

PUBLIC COMMENT FOR BOARD RULE R277-726

Updated December 21, 2020

From: Nan Ault <nan.ault@nsanpete.org>
Sent: Sunday, December 20, 2020 8:31:55 PM
To: Board Rule Comments <rule.comments@schools.utah.gov>
Subject: Public Hearing

I support all changes to R277-726 be put on hold until a workgroup/committee can be formed to examine this rule and online learning in Utah.

Thank you,

Nan Ault

Superintendent

North Sanpete School District

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Superintendent

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"Children are apt to live up to what you believe in them."

From: Mike Liechty <Mike.Liechty@ccsdut.org>
Sent: Monday, December 21, 2020 3:33:37 PM
To: Board Rule Comments <rule.comments@schools.utah.gov>
Subject: Comments Regarding R277-726-5

R277-726-5 LEA Requirements and Responsibilities

(8) and (9) requires that a school create a school within a school to provide for online learning. Who now has the responsibility to monitor/help these students? It's not the school's course. They can't be left alone. They are not in a regular classroom. The labs and resources are already being used by the attending students. If a student chooses to take an online class, that's fine. But not to add an additional burden to an already overloaded school.

Suggestion: Take online courses at home at the beginning of the school day or at the end of the school day. Transportation is the responsibility of the parent(s) making the decision.

Taking an online course at the school during the school day is telling every teacher and administrator that they have nothing of value to offer the student within the current schedule. Wrong message.

December 21, 2020

Dear Hearing Committee:

I am writing to address concerns with Rule R277-726. I appreciate your willingness to hold a hearing, and offer the following written comments, prior to the hearing.

My major area of concern is found in R277-726-5 item number 9, "A primary school of enrollment shall provide participating students access to facilities for the student to participate in an online course during the regular school day..." I find this problematic in many ways I will briefly address some of the concerns:

1. There is no stipulation in the rule regarding a maximum number of students that may take advantage of this provision. If the numbers are relatively low, a school may be able to accommodate the students, as participation numbers increase, the accommodation will become increasingly difficult.
2. In many high schools, there is neither physical space nor staff supervision available to accommodate this request. The most common response to this concern has been: (1) "Put the students in a library or computer lab and let existing staff accommodate them." This may work if it is one or two students, it becomes increasingly difficult as the numbers increase. However, even if it is one or two students it takes time away from the face to face students who are involved in learning activities in the respective venues. (2) "Allow them to sit in a class with the face to face students." The argument is the same, if it is a few students it could work but as numbers grow it becomes increasingly difficult, and in any scenario it takes teacher time and resources away from the face to face students.
3. We support student/parent rights to access education opportunities outside of our LEA. However, in so doing they are making a choice which involves some natural consequences. It appears that this rule seeks to avoid a natural consequence at the expense (not just WPU funding, but also staff and facility costs) of the LEA.
4. Specific to Rich School District; a majority of the students utilizing the services of the "Statewide Online Education Program" are doing so for a portion of the school day, usually one or two periods in the secondary schools. In a majority of those cases it is an avenue to avoid a particular class or teacher. Physical Education, which is a required course for graduation under State Graduation Requirements, is one of the classes most avoided by enrolling in the SOEP program. I am fine with students having that choice, but not sure it is our responsibility to then provide staff and space to facilitate that choice. I could give similar antidotal examples from other curriculum areas, but the underlying issues are the same; student/parents make a choice to utilize SOEP, to avoid our curriculum offerings, but don't like some of the consequences that accompany that decision.
5. I think this decision should be left up to the LEA, I realize that some are accommodating this request and have found ways to make it work, they should have that prerogative. In other

cases, it becomes very problematic; I do not think Board Rule should mandate compliance. I realize this creates some differences that have to be addressed by USBE, but the answer is relatively simple, in referencing LEA autonomy.

A separate concern is R-277-726-3, item 10:

I have asked multiple times exactly what amount will be “withheld from a student’s primary LEA...” The rule references 53F-4-507(2), but there are different interpretations regarding the statute. I submit there should be clear understanding on the funding formula prior to moving forward.

Again, I appreciate your willingness to seek input relative to this issue. I believe it would be in the best interest of all involved to put all changes specific to R277-726 on hold until a workgroup/committee can be formed to examine the rule and the intended and non-intended consequences it poses.

Regards,

Dale Lamborn

Superintendent Rich School District