

To Whom It May Concern
June 21, 2017

Opposition Letter to AB 318

The California Consortium for Independent Study (CCIS) is a professional statewide organization which supports and promotes the interests of teachers, counselors, paraprofessionals and administrators working in K-adult independent study. The organization is celebrating its 40th year of operation this year. CCIS represents over 300 California schools and programs and over 200,000 learners.

Assembly Bill 318

AB318 is an effort to require a mandatory weekly meeting (face to face or visual means) with independent study students and their teachers to secure or ensure the welfare of the student. The bill provides for an exception from a weekly meeting with either a letter from the parent or a principal/designee approval for justifiable reasons. The bill now also withholds school funding for non-compliance.

Independent Study Rules and Regulations currently in place

- EC section 51747(a) requires a maximum length of time that can elapse between when an assignment is made and when it must be complete.
- EC Section 51747(b) states the number of missed assignments allowed before a written evaluation of continued enrollment must be made to determine whether independent study is the best placement for the student. This written evaluation must be kept for three years and forwarded to any school the student may transfer to.
- EC Section 51747 (c)(1) requires the manner, time, frequency, and place for submitting the pupil's assignments and reporting progress.
- Independent Study Master Agreements must also include the statement that no student can be made to enroll in an Independent Study program and that it is voluntary.
- All teachers and school employees are mandated reporters and can call local authorities for a well check on any students.
- Mandated child abuse awareness training.

The above requirements are in place to ensure that the family, the student, and the teacher all believe the student is in a successful placement. If any party does not concur, the student will be withdrawn from the program.

Independent Study Programs

For forty years, independent study programs have been built on the codes and regulations in place and designed around their program population and program needs.

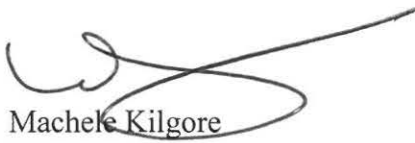
- Programs across the state have become robust offering a variety of social and support programs each week.
- Art and cultural shows, classes, workshops, performances, clubs, science labs, tutorial groups, field trips, etc. are a part of many programs now.

- Other programs require teachers travel to meet rural families and spend 60- 90 minutes a week per family.
- UC approved courses require specific teacher availability in order for courses to be UC approved.

Impact Concerns of AB 318 on Independent Study Programs

- If weekly meetings are required, and there is a format to request excused absences, the audit implications would be an added burden on every teacher. Each student file would need documentation of meeting time, format, or include dated forms approved by the principal for each missed meeting.
- If a teacher with a roster of 25-35 students was required to meet weekly with each student, and have a meaningful and supportive meeting (30 – 60 minutes) the program would no longer be able to offer enrichment opportunities.
- Teachers in programs who travel to meet students would need to have smaller rosters to manage a weekly meeting with all students. This impacts a program with increased staffing and financial burdens.
- K-6, 7-8, 9-12 grades all have different operational opportunities that impact a weekly required meeting with their supervising teacher.
- If a teacher is expected to provide welfare checks weekly with their student roster, what would be the liability of missing a meeting and something happening to the student?
- Many students who come to Independent Study as actors, athletes, musicians, for travel flexibility, medically fragile, emotional issues, need to work to support their family, etc. would not be able to meet on a weekly basis.
- Students who need the flexibility to work with a specific course teacher (e.g. math or science) for academic support would also still need to work around a meeting with their supervising teacher- this impacts parent's schedules and student and staff schedules.
- Many Independent Study programs offer weekly classes, labs, support, remediation, electives etc. If a teacher is required to meet with their roster of students on a weekly basis, the only way to continue the current program would be to increase staff.

Thank you for your review and consideration of my opposition to AB 318 on behalf of the Independent Study programs and students across the state of California.



Machele Kilgore
CCIS Executive Director