings for your part-time programs for homeschool students in SY25-26 successfully completed the program in which they were enrolled?	-
What criteria are used to determine successful completion of course/offerings in your part-time programs for homeschool students? (check all that apply)	-
-	What is the minimum attendance required for successful completion of course/offerings in your part-time programs for homeschool students?
-	What is the minimum grade required for successful completion of course/offerings in your part-time programs for homeschool students?
What percentage of the enrolled students in your part-time program for homeschool students during SY25-26 dropped out of their course/offering before completion?	-
What percentage of the enrolled students in your part-time programs for homeschool students during SY25-26 took more than one course/offering?	-
For SY25–26, what was the total budget appropriated by your district or BOCES to its part-time programs for homeschool students? (round budget to the nearest whole number)	-
How many unique full-time staff did you directly employ during SY25-26 for your part-time programs for homeschool students?	-
What is the criteria for full-time employment at your part-time programs for homeschool students?	-
How many unique part-time staff did your part-time programs for homeschool students employ during SY25-26?	-
What is the criteria for part-time employment at your part-time programs for homeschool students?	-

Appendix H

Parent/Guardian Survey Questions

Main Question	Conditional Questions
Questions provided to all respondents	-
What is the primary mode of education that your student participates in currently? (If your child attends a traditional public full-time but also takes an extra online course, traditional public school would be their primary mode)	-
Has your student always participated in this primary mode of education?	-
-	What other primary mode(s) of education has your student participated in previously? (check all that apply)
-	What made you move your student out of their previous mode and into their current mode? (check all that apply)
-	What other reason made you move your student out of their previous mode and into their current mode?
Have you generally been happy with your student's current primary mode of education?	-
What do you and your student value most about your current primary mode of education? (check all that apply)	-
What do you and your student feel could be improved about your current primary mode of education? (check all that apply)	-
Are you currently thinking about or planning on moving your student out of their current primary mode of education and into another mode?	-
-	What mode(s) are you considering moving your student into? (check all that apply)
Which of the following best describe your student's experiences in their current primary mode of education? (check all that apply)	-
Does your student currently participate in or has your student previously participated in supplemental online programming (i.e., your student is enrolled in an in-person school and takes one or more online courses as part of their school day)?	-
Does your student currently participate in or has your student previously participated in part-time programming for homeschool students? (Part-time programming for homeschool students has at times been referred to under various names such as part-time enrichment and homeschool enrichment.)	-
In what region of Colorado do you and your family live?	-

What race(s)/ethnicity(ies) does your family identify with? (check all that apply)	-
If your child is/was attending a school full-time in a district run or charter school, are/would they be eligible for free or reduced lunch?	-
What grade, or equivalent, is your student currently in?	-
Questions provided to respondents whose child participated in supplemental online learning	-
Which of the following best describes the type of supplemental online programming that your student is or has participated in? (check all that apply)	-
Why did you decide to have your child participate in supplemental online programming? (check all that apply)	-
Do you plan to continue to have your student participate in supplemental online programming in the future?	-
Have you generally been happy with the supplemental online programming that your students has participated in?	-
-	Please describe the main reason(s) were you generally unhappy with the supplemental online programming
What have you and your student found beneficial about the supplemental online programming? (check all that apply)	-
What do you and your student feel could be improved about the supplemental online programming? (check all that apply)	-
Questions provided to respondents whose child participated in part-time programs for homeschool students	-
Which of the following best describes the type of part-time programming for homeschool students that your student has participated in? (check all that apply)	-
What are the reasons you chose to have your child participate in a part-time programming for homeschool students? (check all that apply)	-
Would you be interested in having your student participate in other part-time programming for homeschool students?	-
Have you generally been happy with the part-time programming for homeschool students that your students has participated in?	-
What have you found beneficial about the part-time programming for homeschool students? (check all that apply)	-
What do you feel could be improved about the part-time programming for homeschool students? (check all that apply)	-
In which setting(s) is(have) the part-time programming for homeschool students offered? (check all that apply)	-
Why did your family decide to homeschool? (check all that apply)	-

Appendix I

Stakeholder Focus Group Session Information

Discussion Questions:

- From your perspective, what are some bright spots and things that are currently working well in the Online Learning environment statewide that policymakers should better understand?
- *Do you have any recommendations to help support bright spots?*
- From your perspective, what are opportunities for growth, challenges, and/or gaps that currently exist in the Online Learning environment statewide that policymakers should better understand?
- *Do you have any recommendations to help address challenges?*

Exit Survey Questions:

1. Which focus group session did you attend?
2. What additional feedback would you like to provide regarding Bright Spots in Online Learning?
3. What additional feedback would you like to provide regarding Opportunities for Growth in Online Learning?
4. Do you have any suggestions about information or data that might help policymakers better understand the landscape of Online Learning?
5. Please use the space below to provide any additional insights, thoughts, questions, or recommendations that you have regarding components you feel are important to include in the RFI submitted to the JBC in November.
6. Optional: Please provide contact information in the event that staff at CDE have follow-up questions based on your responses.

Appendix J
Recommendations & Takeaways

Online Education

Background Takeaways

While B&M schools continue to serve the vast majority of Colorado students, a growing number of families are participating in online school with the most growth concentrated around the time of the pandemic (SY2020-21 to SY2022-23).

The demographic breakdown of online schools is shifting to more closely resemble the demographic breakdown found in B&M schools. There are some noteworthy differences, including for students eligible for free or reduced-price lunch (higher percent in online schools) and multilingual learners (higher percent in B&M schools).

Structural Framework

Takeaways

While in-person opportunities are common across all online schools in Colorado, single-district online schools are more likely to have the majority of their students participating in these opportunities.

On average schools with larger enrollment tend to contract with ESPs compared to schools with smaller enrollment. As a result, budget allocation for schools that contract with ESPs tend to be larger compared to district/charter-run schools.

Only one ESP contracted online school reported expenditures for marketing and communication, however multiple respondents also indicated that they do not receive detailed financial breakdowns regarding expenditures made by their contracted ESP.

Recommendation 1A: Structural Framework

Develop a more detailed definition of public school to help clarify what constitutes a public school and potentially how they are operated and managed. The statutory definition of public school is a school that derives its support, in whole or in part, from moneys raised by a general state, county, or district tax. This broad definition leaves extensive room for interpretation and does not account for the evolution of new learning models that are a part of the landscape in Colorado. When creating new legislation, State Board of Education rules, or Colorado Department of Education practices, such a vague definition can make effective adjustments challenging. Clarifying minimum conditions and standards that constitute recognition of a public school may help to address structural questions such as authorizing practices, funding levels and applicable legal requirements. While many states have yet to develop more detailed definitions of public school, the state of California has created a multi-part definition that brings some clarity to the subject. Additionally, Massachusetts defines public school beyond the limitations of funding streams. Utilizing these states definitions as a starting point could go a long way to helping make future state reform more effective.

Recommendation 1B: Structural Framework

Create additional designations of Blended and Virtual for existing online schools and programs. Information gathered through the online school survey and focus groups demonstrated that a large distinguishing factor between existing online schools is whether a required in-person class component exists. While some schools (Virtual) may provide optional in-person opportunities for students, other schools (Blended) have a set number of required in-person days and a set number of required virtual days within a single course. Currently, these two distinct formats are both classified as online schools or programs; however, the difference sometimes necessitates unique educational, operational, and funding considerations. These additional designations could help to better align future law, rule, and practice across the online landscape. The states of Texas and Michigan both differentiate these two formats.

Recommendation 1C: Structural Framework

Address the structural gap for accountability between single-district online programs and online schools. Currently, Local Education Agencies (LEAs) authorizing single-district online programs are required to submit program information to the Colorado Department of Education (CDE); however, some begin operating these programs without notifying the department. Additionally, CDE has no authority over, or visibility into, the enrollment or performance of these programs. Data for students attending these programs are attributed to and aggregated within their assigned brick-and-mortar school's data, making it impossible to separately evaluate the performance of students in the online program. Currently, CDE lacks an enforcement mechanism to prevent an LEA from fragmenting a single online program into multiple, nominally distinct programs. This gap could allow a single LEA to operate multiple independent online programs, each serving up to 10 out-of-district students, effectively bypassing the requirement for multi-district online school certification. Requiring LEAs to apply to CDE for a program code would allow an initial line of sight into the performance of these programs and then provide necessary information for possible future actions.

Recommendation 1D: Structural Framework

Conduct further research to effectively address potential changes to funding models across the online educational landscape. Information gathered through the RFI process highlights the extensive diversity that exists within Colorado's online landscape. While a number of the recommendations included in this report provide possible avenues for cost savings, adjustments to current per-pupil funding rates require more extensive review that includes consideration of the diversity of online school and program formats, locations, focus areas, and student populations served. Online education, regardless of its delivery model, requires many of the same essential components as traditional brick-and-mortar schools. Accordingly, a comprehensive assessment of these components is necessary to ensure funding is adequate to support student success. Consideration should also be given to distinctions between single-district online schools and programs, mutli-district online schools, potential virtual vs blended designations, and supplemental vs full-time learning. Numerous unique funding formulas exist across the country with regards to online learning, however, it should be noted multiple states including New Mexico, Texas, and Florida currently fund online students at the same per-pupil rate as their in-person counterparts.

Online Authorization

Takeaways

Potential ambiguity exists regarding the roles and responsibilities of online Authorizers.

While a number of states require annual reporting and have cyclical review processes in place for all active Authorizers, Colorado does not currently have comparable requirements or processes in place.

Recommendation 2A: Online Authorization

Clarify and strengthen requirements and expectations for all Authorizers of online schools and programs. Local Education Agencies serve as authorizers of online schools and programs, and are currently provided with substantial latitude to establish online schools that serve students across the state. While Authorizers are expected to ensure that the online schools and programs they oversee adhere to relevant state statute, the specifics regarding how many educational and operational components are set up and handled is left to the Authorizer to determine. Clarification on state expectations regarding areas such as financial management, curriculum and instruction, data gathering, analysis, and reporting, as well as employment and contractor policies and procedures could help strengthen the online educational space as a whole by incorporating more consistency and accountability.

Recommendation 2B: Online Authorization

Require annual reporting and develop a regular review process for single-district online schools and programs as well as multi-district online school Authorizers to enable the Colorado Department of Education to ensure continued quality and compliance. Once an online school or program is established, Authorizers' ongoing responsibilities with regards to academic, operational, financial, and compliance oversight are not reviewed, leaving room for potential issues that could impact both the students served and the state at large. While local autonomy and control has always been a defining feature of Colorado's educational landscape, Authorizers' continued roles and responsibilities in the online educational space should be periodically evaluated to ensure that they continue to adhere to and carry out their responsibilities. The development and implementation of a regular cycle of Authorizer review would help to ensure responsibilities regarding oversight are maintained. The states of Minnesota and Tennessee require annual reports and regular performance evaluations for all Authorizers.

Recommendation 2C: Online Authorization

Develop a mechanism for the state to revoke authorizing power to address failures in roles and/or responsibilities.

Authorizers that demonstrate continued failures in oversight and/or responsibilities should have authorizing power revoked. Minnesota law allows the Department of Education Commissioner to terminate Authorizers' power to charter a school if it is found that they didn't meet state mandated requirements.

Education Service Provider Oversight

Takeaways

Student-teacher ratios differ substantially by school model, with the largest ratios concentrated in multi-district online schools. The ratio is even higher for ESP Contracted schools.

Very little information regarding class size was provided by ESP contracted online schools and none of the schools reported that their contracts had provisions to limit class size or student-teacher ratios.

Based on information provided by 5 ESP contracted online schools that reported on the amount retained by ESPs for profit, administrative costs, and overhead the average was 16%. Information was not provided by the 11 remaining schools so figures may not be representative of amounts retained by all entities surveyed.

As private entities providing a public service, the legal obligations of Education Service Providers regarding state and federal laws, such as the Colorado Open Records Act, are unclear.

Recommendation 3A: Esp Oversight

Develop a list of approved Educational Service Providers. Data provided from online schools for the RFI process brings to light potential issues in transparency regarding Education Service Providers that contract to operate online schools across the state. While a lack of clear information does not necessarily mean that issues exist, it does highlight the opportunity for further transparency and greater oversight in some areas. Some states, such as Florida, create lists of approved service providers that districts and schools are allowed to contract with for educational and non-educational services. The list is established based on research and review conducted by the Department of Education and reapproval is required on an ongoing basis. A similar list in Colorado, regarding potential Education Service Providers could bring more transparency to the space and simultaneously could help to create a more competitive environment, thus potentially lowering costs. If an approved Education Service Provider list were created in Colorado, online schools and programs should only be eligible for state funding if they contract with approved entities.

Recommendation 3B: Esp Oversight

Require Local Education Agencies authorizing online schools to include specific educational provisions when creating their contracts with Educational Service Providers. Information gathered through the RFI process demonstrated that online schools that contract with Education Service Providers in many cases lack a detailed picture of the full educational scope of their providers. To help maximize transparency and ensure Colorado students are receiving a quality education, the state should establish consistent educational requirements that Authorizers must include in contracts with ESPs. These provisions should include but not necessarily be limited to, maximum allowable class sizes, maximum allowable student-to-teacher ratios, and the prohibition of individual teachers being utilized to teach Colorado and non-Colorado students, either within the same section or across sections.

Recommendation 3C: Esp Oversight

Require Local Education Agencies authorizing online schools to include specific financial provisions when establishing their contracts with Educational Service Providers. Information gathered through the RFI process demonstrated that Local Education Agencies that contract with Education Service Providers (ESPs) typically are not privy to the full scope of financial details of their ESP. The state should establish consistent financial provisions that Authorizers must include in contracts with ESPs. Provisions should include Authorizer access to detailed reporting on direct educational services as well as non-educational components. The addition of these provisions could help to reduce non-educational costs of doing business with ESPs across the state.

Recommendation 3D: Esp Oversight

Clarifying what legal obligations apply to Local Education Agencies should also apply to Education Service Providers. As public entities, Local Education Agencies have numerous legal requirements under state and federal law (e.g., compliance with the Colorado Open Records Act, financial transparency reporting, ensuring FAPE, providing 504 accommodations). While Education Service Providers (ESPs) are acting as a public entity providing public services for Colorado students, it is often unclear what requirements apply to ESPs as private entities.

Accountability and Expectations

Takeaways

State testing participation rates are low across online educational settings, with SDOLs reporting slightly higher participation rates than MDOLs.

Although online students only represented 4% of the overall student population in Colorado in SY2025-26, they made up 29% of the statewide parent excusals for state testing. The addition of remote proctoring has contributed to a modest increase in participation rates for online schools.

While online schools have improved their overall SPF performance since 2018, a persistent gap remains when compared to B&M.

Math achievement and growth for students in online schools is consistently lower compared to students in B&M schools. This is true across school levels, particularly at the high school level when examining growth.

While gaps in student achievement and MGP are smaller for ELA, differences persist particularly when comparing MDOLs to B&M populations. SDOLs have lower SPF points for ELA in comparison to B&M schools, but their growth in some years surpassed B&M schools.

Over the last few years, graduation, dropout and matriculation rates have been trending in the right direction for online schools. They do not, however, perform as well as B&Ms. This is especially true for matriculation. While consideration should be given to needs and characteristics of students online schools are attracting, the state also needs to ensure foundational expectations for supporting students in their postsecondary and workforce readiness regardless of educational setting.

Other states utilize incentives and/or penalties to encourage schools to work to maximize participation rates on state assessments.

Great variability exists across online schools in defining a day of attendance. ESP contracted schools tend to have broader and less specific definitions compared to district/charter-run online schools.

Recommendation 4A: Accountability And Expectations

Adjustments to the parent opt-out process could be utilized to help increase state assessment participation rates. Colorado currently provides parents with the right to opt their children out of state testing. In survey responses and focus groups, many online leaders indicated that one cause of low participation rates was the schools' inability to ensure stronger assessment participation due to current opt out regulations. While some other states also allow parents to opt-out of state testing, many have specific limitations. Pennsylvania, Oregon, and Minnesota all allow parents to opt their student out of testing but include specific requirements or limitations to do so. While some states do allow for parent opt-out, several prohibit opt-out including Texas, Oklahoma, and Arkansas. Changes to parent opt-out laws and corresponding state board rules could help increase participation rates.

Recommendation 4B: Accountability And Expectations

Adjustment to how parent opt-outs are incorporated into the District and School Performance Frameworks. Colorado's accountability system assigns plan types based to a large extent on achievement and growth which rely on state assessment scores. When schools have extremely low participation, it is difficult to apply a state accountability system transparently and consistently for all sites. Online schools, which have notably low participation, essentially sidestep safeguards that policymakers have placed to ensure that all schools meet basic thresholds of performance - and do not necessarily qualify for support and consequences related to low performance. This erodes trust in the system given the lack of transparency and effective oversight in the online space. Most states, including Texas, Florida, and Alaska, incorporate the federal 95% participation benchmark into their accountability systems, with participation rates below this level affecting school performance ratings. Consideration may be given to adjusting how parent opt-outs are calculated within the performance framework or raising the threshold at which the state board intervenes after persistent low participation.

Recommendation 4C: Accountability And Expectations

Incentives and/or penalties could be utilized to encourage Local Education Agencies to work to increase state testing participation rates. Simply increasing minimum statewide expectations regarding testing participation rates may not result in a significant change in participation rates for online schools across the state. However, incentives and/or penalties could be utilized in schools and districts to help increase testing rates. Florida calculates performance "grades" for schools and districts, which are calculated in part from state assessment scores that can be impacted by participation rates. If performance grades are high or improve, schools gain greater authority over the allocation of certain components of their budget. In Texas, low participation rates can lead to low performance ratings which can lead to specific state intervention and additional requirements put in place for low performing schools. Currently, Colorado lowers school ratings for low test participation that is not due to parent opt-outs. The state of Colorado could utilize other measures to encourage increased participation statewide including potential incentives such as offering technical assistance or grants or potential penalties such as revoking authorization, denying recertification, or initiation of early review could be implemented.

Recommendation 4D: Accountability And Expectations

Develop minimum statewide online education expectations for attendance and engagement. Information shared by online schools and feedback provided during the online school focus group sessions highlighted many inconsistencies and uncertainties regarding how to meaningfully track and address student attendance and engagement in a virtual setting. While these overarching components are arguably straightforward to track in brick-and-mortar settings, the virtual and often asynchronous nature of online learning complicates the approach. Although the need to set clear expectations in an online setting is necessary, specifics will likely need to differ from the brick-and-mortar setting to help preserve the flexibility of online instruction. Attendance expectations should address consistent methods of tracking and documenting attendance in both synchronous and asynchronous settings, as well as potential protocols and policies when attendance declines. Engagement expectations should focus on standards regarding regular student-educator interactions, as well as identification and response to students who have disengaged to help ensure and track student wellness. Arizona, Kansas, Minnesota, and Mississippi all have some level of statewide standards regarding how attendance is tracked and reported. The states of Arizona and Pennsylvania have authorized legislation that aims to directly address engagement issues of online students.

Certification and Designation

Takeaway

Based on data reported from SDOL schools through the RFI process, some concerns were raised regarding quality standards, teacher qualification, and licensing practices.

Recommendation 5A: Certification And Designation

Require single-district online schools and programs to complete the same application process as multi-district online schools in order to begin operations. Based on data provided by online schools across Colorado for the RFI process, in many cases no consistent and substantial educational or operational differences were found to exist between single-district online schools (SDOL schools) and multi-district online schools (MDOLs) other than the limitations on out of district students. Substantively, MDOLs and SDOL share more similarities than differences, and most states do not distinguish between the two through separate designations. As a result, a corresponding application process for SDOL schools and programs would be beneficial for the state to implement to help ensure more consistent and transparent practices. Further consideration could also be given to requiring SDOL schools to participate in a recurring review and recertification process if one is developed by Colorado in the future.

Recommendation 5B: Certification And Designation

Establish a recurring process of review and recertification for multi-district online schools. At present, once an multi-district online school (MDOL) has been initially certified no subsequent review process occurs, and the Authorizer has broad discretion to modify their model. Given the quickly evolving nature of online learning across the state, formal review should take place on a regular basis to help ensure continued compliance and best practices are maintained. Colorado should establish annual reporting processes and recurring review processes through which MDOLs demonstrate continued compliance with state requirements and the ability to provide quality educational programming. The process could build on existing annual reporting processes. The process should include a comprehensive review on a regular cycle (e.g., every five years) with the ability to initiate earlier review if and when significant academic, operational, financial, assessment participation, or compliance concerns arise. The review should complement the ongoing responsibility of the local Authorizer and the state's existing accountability system. These types of annual reports and recurring reviews are becoming more common across the country. Arizona and Pennsylvania both require annual reporting for online schools, while Massachusetts and Pennsylvania both conduct extensive reviews of school performance and operations in their online schools on a regular three to five year cycle. Annual reporting and a reauthorization process for MDOLs was previously in Colorado state statute, however, the requirements were repealed in 2011.

Recommendation 5C: Certification And Designation

Enhance data requirements and add a periodic eligibility audit to the annual redesignation process for online schools designated as Alternative Education Campuses. Online schools designated as an Alternative Education Campus (AEC) are required to complete an annual redesignation, and this redesignation should be enhanced for online schools to include a periodic, comprehensive eligibility audit to verify AEC status. Site visits should also be included in the redesignation process to ensure student needs and state requirements are being met.

Supplemental Online Learning

Takeaways

Data provided by CDLS appears to indicate that supplemental online learning populations across the state are growing and at least a small population of students are utilizing supplemental online learning as an alternative method of enrolling in a full-time online educational setting.

A majority of respondents from the Parent/Guardian survey indicated that their student had participated in supplemental online courses that have existing state standards and a corresponding state assessment for most grade levels, suggesting that additional reporting requirements for LEAs could provide relevant student outcome information to CDE.

Recommendation 6A: Supplemental Online Learning

More clearly define the role of supplemental online programs in the online learning environment and create a clear bright-line between full-time online schools and programs. The use of supplemental online courses has expanded with limited oversight. These courses are intended to supplement a student's education by providing one or more courses in addition to the brick & mortar (B&M) education program. In some cases, districts appear to use supplemental online courses to provide students with a fully online schedule without establishing a single district online (SDOL) school or program or a multi-district online (MDOL) school. This practice blurs the distinction between supplemental coursework and full-time education, which can create difficulty in student classification, reporting, and applicable oversight. Clear criteria should be developed to differentiate a student receiving online education from a B&M student taking supplemental online courses. Supplemental online learning could be defined based on a limited number of classes taken (e.g. no more than two courses per student in order to be classified as B&M). The developed criteria should also clarify when offering online coursework requires an SDOL or MDOL designation. If a defined threshold is created, it should apply to both state-designated and non-state-designated supplemental providers. This practice would mirror the practices of some other states, such as Arizona and Florida which both distinguish full-time from part-time online students both programmatically and for funding purposes.

Recommendation 6B: Supplemental Online Learning

Develop a list of approved supplemental online service providers and/or ineligible supplemental service providers. As recommended for Education Service Providers, supplemental service providers could be evaluated by the Colorado Department of Education and either approved or barred from providing services within the state. Approved supplemental service providers would be eligible as providers to work directly with districts or for consideration as the potential future provider for state supported supplemental learning. An approved list of providers could reduce costs to both districts and the state through increased competition across the supplemental online landscape. If an approved list is created, it should apply to both state-designated and non-state-designated supplemental providers. As mentioned previously, Florida maintains a list of approved providers while Texas maintains a list of ineligible providers.

Recommendation 6C: Supplemental Online Learning

Develop increased reporting requirements and oversight practices for Local Educational Agencies that partner with supplemental online providers. At present, LEAs report limited data on the use of supplemental online learning providers regarding financial, operational, or academic information. With the apparent growth of supplemental online learning across the state, it has become important to ensure that students utilizing these educational options are receiving a quality education. Reporting requirements and oversight practices should be created for Local Educational Agencies that work with supplemental learning providers, to help ensure that CDE has the necessary information to effectively assess student outcomes.

State Designated Supplemental Online Learning

Takeaways

Small rural districts currently represent a very small percentage of the overall enrollment of state supported supplemental online learning provided by Colorado Digital Learning Solutions.

Students enrolled in state supported supplemental online learning are currently funded twice, once at the LEA level and again through a lump sum provided by the state. However, the lump sum provided by the state is not adjusted based on the number of students that enroll, creating a unique and potentially ineffective funding model for state supported supplemental online learning.

Recommendation 7A: State Designated Supplemental

Require the provider designated as the state's supplemental online learning provider, through the state designated supplemental learning program under §22-5-119, to provide the same student level data as Local Education Agencies are currently mandated to provide. With a growing number of students enrolling in supplemental online learning, it is critical for the Colorado Department of Education (CDE) to receive data related to student outcomes for students enrolled in courses provided by the state designated supplemental provider in order to help assess program quality and student success. Access to this data will require ongoing authorization for Local Education Agencies to provide relevant data to the state designated provider and CDE in order to provide better transparency and oversight in the future.

Recommendation 7B: State Designated Supplemental

Consideration could be given to the state expanding the type of entity that could administer and manage the state's designated supplemental online learning program. At present, C.R.S. § 22-5-119 requires that the state's designated supplemental service provider can only be administered and managed by a board of cooperative education (BOCES), severely limiting the potential pool of administering entities. If the state were to expand the applicant pool to potentially include school districts, Charter School Institute, private organizations, and the Colorado Department of Education, cost savings may be realized as a result of a more competitive market. Florida's part-time online instruction (FLVS Flex) is administered and managed by a state-accredited online public school, while in Mississippi the Department of Education manages, and oversees online instruction.

Recommendation 7C: State Designated Supplemental

Additional research and consideration could be given to the state reevaluating the role of a designated statewide provider of part-time online learning, along with the corresponding funding structure that supports it. Currently, the designated state supplemental online provider, receives a lump sum from the state for providing services and individual registration fees from districts. At the same time, school districts with students in state-supported supplemental courses can report those hours to the state when calculating per-pupil funding. As a result, the state is arguably paying for those students twice – once at the Local Education Agency level and again through the state-designated and funded supplemental online provider. Conversely, the appropriation for the state designated online supplemental provider is a flat amount regardless of how many students it serves, whereas fully online schools receive funding on a per-pupil basis. Additional supplemental learning providers partner with some districts to provide similar services without direct support from the state; however, cost information for those supplemental courses is not widely available to conduct a direct comparison to definitively verify. Consideration should be given to the state-supported supplemental online provider's role in part-time online learning and whether changes to the existing delivery model could help lead to meaningful changes in the existing funding structure.

Part-time Programs for Homeschool Students

Background Takeaways

While PTHS enrollment has increased overall since SY2017-18, in SY2025-26 more students have moved from PTHS to B&M then moved from B&M to PTHS over the same time period.

The majority of homeschool students participating in PTHS are enrolled in dedicated programs as opposed to participating in opt-in courses.

Takeaways

Roughly half of LEPs that only allow opt-in courses for homeschool students reported that the majority of students participate in more than 90 hours of instructional time, while roughly one-quarter reported that the majority participate in only the minimum required 90 hours.

Data reported by LEPs with "dedicated" PTHS suggests that multiple programs may not comply with requirements regarding educator guidelines and many PTHS offerings are not available to full-time students within the LEP.

Recommendation 8A: PTHS

Conduct a review and in-depth enrollment analysis of part-time programs for homeschool students in response to significant changes in the program landscape as a result of recent legislative change and expected state board rulemaking.

Passage of amendments L.042 and L.033 of the School Finance Act in May of this year, immediately changed the landscape of part-time programs for homeschool students. Additionally, current work by the State Board of Education regarding a legislatively mandated rule making process for the space has created significant unknowns regarding potential changes in enrollment of homeschool students in these programs. While some recommendations regarding part-time programs for homeschool students have been developed for this report, further review and analysis should be conducted once all laws and rules take effect to more accurately assess a starting point before moving forward. Having a clear picture of how changes have already impacted the space will help better align potential additional changes.

Recommendation 8B: PTHS

Consideration could be given to providing funding to Local Education Providers for "opt-in" homeschool students through a tiered or pro-rated scale based on the number of hours the student spends in the classroom. At present, districts that allow homeschooled students to "opt-in" to existing academic core classes can count those students towards their state funded enrollment count and receive half the rate of pupil funding as long as the student participates in at least 90 hours of class time in the fall semester (¼ of the overall course time needed for full pupil funding). Data gathered for this RFI from opt-in schools found that a majority of opt-in students participate in at least the minimum 90 hours or class time required for part-time funding. Research conducted for this RFI found that many states that allow this type of opt-in participation by homeschool students, provide pro-rated funding to the district based on the number of hours in class. Minnesota, New Mexico, and Utah all were found to provide pro-rated funding typically based on the time homeschool students spent in class.

Recommendation 8C: PTHS

Consideration could be given to limiting course offerings of dedicated part-time programs for homeschool students to only those courses already available through the school running the program and available free of charge to all full-time students. Currently, many dedicated part-time programs for homeschool students provide offerings that are unique from those offered to full-time in-person students. Numerous offerings cover course content that does not directly align with existing state standards or have corresponding state assessments. Additionally, information gathered from schools with a dedicated program demonstrated that in many cases these program offerings are not available to full-time in-person students. This raises a question regarding effective state oversight, the ability to assess course quality, and equitable access of course offerings for full-time B&M students. If part-time programs for homeschool students were limited to only offering courses already available through the school running the program, oversight and equitable access issues would be eliminated.

Recommendation 8D: PTHS

Consideration could be given to a funding stream that would be allocated to dedicated part-time programs for homeschool students, which would be separate from current public school funding. Many dedicated part-time programs for homeschool students currently provide innovative and impactful educational opportunities for homeschooled students. However, information gathered from schools that provide these programs as well as parents of students that have participated in these programs highlighted the fact that these programs are far different than what is offered by public schools across the state. Content for many of the courses offered through these programs do not have corresponding academic standards to assess quality. Additionally, programs are often held off public school grounds and in many cases not available to traditional full-time students within the district. If funding for these programs comes from public school allocations, then current laws, rules, and policies that govern B&M schools should be applied to these programs. However, a separate state allocation for programming of this type could enable schools to design innovative programs that are not confined by current regulations. Flat rate or prorated reimbursement models could be considered to replace the standard PPR allocation. Numerous competitive grant programs such as the former Career Development Incentive Program could be utilized as a starting point for design and development.

Recommendation 8E: PTHS

Consideration could be given to eliminating funding to Local Education Agencies for part-time programs for homeschool students and instead developing a school choice funding program available to families across the state. Several states across the country provide funding, often in the form of grants, to families for educational expenses of their choosing. Arizona, Florida, Minnesota, and Texas all have funds available for families. The specifics of the programs vary by state but many limit the use of funds, require accounting of expenditures, and prohibit families who receive funding to enroll their students in other educational settings that receive state funding. In some cases access to funding is tied to an application family income is taken into consideration when awarding funding. Although this type of funding program would eliminate current complications that exist as a result of funding Local Education Agencies for part-time programs for homeschool students, this type of program would likely come with unique challenges and considerations and may impose significant administrative burden on the state.