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International Association for K-12 Online Learning

PROMISING PRACTICES IN ONLINE LEARNING

Funding and Policy Frameworks for Online Learning

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iNACOL
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About *Promising Practices in Online Learning*

Online learning within K-12 education is increasing access and equity by making high quality courses and highly qualified teachers available to students. Online learning programs offer courses, academic credits and support toward a diploma. They vary in structure, and may be managed by a state, district, university, charter school, not-for-profit, for-profit, or other institution. Over thirty states have state-led online programs and more than half of the school districts in the United States offer online courses and services, and online learning is growing rapidly, at 30% annually. This growth is meeting demand among students, as more than 40% of high school and middle school students have expressed interest in taking an online course.

The most well established K-12 online learning programs are more than ten years old, and many programs have between five and ten years of operating experience. The newest programs are building on the expertise of those early adopters, as well as the experience of online learning in postsecondary institutions and the corporate world. A body of knowledge, skills and practices has been developed by individual programs, in collaboration with practitioners, researchers, and policymakers. Because there are so many types of online programs (full-time, supplemental, state-led, district-level, consortium), there are also many different approaches to teaching, student support, professional development, and other issues.

This series, *Promising Practices in Online Learning*, explores some of the approaches being taken by practitioners and policymakers in response to key issues in online learning in six papers being released throughout 2008 and 2009:

- Blended Learning: The Convergence of Online and Face-To-Face Education
- Using Online Learning for Credit Recovery and At-Risk Students
- Management and Operations of Online Programs: Ensuring Quality and Accountability
- Socialization in Online Programs
- Policy and Funding Frameworks for Online Learning
- A Parents' Guide to Choosing the Right Online Program

The title, *Promising Practices*, deliberately avoids the term "best practices." There are too many approaches to online learning, and too many innovative teaching and learning strategies in the 21st century, for one method to be labeled "best." Instead, this series aims to discuss the issues and explore examples from some of the many online programs across the country, with a goal of illuminating some of the methods showing the most promise.

Online learning offers the advantage of personalization, allowing individualized attention and support when students need it most. It provides the very best educational opportunities to all students, regardless of their zip code, with highly qualified teachers delivering instruction using the Internet and a vast array of digital resources and content. Through this series of white papers, we are pleased to share the promising practices in K-12 online learning that are already under way.

Policy and Funding Frameworks
for Online Learning

In at least 44 states across the country, students are logging in to learn at all times of the day and night—accessing courses they might otherwise be unable to take, interacting with students they might otherwise never know, and working with highly qualified teachers they otherwise could not access. In these and countless other ways, online learning provides new and remarkable educational opportunities and student outcomes.

While the viability and popularity of online learning is gaining widespread acceptance, the policy needed to support its growth is lagging. The continued success and sustained growth of online learning requires state education policy frameworks to be adjusted. The issues are varied and sometimes complex, but as we delve into them, what emerges is quite interesting: by creating frameworks for online learning policy development, exciting possibilities arise for positive policy change that promotes reform and benefits education as a whole.

To lay the groundwork, though, it might be useful to consider why online learning is even worth the trouble. We'll also consider the kind of policy problems that have arisen as online learning has taken hold. What do strong policy and funding frameworks look like, and what specific benefits do they afford? Finally, which online learning policy and funding structures hold promise for all modes of learning?

Online Learning Policy Challenges

Online learning continues to grow rapidly every year, with programs and states reporting annual growth rates of 15% to 50%. Yet many state policies are woefully behind this rapid growth. One typical policy with wide-ranging implications, for instance, is the way in which funding is linked to student attendance. Most states predicate student counts on the idea that the student is in a physical classroom and can be counted in a census-like fashion. In the online world, students are most often not in a physical classroom, and therefore the very language in such census exercises does not fit virtual learning, resulting in a lack of funding for online programs or the need to change accounting practices.

Education codes like this envision physical spaces: teachers at chalkboards in the front of a room; students at desks in schools they reach on yellow school buses; and buildings with lunchrooms,

libraries, and gyms. Indeed, education policy often addresses issues far from the subject of actual learning. Very little policy is tied directly to student achievement, and such policies are behind today's learning realities.

Online learning creates the challenge to update policy to address a new and exciting form of learning. At the same time, it presents the opportunity to upgrade policy to shift the focus to student achievement instead of inefficient proxies, such as seat time, or measures based solely on inputs, such as state content standards.

Why Online Learning is Worth the Effort

Online learning presents exciting promise to students, which many educators now understand and support. Still, some policymakers may still not understand its value, and a quick review of what virtual learning offers our students is appropriate.

Online learning is—

Largely public and democratically accessible: Of the estimated million enrollments in online learning, most are within a public education framework. Online learning is a remarkable opportunity for students to access high quality courseware and first-rate teachers—regardless of location or socio-economic status.

Academically and demographically blind: Gone are the days when it was assumed online learning was only for gifted students. Today, many students who struggle in traditional classrooms find that they fare better online. You'll find successful learners in online ESOL and reading courses and in programs specifically for at-risk students. Why? In a word: flexibility. Online learning allows students to choose when, where, and at what pace they want to learn, so personalization is possible in ways that, before now, few educators or students could imagine.

Engaging: The National Survey of Student Engagement[1] concluded that online teachers and course developers, compared to traditional educational approaches, may be more intentional about engaging students with themselves, with one another, and with the content precisely *because* they are online. Practitioners and developers of online learning tools are capitalizing on Web 2.0 tools and emerging approaches such as games and other interactive technologies to assist in the process of driving students into higher level thinking processes. For example, one game-based online course allows students capture their thought processes as they learn and visually manipulate their snippets of learning throughout multiple units of study, allowing them to make motivating connections, construct deeper and more varied learning paths, and extract significant meaning from the content.

Social: It is a myth that students in online programs are socially handicapped. While many online students take the bulk of their courses through traditional venues, even students who take all classes online are typically involved in sports, clubs, lessons, churches, and community events. In fact, sports competitors or performers, for example, may choose online learning because it allows them to go further in their training or competition than the restrictive calendar and day-to-day schedule of

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[1] *The National Survey of Student Engagement*, Indiana University Center for Postsecondary Research, 2008

traditional classrooms. Virtual schools have also worked intentionally to include socialization through online conferencing, meet-ups, field trips, clubs, and social gatherings. In addition, the online environment itself also has a way of engaging students who might otherwise be reluctant. Shy students, for instance, often find it easier to participate online, and the peer pressure that so often exists in classrooms is greatly reduced online.

Rigorous: Students who take an online course with the expectation that it will be easier quickly realize their mistake. Well-designed online courses are not condensed or easier versions of regular courses. They cover the same topics, and are aligned to the same state content standards, as all public school courses in the state. They require active participation and operate under supervision of state-certified teachers. They require students to take state assessments and to demonstrate mastery of topics. At the same time, because of the online interactions, games, teleconferences, and other elements, students may more readily process information in this environment.

Highly teacher-facilitated: While technology is clearly a big component of online learning, virtual schools are still centered on teaching and learning, which means teachers are far more important to students than the technology. The technology facilitates communication between teachers and students, delivery of content, assessment, and other key elements of education. It is still critical that the teacher possess the interpersonal skills that allow for a strong teacher-student working relationship. The relationship between student achievement and teacher quality, expectations, and care is well documented. The best online programs are built solidly on these principles, while the technology provides the necessary "invisible" support.

Transformative: Teachers who transition to online instruction often become the biggest evangelists for the medium because of the level of individualization in online learning. For the first time, teachers can truly help each student reach a level of mastery, rather than forcing students to move ahead when they aren't ready, simply because the calendar dictates it. Indeed, the ability of online classes and schools to personalize learning is nothing short of transformative for all of public education.

Dimensions of Online Programs:
Understanding the significance for policymaking

In order to fully grasp the impact of poor or non-existent policies, it is important to understand the various dimensions of online learning. Programs vary widely in comprehensiveness, reach, delivery methods, locus of control, and more.
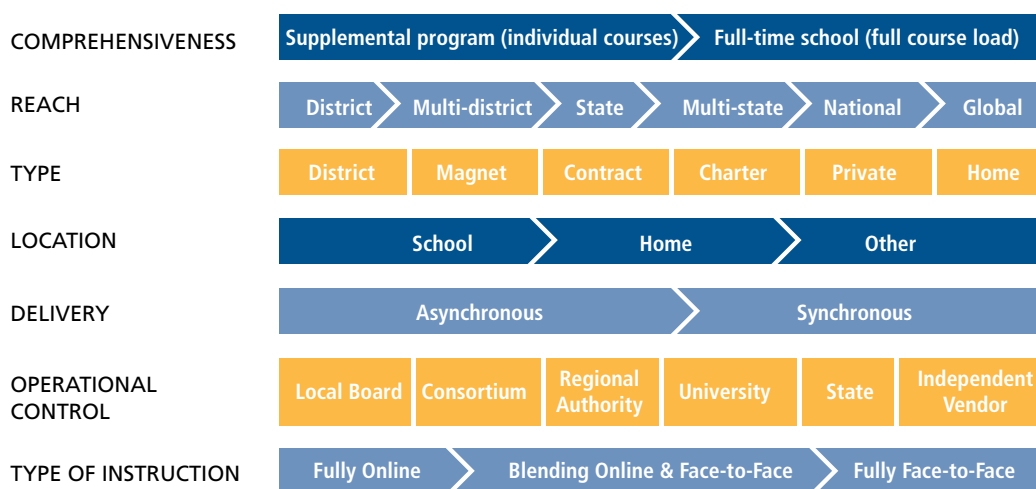
THE DEFINING DIMENSIONS OF ONLINE PROGRAMS

COMPREHENSIVENESS	Supplemental program (individual courses)		Full-time school (full course load)		
REACH	District	Multi-district	State	Multi-state	National	Global
TYPE	District	Magnet	Contract	Charter	Private	Home
LOCATION	School		Home		Other	
DELIVERY	Asynchronous		Synchronous			
OPERATIONAL CONTROL	Local Board	Consortium	Regional Authority	University	State	Independent Vendor
TYPE OF INSTRUCTION	Fully Online	Blending Online & Face-to-Face	Fully Face-to-Face			

Figure 1: Defining dimensions of online programs. Figure adapted from Gregg Vanourek, *A Primer on Virtual Charter Schools: Mapping the Electronic Frontier*, Issue Brief for National Association of Charter School Authorizers, August 2006

Of the dimensions shown in Figure 1, four are particularly pertinent to policy issues:

- **Comprehensiveness:** Although programs may provide both full-time and supplemental options, most offer primarily one or the other. The way in which a program is funded and regulated rests largely on this variable because in most cases, supplemental programs do not directly generate funding based on the state education funding formula, while students enrolled in full-time online schools usually do.

- **Reach:** Several states draw a distinction between online programs that primarily serve students in their own districts, and programs that serve students across multiple districts, the entire state—or even beyond. Because funding for K-12 education in the United States has historically been structured around local control, education and policy leaders have never had to deal with questions like, "Who pays for the teacher's salary if he or she teaches from another district or even another state?" or "Who gets the state's per-pupil funding allotment—the district, the virtual learning provider, or some combination?" Questions that deal with reach typically center on issues such as teacher certification and reciprocity, variations in graduation requirements, portability of credits, meeting state standards and accreditation requirements.

- **Blended learning:** Schools may deliver instruction online, face-to-face, or in some kind of combination. An increasing number of schools are blending online and face-to-face learning, with implications for policymaking related to the location and financing of physical facilities, attendance, requirements for teachers, etc.

- **Location:** Since the beauty of online learning is directly related to its "any time, any place" flexibility, it is important to rethink policy as relates to attendance at a physical school. The establishment of physical facilities that might serve multiple districts also presents policy challenges related to funding, supervision of instruction, understanding who is ultimately responsible for student grades and progression, graduation requirements, and more.

Defining Online Schools and Programs

Given the wide range of types of online programs that exist, policymakers must identify and define the types of programs that they intend to be covered by specific policies. Some states have created requirements for some online schools but not others, and may not even know of the existence of some online programs. This may not be a problem, but if the state is choosing to regulate some online programs and not others (even if the regulations are simply reporting requirements), it should have a consistent rationale for which programs are regulated and why.

The problem is illustrated by an Idaho state audit that looked at virtual charter schools and district programs:

> Staff at the [Idaho] Department of Education are not aware of any other school in Idaho offering [an online] program [other than online charter schools]… However, the department does not have a process for determining whether any other school is offering a virtual program. Commission staff are also not aware of any other school offering virtual programs, but stated they would only be aware of a virtual program offered at a school they authorized…[2]

The Idaho legislature responded, in part, by creating a legal definition of virtual schools as "… a school that delivers a full-time, sequential program of synchronous and/or asynchronous instruction primarily through the use of technology via the Internet in a distributed environment."[3]

Some states define the key elements of an online program as 1) students and teachers are geographically separated, and 2) instruction takes place using the Internet or other distributed technologies. For example, Wisconsin's Act 222 defines a virtual charter school as: "[A] charter school… in which all or a portion of the instruction is provided through… the Internet, and the pupils enrolled in and instructional staff employed by the school are geographically remote from each other."[4]

The Texas legislation that created the Virtual School Network provides a robust definition of "electronic courses" as courses in which:

1. Instruction and content are delivered primarily over the Internet;
2. A student and teacher are in different locations for a majority of the student's instructional period;
3. Most instructional activities take place in an online environment;
4. The online instructional activities are integral to the academic program;
5. Extensive communication between a student and a teacher and among students is emphasized; and
6. A student is not required to be located on the physical premises of a school district or open-enrollment charter school.[5]

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[2] http://www.legislature.idaho.gov/ope/publications/reports/r0702.pdf
[3] 2008 Idaho House Bill 423, http://www3.state.id.us/oasis/2008/H0423.html
[4] http://www.legis.state.wi.us/2007/data/acts/07Act222.pdf
[5] http://www.legis.state.tx.us/BillLookup/History.aspx?LegSess=80R&Bill=SB1788

The "Hybrid" Dilemma

The growth of the use of online resources in physical schools requires that policymakers not create policies that cover more schools than intended. Until recently, questions about how to define blended vs. online learning have not been clearly addressed. At what point does a course switch from being blended to online? What percentage of online learning marks the threshold that triggers online learning policy? Recent research and legislation have revealed the need to distinguish between schools that are 1) using the online environment to an extent that they should be subject to online policies, and 2) those schools that may be using the online environment, but not at this threshold level.

Because there is a continuum between programs that are fully Internet-based and operate with students and teachers at a distance and programs that are fully face-to-face, it is especially difficult to define the difference and set appropriate policy. Some state policies, such as in Indiana, define online or virtual schools based on a percentage of instruction delivered online (for example, less than 50% for virtual charter schools in Indiana). Tennessee's online learning law, in contrast, states that virtual schools are those that provide a "significant portion" of instruction online, which leaves open to interpretation what a "significant" amount of instruction means.

The question of how to determine the percentage of content or instruction delivered online remains. If a student is reading paper-based text at a distance from the teacher, does this qualify as "online"? The answer seems to be "no," but if so, this raises questions about situations in which a student reads text on a computer screen. Does the instruction count as online? What if she prints out the text and reads it offline—does that mean the instruction is not considered online? This issue is particularly challenging in lower grade levels, where students typically spend less time working online than their high school counterparts, and instead may be reading print materials, writing in a journal, or calculating math problems in a workbook. If these activities are assigned and graded by an online teacher, do these activities count as time online? The issues and questions are complex, so they've often been left unaddressed and, often, not even understood.

One approach to ensuring that physical classrooms using online resources are not covered by online learning policies is to explicitly exempt blended learning. Florida's 2008 law takes this tack, stating: "A provider of digital or online content or curriculum that is used to supplement the instruction of students who are not enrolled in a virtual instruction program… is not required to meet the requirements of this section." In this case, "this section" refers to the stipulations given to providers that touch on teacher certification, location of offices within the state, accreditation procedures, and other operational issues.

First Principles

With so many issues and variables to consider, policymakers may benefit from establishing a set of first principles to guide debate and decisions. A set of foundational ideas may provide a touchstone for the potentially complex and heated debates that are likely to follow. Such a set of guiding statements might start with the commitment that all policy decisions should be made with the best interests of students in mind, and it may include ideas such as these that were established by the International Association for K-12 Online Learning (iNACOL), or those of the Trujillo Commission, which was established to assist policymakers in Colorado to respond to the state's audit of online schools. Quality online learning policy should:

- Begin with the premise that public education should include a variety of high quality learning options, including online learning

- Include both full-time and supplemental online opportunities

- Provide equal access to all students

- Facilitate a range of online learning opportunities

- Provide fair and sensible funding that allows online learning to expand with demand while maintaining state-of-the-art quality

- Provide reasonable oversight and reporting requirements to ensure quality

- Allow for thoughtful teacher licensure requirements so that students benefit from the best online instructors

- Advocate for valid research to ensure effective, research-based instructional and curricular practices

- Seek a balance between simultaneously providing oversight and ensuring a responsive ongoing policy refinement process to allow policy development to keep pace with emerging virtual learning developments

- Maintain teachers as the expert leaders and facilitators of learning, giving them responsibility for overseeing and managing student learning, and for ensuring academic progress and accountability

- Encourage and facilitate the involvement of parents, guardians, and mentors to increase accountability and support in the learning process

- Require high quality curricula, aligned with state and applicable district standards

- Address existing policies that do not fit or that hinder online learning progress and accessibility, including removing enrollment caps and artificial limits restricting student access to online courses

- Allow learning to transcend time- and place-related requirements and focus, instead, on successful student achievement

- Look for opportunities to address policy issues that may provide improvement or address gaps across all modes of education delivery[6]

Policymakers may add to the above list, eliminating or changing wording or emphasis. The list is not definitive, but creating a set of principles is a critically important first step.

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[6] These statements are adapted from the first principles identified by the Trujillo Commission, whose report is available at http://inacol.org/resources/docs/TrujilloCommissionOnlineEducationFinalReport-2-15-2007.pdf, and from Every Student's Right to Online Learning Opportunity, published by the Advocacy and Issues Committee of the International Association for K-12 Online Learning.

Legislative and Policy Themes

Once the first principles are established, they can be applied to the many issues that policymakers must address. This section divides online learning policy issues into five broad areas: funding, locus of control, operations and oversight, evaluation and reporting, and "other," including "policies to avoid." Most of the policies discussed below are state-level. The state is the key policy level for online learning because there is little national legislation that affects online learning (beyond the ways in which No Child Left Behind impacts all public schools), and the majority of large and influential online programs operate above a district level.

Specific examples are provided for some of the policy issues, highlighting decisions made by some states in each area of policy. These examples are not comprehensive but are meant to be illustrative.

Funding

Funding is the single most important policy issue in online learning. Online schools are full-service public schools with many of the same costs as their brick-and-mortar counterparts, including salaries, benefits, initial training, and ongoing staff development. Online programs do not incur the same level of facilities and transportation costs as traditional districts, but they have significant technological components, with associated costs for hardware, bandwidth, and the like, which are critical to supporting the teaching and learning process. In addition, other costs, such as teacher travel for face-to-face training, telephone technology, and technical support, must be considered. Funding for online schools and, indeed for all learning, should facilitate quality learning while allowing for ongoing investment in research and innovation. A few states have elements of funding models that might be used by other states as a starting point in crafting their own funding models, including Florida, Idaho, Ohio, and Wyoming.

Few studies have compared the cost of online schools to traditional schools; those that have been done suggest that the cost of educating a student in an online environment is about the same as educating the same student in a brick-and-mortar school. Key considerations in funding of online programs include:

Amount of funding

Online schools should be funded within the range of brick-and-mortar school operating costs in each state. The study by school finance consulting group Augenblick, Palaich and Associates concluded, "The operating costs of online programs are about the same as the operating costs of a regular brick-and-mortar school."[7]

For online schools that draw students from across the entire state, some argue that a single online base funding level (not including additional funding for special needs and similar student-specific situations) should be established within the range of brick-and-mortar school operating costs. Some states are considering a similar approach for all public schools, while others counter that this standardized approach doesn't properly account for the costs of educating students from diverse communities.

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[7] Costs and Funding of Virtual Schools, Augenblick, Palaich and Associates, Inc. 2006

Kansas policy states, "...for each school year that a school district has a virtual school, the district is entitled to Virtual School State Aid. Virtual School State Aid is calculated by multiplying the number of full-time equivalent pupils enrolled in virtual school times 105.0 percent of the unweighted Base State Aid per Pupil (BSAPP)."*

* http://skyways.lib.ks.us/ksleg/KLRD/2008ConfCommRpts/ccrb669_001_23.pdf

Accounting and Reporting

Accounting and reporting should be freed from seat time and census dates. A common alternative is to fund based on equivalencies (i.e., the online course is deemed to be equivalent to the face-to-face course and is funded at the same level.)

States that fund schools based on one or two census dates should consider using an alternative for online schools, to avoid the possibility of a student switching districts right before or after the count day and creating a situation where the district receiving funding for the student is not the district that does most of the teaching of that student. In fact, the census date approach is a prime example of a policy that bases funding on a variable completely unrelated to student achievement and therefore should be reconsidered for all modes of education—not just for online learning. As it is, funding is provided in relation to something that has no bearing whatsoever on student achievement.

An innovative option is to fund students based on outcomes. States that fund based on successful completion find that having defined benchmarks or milestones for incremental completion (for example, 50% and 100% complete) provides a more rational and predictable approach than "all or nothing."

The Florida Virtual School (FLVS) is an example of outcome-based funding, as the school does not receive funding until students successfully complete each course segment. Julie Young, FLVS CEO, notes,

> "In our early days of development, we were highly influenced by a 1992 SCANS report [Secretary's Commission on Achieving Necessary Skills]. One quote we've returned to over and again says, 'In our current system, time is the constant and achievement the variable. We have it backwards. Achievement should be the constant and time the variable.' As we continue to evolve, we keep this central focus on achievement as our guidepost for development."

In Michigan, the State Superintendent has provided 14 public school districts and public school academies (out of 838) with "seat time waivers" that allow a certain portion of the student population to take online courses in a "full time" status.*

* http://www.michigan.gov/documents/mde/PA_212_of_2008_-_cyber_school_report_both_documents_v2_270919_7.pdf

Student Participation Requirements

If a state shifts funding to be based on outcomes, the issue of non-participation or truancy may come up because public schools are expected to know the status of their students. State law may set requirements for communications from students in order to make sure that they are actively participating in the online school.

EXAMPLES FROM THE STATES

Under Wisconsin's 222 (passed in 2008), "if a student fails to respond appropriately to a school assignment or directive from instructional staff within five school days, the virtual school must notify the student's parent or guardian. If a student fails to participate three times in a semester, he or she may be transferred to another school or program."*

* Wisconsin Legislative Reference Bureau, Legislative Brief 08–6 May 2008 VIRTUAL CHARTER SCHOOLS

From Line-Item to Sustainable

State-led supplemental programs, which have traditionally been funded through line-item state appropriations, should be shifted to a sustainable funding source. A study by the Southern Regional Education Board estimated that a state virtual school needs $4 million in funding for start-up and operational costs to serve 5,000 one-semester enrollments.[8] While the state legislature may find it cost-effective to fund start-up and early operating costs through appropriations, ultimately these programs can only meet growing demand if they are integrated into the regular per-pupil funding formula on a fractional or formula basis.[9]

EXAMPLES FROM THE STATES

The 2007 Joint Finance and Appropriations Committee of the Idaho Legislature approved a funding formula that allows the Idaho Digital Learning Academy (IDLA) to grow, predict, and plan for the future. IDLA is funded by a per-enrollment formula and a base appropriation, then adds in course registration fees and an additional base amount for every 5,000 course registrations. IDLA's funding is based on this formula, so it is automatically funded from the dollars appropriated for public schools, but it does not compete for per pupil funding.

Locus of Control

Locus of control entails at least two issues:

1. At what level (district, state, charter, other) is online learning provided?
2. Can students and parents choose both supplemental and full-time online learning options?

Full-time online schools are often charter schools, but in some states such as Washington and Colorado, multi-district programs that are not charters offer a full online course load. Supplemental

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[8] Southern Regional Education Board, 2006, Cost Guidelines for State Virtual Schools
[9] See for example the 2001 study by The CNA Corporation, Who Should Fund Virtual Schools, available at http://www.cna.org/documents/VirtualSchools.pdf

12   Policy and Funding Frameworks for Online Learning

programs are often a state virtual school (such as in Michigan, Kentucky, Georgia, Florida, and other states), but in a few states, districts offer supplemental programs. Regardless of the types of entities offering online opportunities, the key considerations are:

1. Are students informed about online courses and schools?

2. Do students have the right to choose an online course or school, regardless of where they live? Alternatively, does the student's home district have the right to tell a student that the online school or course is not available to him or her?

States with the most growth in online learning are those that allow students to cross district lines and enroll in the state virtual school or a full-time online school operated by another district or charter school. This open enrollment allows online schools to achieve economy of scale and, most importantly, provides students the opportunity to access the school option that best meets their needs. Relatively few districts are large enough to sustain a full-time online school on their own at this point.

EXAMPLES FROM THE STATES

The legislatures in Colorado (in 2007) and Wisconsin (in 2008) affirmed their support of online programs, including full-time programs that draw students from across the state, in laws that were passed after 1) a state audit of online programs (in Colorado) and 2) a lawsuit that resulted in a judgment that would have closed online schools in Wisconsin, if the legislature had not intervened by updating legislative language. In Colorado, funding for most students in physical schools varies by district, but all online students are funded at the same level (the state minimum). State education agencies and legislatures in Minnesota, Kansas, Pennsylvania, and Washington, among other states—all of which have substantial numbers of full-time online schools—have policies that support these schools. In Florida, students across the state enjoy a statutory right to choose online courses when these courses best meet the learning need. Florida K-20 Education Code (s.1002.20) states: "Parents of public school students may seek whatever public school choice options that are applicable to their students and are available… [including]… the Florida Virtual School."

Operations and Oversight

While operations of online schools is not a primary policy issue, it can become one if states create operational requirements for online schools, as some have done, that go beyond standard requirements for all public schools, such as the requirement that online courses meet state content standards, and that teachers be licensed. Online school operations should not be subject to state micromanagement that threatens flexibility and innovation, but provisions specific to online learning may be appropriate.

In addition to operational issues, online schools often challenge states' oversight mechanisms. While full-time online schools are usually subject to the same provisions under NCLB as all public schools, the ways in which these provisions are enacted may not easily account for online schools. There are a number of issues related to oversight that need to be addressed. Following is an explanation of some key operational issues.

Professional Development

Teachers often say that teaching online is very different from teaching in a physical classroom, and many online schools (but not many pre-service programs) provide specific professional development to help teachers make the transition. At the most basic level, teachers benefit tremendously from training that provides the necessary technical skills for communicating online, but more importantly they benefit from specific training in online pedagogy. Some states now mandate that online schools offer and/or require professional development in online teaching strategies.

EXAMPLES FROM THE STATES

Wisconsin's 2008 online learning bill requires that as of July 1, 2010, public or charter online teachers must have completed at least 30 hours of professional development specific to online teaching. South Dakota requires that distance learning instructional staff must annually demonstrate proficiency in instruction using the distance learning provider's delivery system. Hawaii's 2008 online learning law calls for developing and establishing "a mentoring and training program for online teachers, collaborating with the University of Hawaii Department of Educational Technology as needed." The law also calls for the establishment of "an online training program to increase the number of highly qualified teachers, administrators, and paraprofessionals."

Teaching Across Boundaries

Many policymakers recognize that online learning offers the opportunity to bring highly-qualified teachers to rural areas and other underserved regions within their states; this is one of the drivers behind the proliferation of state virtual schools. However, very few states have made the next logical observation that online teachers should not be restricted to teaching within state lines. While state content standards vary in some subjects, for many topics such as algebra there is simply not much variation by state. States could easily balance the supply of highly qualified teachers by creating reciprocity with other states—recognizing each other's certification of qualified online teachers. The result would be increased access for students who otherwise might not be able to easily take a course in a subject such as physics, chemistry, or a foreign language—online or otherwise. Although teacher reciprocity is found in some form in 37 states,[10] in most cases it requires that teachers take steps to obtain a license in the state in which they wish to teach and therefore does not properly address the needs of online teachers and the students they would serve.

EXAMPLES FROM THE STATES

Oklahoma is one of the few states in which teachers of online courses may be certified in another state, or may be a faculty member at a postsecondary institution. In North Dakota, "all teachers… meet or exceed the qualifications and licensure requirements placed on the teachers by the state in which the course originates."*

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* North Dakota House Bill 1491, passed in 2007

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[10] Online Learning Policy and Practice Survey: A Survey of the States from Center for Digital Education

Accreditation

Because online learning programs vary so widely, accrediting issues vary as well. For example, most state virtual schools do not fit the definition of actual schools, so the ways in which they can or should be accredited differ. In other cases, full-time online schools theoretically must follow the same accreditation practices as any other public school. As noted earlier, however, audits reveal that states and districts have been guilty of not following their own accreditation procedures when it comes to online learning opportunities.

Over the years, standards that are specific to accrediting online programs have been developed, though their application is not necessarily widespread or consistent. For those schools seeking an accreditation, the Commission on International Trans-Regional Accreditation (CITA) provides a formal process for doing so. Their standards address issues such as:

1. Vision and Purpose
2. Governance and Leadership
3. Teaching and Learning
4. Documentation and Using Results
5. Resources and Support Systems
6. Stakeholder Communication and Relationships
7. Commitment to Continuous Improvement

Clearly, these issues apply to any program of quality and are the same issues any accrediting agency might address. However, the language of the CITA accreditation process makes room for the specific needs of online programs.

Quality standards have been developed for K-12 online courses, teaching and programs. The International Association for K-12 Online Learning (iNACOL) and the Southern Regional Education Board (SREB) have both developed measurement tools to help administrators assess operational issues ranging from the quality of specific courses, teacher performance, professional development offerings and program quality. Individual states often have their own guidelines as well, such as Virginia where online courses are required to be "equivalent" to a course at a local school, taught by a licensed (or eligible and supervised) teacher, and approved by the school board.

EXAMPLES FROM THE STATES

Kansas uses a state-controlled registration system that requires all online programs to register with the state, utilize a desktop audit, and submit to annual reporting measures in order to claim FTE funding for the students. In addition, Kansas includes site visits, personnel, and program requirements. Kansas has gone to great lengths to create a clear definition of a virtual school and to provide specific guidelines for their governance.

Washington includes governance for online learning within their policies for all "alternative learning experience" (ALE) programs. All ALE programs must be state accredited and, in order to receive FTE funding, must meet annual reporting requirements.

In Florida, the Florida Virtual School (FLVS) set its own standards early on and voluntarily sought, and was awarded, accreditation through CITA and the Southern Association of Colleges and Schools. FLVS also contracts with an external firm to conduct its own annual evaluations, and the program has submitted to other evaluations, such as a tax watchdog organization that conducted an audit of FLVS in order to assess the value of the program to Florida taxpayers, which concluded the virtual school was a better use of taxpayer dollars, providing academic results and a new model of accountability.

Senate Bill 215 in Colorado introduced new oversight measures, particularly for multi-district programs, which now must be state certified. The newly created Unit of Online Education, which was formed in 2007, created new statutory standards that now provide the foundation for the online accreditation process in the state. In Pennsylvania online learning is conducted primarily through charter schools, which are overseen by the Pennsylvania Department of Education's System of Cyber Charter Review.

Evaluation and Reporting

Typical Measurements and Data Points

Measurement of program effectiveness, like everything else in online learning, varies across the nation, not only in how evaluations are conducted but also in what data are being measured. Generally, evaluation and reporting focus on measuring student achievement as well as program effectiveness—including teaching, curriculum, administration, and support.

Full-time online schools can measure student achievement in a fairly straightforward manner because they are responsible for their students' state assessment scores. Part-time or supplemental programs don't typically administer state-mandated achievement tests; thus, the responsibility lies with the local district not only to administer the test, but also to validate and accept the credit being provided by the virtual program. For this reason, supplemental programs typically measure achievement through course completions, embedded final exams within the course, and built-in internal and/or external feedback mechanisms, such as parent and student surveys.

Possibilities and Promise

While early practitioners of online learning understood fairly quickly the data advantages of the online environment, newcomers may just be catching on to the possibilities such real-time data gathering affords. Because online learning is almost entirely digital, we can now capture remarkably granular bits of information that tell us how and when students are succeeding or struggling in their coursework—right down to single components within a given lesson.

By paying attention to this kind of data, program managers can make quick and very specific intervention decisions. Impressively specific pieces of real-time data can be captured, such as time-, day-, and duration-specific login information, time to complete assignments, scores, online participation, and even a digital record of the students' work, comments to and from the teacher, and captured discussions during online collaborative sessions such as forums or web conferencing. Having immediate access to this kind of information is a potential goldmine for evaluators, who,

without this kind of data, had to make instructional, curricular and programmatic recommendations based on lagging data, such as last year's achievement scores. Achievement scores, while critical and certainly useful for ongoing development and decision making, don't tell the whole story. With online learning, students, teachers, and program administrators are leaving digital footprints on practically every activity they do in association with the program. Administrators, teachers, and developers are delving into the rich availability of this kind of immediate data to harness it for dynamic decision making, while researchers and evaluators can reach into far more specific areas of the teaching and learning process through the window afforded by such compelling data.

For example, because online schools tend to use the same course for numerous teachers, whether developed in-house or purchased from a provider, it is now possible for real apples-to-apples comparisons among teaching staff. While some may see this as intimidating, there are actually very positive outcomes when the data is used proactively. If, for instance, a team of teachers, using the same online biology course, is tracked, it is soon easy to distinguish genuine areas of strength and weakness. The ramifications for peer coaching, teaming, and informed professional development are all positive—and online teachers often find they benefit from the opportunity to receive such remarkably specific input to help them grow in their profession.

Course developers likewise benefit from such specific data gathering. If the data show that all students typically struggle with a given lesson or section of content, developers know with amazing specificity the areas where they need to re-develop, provide additional instructional tools, such as interactives, or work to clarify the directions.

The beauty of using the real-time data afforded by the online learning environment is that it facilitates the kind of rapid evaluation process necessary to a quickly emerging field of teaching and learning. The key for program administrators is to ensure that measurement tools are in place to capture data related to the specific goals of the program. If, for instance, the goal of the program is to increase opportunities for rural students, there must obviously be a way to ensure that the growth of rural student participation is reaching the percentage goals set by leadership.

Besides developing their own internal and/or external evaluation measures, virtual schools across the nation are evaluated by their states or districts in numerous ways. The state audits in Kansas, Colorado, Arizona, and Idaho, and others mentioned earlier, have provided input that continues to inform policy development. More states are developing specific guidelines for state-, district-, and charter-led virtual initiatives. Independent evaluations, such as the TaxWatch study in Florida,[11] have likewise provided useful third-party insights. The trick lies in providing enough guidelines to ensure quality and hold programs accountable to standards, while also providing enough leeway for individual programs to use the dynamic data available to them to make the best decisions for their specific student demographics. The move by some states towards measuring achievement on year-to-year growth models is welcome to many online program administrators who not only have the capability of tracking such data, but also see the value it represents in terms of providing a clearer picture of student achievement.

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[11] Florida TaxWatch Center for Educational Performance and Accountability, Final Report: A Comprehensive Assessment of Florida Virtual School, available at http://www.floridataxwatch.org/resources/pdf/110507FinalReportFLVS.pdf

Policies to Avoid

States are laboratories of democracy, taking 50 different approaches to online learning from which we can pick and choose the best approaches. Clearly, if some policies are beneficial for increasing student opportunities and outcomes, others are not. Some ideas that have been tried by one or more states, and have proven to be restrictive or detrimental, include:

- **Requiring on-site or face-to-face instruction, thereby not allowing fully online schools.** There is evidence that online learning works as well or better than face-to-face instruction.[12] As online learning evolves in practice and is accepted as a viable option, there is no reason to limit access or create arbitrary attendance requirements that create barriers and negatively impact students and families.

- **Mandating enrollment cap limits on the number or type of students who can enroll in online schools or online courses.** This approach makes little logical sense—if online learning is beneficial for the first 5,000 students who choose it, why deny it to the next student? Alternatively, some states have created "pilot" programs that allow for a limited number of online schools under limited circumstances. In some states, these programs languish in pilot status for years. Pilot programs may have made sense a decade ago when online schools were in their infancy, but with more than a decade of experience and results to draw upon, and with demand growing annually, pilot status does not make sense and restricts opportunities.

- **Setting funding levels for online students well below funding of other students in the state.** Some states may believe they can save money through their online schools by arbitrarily setting the funding level below the state average. However, reducing funding for online students below the state minimum is unsupported by any cost studies or other evidence. It threatens quality and innovation in content, delivery, human capital and technology and prevents planning for a sustainable online future. It also penalizes students who choose online schools by making it highly likely that their educational experience is substandard. Low funding forces online schools to cut or restrict teachers, academic programs, technology, and student support services.

Next Generation Legislation

With so many existing online learning policy approaches, it is impossible to suggest one-size-fits-all legislation. However, as legislators consider creating or amending education policy, they should focus on adequate funding, providing options to students, and creating policy that is not overly prescriptive. Key input measures, such as teacher credentialing, state standards alignment, and reporting of measures like completion rates and response times, are likely to hold true no matter the technology being used, or the balance of online, offline, or face-to-face instruction. Creating requirements outside of these few inputs, however, often threatens innovation by mandating an approach made obsolete by changes in educational practices. Next generation policymaking may include some of the following elements:

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[12] US Department of Education, Evaluation of Evidence-Based Practices in Online Learning: A Meta-Analysis and Review of Online Learning Studies, retrieved July 8, 2009, http://www.ed.gov/rschstat/eval/tech/evidence-based-practices/finalreport.pdf

1. **Define online schools and programs in a way that clarifies which are covered.**

   Consider the differences between full-time and supplemental programs, and between single-district and multi-district programs.

2. **Provide adequate and sustainable funding that entails the following elements:**
   a. Fund a state-led, supplemental program that will benefit from economies of scale in offering online courses to districts across the state.
   b. Fund full-time schools at the same operational cost level, not including capital costs, as other schools in the state.
   c. Allow students to choose an online school that meets their needs, and allow funding to follow the student.

3. **Provide standards and monitoring expectations for online programs and/or program authorizers.**

   All online programs and schools should be authorized by and answer to an oversight body with adequate knowledge of and experience in online learning to ensure that students are benefitting from a high-quality online experience. This oversight entity might also develop key definitions that would apply across online programs, such as successful course completion, enrollment, attendance, and at-risk, and create and impose penalties for programs that do not meet requirements.

4. **Create reporting requirements for online schools.**

   Many states have little or no data on how many students are taking one or more online courses, how many online programs exist, and how those programs are operating. A few forward-looking states recognize that in order to maintain any oversight role they need to benchmark quality and collect data. A mechanism to track online programs and students is an apparent first-level policy requirement that a surprising number of states have yet to put into place.

   Reporting and requirements work closely together, of course, and include oversight, data collection, and reporting. Each requires a similar set of data and processes that might include:

   - Curriculum and assessment
   - Supervising, evaluating, and training teachers
   - Attendance and activity tracking in a course
   - Communication and teacher response times
   - Student support
   - Awarding credit
   - Funding
   - Participation in state assessments
   - Accessibility and provision of special education services

The state's approach to these policies should seek to find a balance between oversight and leaving room for flexibility and innovation, while remembering that the overarching method of full-time online program oversight should be the same as all other public schools.

Conclusion: The role of online policy development in larger reform efforts

Online learning is clearly here to stay. It has spread rapidly throughout the country—and, indeed, throughout the world—as educators, parents, and policymakers have recognized the many ways in which it can increase educational achievement and improve educational outcomes. Students are increasingly choosing online learning options, for many of the same reasons that they choose to socialize, find information, listen to music, or watch videos online—because Internet-based options are often the best and most convenient for them.

Online learning may also be one of the truly transformative influences on all of education, because many online policy issues cannot be easily addressed without looking at education as a whole. Examples of these types of issues include:

- Funding based on educational attainment instead of seat time
- Student progression based on outcomes instead of social promotion
- Enhanced use of data throughout education
- Move to cross-curricular mastery of benchmarks vs. siloed mastery of standards, course by course
- More effective use of education's essential "human capital"—especially the development and deployment of excellent teachers

Ideally, the continuing evolution of high-quality but diverse online learning programs, together with development of thoughtful state policies, provides a laboratory to explore issues that benefit students in every learning environment.

The many intricate policy details and questions can be confusing, and certainly challenging to understand and explain. In fact, even when you find something that works in one state, there is no guarantee it will work everywhere. With so much local control and without national education standards, perhaps the best approach is to agree on promising frameworks for creating policy, and then leave it to states and districts to create policy specific to their needs within those frameworks.

There is, however, a simple litmus test for evaluating online learning policy. Good policy answers two key questions affirmatively:

- Does the policy hold promise for increasing student educational **opportunities**?
- Does the policy hold promise for improving student educational **outcomes**?

If the answer to both questions is yes, the policy is likely to be beneficial.