

CC. NONCLASSROOM-BASED INSTRUCTION/INDEPENDENT STUDY

If ADA was reported by the charter school to the CDE as generated through nonclassroom-based instruction (independent study), or was reported as generated through classroom-based instruction but was not generated in compliance with all of the conditions set forth in Section BB, perform the following procedures:

1. Determine whether the governing body of the charter school had adopted written policies for independent study as required by Education Code section 51747. If it had not, any reported ADA generated through independent study is not eligible for apportionment. If the required policies were in place, determine whether any reported ADA was generated before the written policies were adopted. Any reported ADA generated through independent study before the written policies were adopted is not eligible for apportionment.
2. Verify the charter school's independent study ratio calculation, made pursuant to title 5, California Code of Regulations, section 11704, of ineligible ADA, if any, generated through independent study.
3. Verify that the documentation used by the charter school to summarize monthly attendance provides accurate information. If the charter school had multiple sites providing independent study, select a sample of schoolsites that is representative of the charter school's grade spans (elementary, middle, and high schools) and sufficient in size to allow the auditor to draw a reasonable conclusion with respect to the charter school's compliance with independent study requirements. Perform the following procedures:
 - a. Determine the total number of days of attendance reported for each site in the sample that resulted from attendance by pupils while engaged in independent study. Reconcile the monthly totals (days of apportionment attendance) on the site's attendance summary to the summary maintained by the charter school for the P2 attendance report.

CHARTER SCHOOLS

Workpaper **Auditor**
Reference **Initials**

- b. Select a test month in the P2 attendance reporting period. Verify the mathematical accuracy of the monthly report, or its nearest equivalent if no monthly report is prepared, and trace the totals to the site's attendance summary.
 - c. Verify that a certificated employee of the charter school, as defined by title 5, California Code of Regulations, section 11700.1, coordinated, evaluated, and provided general supervision (as that term is defined in title 5, California Code of Regulations, section 11700(b)), of each pupil's independent study, as required by Education Code section 51747.5(a).
 - d. Select a representative sample of teachers. Verify the mathematical accuracy of the teachers' attendance records of pupil attendance. Trace the monthly totals from the monthly report to the attendance records.
4. From the attendance records, select a representative sample of the pupils for whom ADA generated through independent study was claimed, including pupils on intermittent ("short-term") independent study, if the charter school offered that option, and perform the following procedures:
- a. Determine each pupil's county of residence at the time of commencing independent study and verify that it is the county in which the apportionment claim is reported or a contiguous county within California.
 - b. Determine whether mailing addresses or other evidence of residency changed during the time the pupils were in independent study and, if so, whether each pupil remained a resident of the same or a contiguous county within California.
 - c. Verify that, on each day for which a pupil's attendance was reported, the pupil engaged in an educational activity or activities required of him or her by the charter school.
 - d. Verify that each day of each pupil's attendance included in calculations of ADA took place on one of the charter school's schooldays.

- e. Verify that a total of not more than one day of attendance was recorded for each pupil for any calendar day on which school was in session.
- f. Verify that a written agreement exists for each pupil.
- g. Verify that every written agreement contained all the elements required by Education Code section 51747(c):
 - 1) The manner, time, frequency, and place for submitting a pupil's assignments and for reporting his or her progress
 - 2) The objectives and methods of study (pupil activities selected by the supervising teacher as the means to reach the educational objectives set forth in the written agreement) for the pupil's work
 - 3) The methods utilized to evaluate that work (any specified procedure through which a certificated teacher personally assesses the extent to which achievement of the pupils meets the objectives set forth in the written assignment)
 - 4) The specific resources, including materials and personnel, to be made available to the pupils (resources reasonably necessary to the achievement of the objectives in the written agreement, not to exclude resources normally available to all pupils on the same terms as the terms on which they are normally available to all pupils)
 - 5) A statement of the policies adopted pursuant to subdivisions (a) and (b) of Education Code section 51747:
 - A) The maximum length of time allowed between the assignment and the completion of a pupil's assigned work; and
 - B) The number of assignments a pupil may miss before there must be an evaluation of whether it is in the pupil's best interests to continue in independent study
 - 6) The duration of the independent study agreement, including the beginning and ending dates for the pupil's participation in

independent study under the agreement, with no agreement being longer than one school year

7) A statement of the number of course credits or, for the elementary grades, other measures of academic accomplishment appropriate to the agreement, to be earned by the pupil upon completion

8) A statement in each independent study agreement that independent study is an optional educational alternative in which no pupil may be required to participate

9) Signatures, affixed prior to the commencement of independent study, by:

A) The pupil;

B) The pupil's parent, legal guardian, or caregiver as that term is used in Family Code section 6550 and following, if the pupil was less than 18 years of age;

C) The certificated employee who was designated as having responsibility for the general supervision of the pupil's independent study; and

D) All other persons, if any, who had direct responsibility for providing assistance to the pupil.

h. Verify that no days of attendance were reported for dates prior to the signing of the agreement by all parties.

i. Verify that pupil work samples have been retained in the file.

5. If any inappropriately reported units of ADA were identified through the foregoing audit procedures, state in a finding such number(s) of units of ADA by grade span and estimate their dollar value. If there are any ungraded units of ADA, then proportionately allocate the disallowance among the grade spans.