Accountability

In K-12 Online Learning Course Access Programs:
Stakeholder Recommendations for Policy and Practice

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Executive Summary

K-12 online learning continues to grow in primary and secondary schools, while educational policy strives to keep up with the ever-changing environment. Specifically in the state of Michigan, a recent statewide analysis of online learning showed that over 76,000 students took at least one virtual course in the 2013-14 school year, accounting for over 319,000 virtual enrollments. During this timeframe, Michigan students who did not take a single virtual course had a pass rate of 89% for their face-to-face courses. In contrast, the more than 76,000 students who took at least one virtual course — most of whom took only a few online courses during the year — passed their face-to-face courses 71% of the time. The pass rate dropped to 57% for the virtual courses these students took. On average, students participating in virtual learning in Michigan tended to perform worse in their face-to-face courses than other students, and their performance in their virtual courses was worse than their performance in their face-to-face courses.¹

The growth in online learning in Michigan is based on a few key policies, including the requirement for K-12 students to have an online learning experience before they graduate. Moreover, the addition of Section 21f of the State School Aid Act in 2013 has strengthened parents’ and students’ ability to request online courses, as it states, “A student enrolled in a district in any of grades 6 to 12 is eligible to enroll in an online course as provided for in this section.”² Along with the passing of 21f came a number of concerns about accountability. This report explores the accountability conversation with key stakeholders in the state of Michigan as part of a fulfillment of the following legislative directive for Michigan Virtual University® (MVU⁰): “Collaborate with key stakeholders to examine district level accountability and teacher effectiveness issues related to online learning under Section 21f and make findings and recommendations publicly available.”³

For this study, key Michigan stakeholders — including representatives from the Michigan Association of School Administrators (MASA), the Michigan Association of Secondary School Principals (MASSP), the Michigan Education Association (MEA), the Michigan Department of Education (MDE), and the Michigan Elementary and Middle School Principals Association (MEMSPA), as well as experts from other course access⁴ states and national organizations were interviewed (see Appendix A for interview protocol). The goals of this study were to better understand the conversations surrounding accountability in K-12 online learning and to make key recommendations for moving the field forward in an informed way.

⁴ Course access states have policies that allow K-12 students to choose from a variety of courses outside of their traditional school where they remain enrolled.
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Stakeholders were in agreement that there should be clear expectations of accountability for everyone involved — the school district, third-party provider, online instructor, teacher of record, mentor of record, parent, and student — and that it was important to consider both inputs and outcomes. Based on the results of the interviews, there were eight general recommendations:

1. Clear Communications of Expectations and Awareness
   - Various stakeholders, including MDE, MEA, MEMSPA, MASA, MASSP, and MVU should work together to inform both districts and course providers about their responsibilities to online students. Additionally, a similar process employed by Texas Virtual School Network (TxVSN) holding districts and online providers accountable via a clear contract that outlines each stakeholder’s rights and responsibilities to the online student might be considered.
   - Via a variety of mechanisms, such as district policies, school handbooks, and websites, school districts should inform parents of options for students to take online courses.
   - School districts should require a signed agreement from parents that acknowledges their rights and responsibilities when their child is enrolled in online courses.
   - School districts and course providers should work together to provide professional development specific to online learning for administrators, teachers, mentors, counselors, and students.
   - Course providers should offer an online learning orientation for students that identifies potential areas where students may need additional support.
   - School districts should familiarize themselves with the iNACOL (International Association for K-12 Online Learning) and Quality Matters (QM) standards specific to quality online programs, online course design, and online teaching and use these standards to evaluate online course provider options.

2. Addition of Student Support Structures
   - School districts should invest in robust mentoring and student support programs for their online students, including formal mentor training.
   - MDE and school districts need to identify and establish non-burdensome processes to document that the mentoring services provided are in line with best practices and minimal expectations.

3. Specific Guidelines for Teacher of Record and Mentor of Record Roles
   - The roles of teachers of record and mentors of record should be clearly identified. Include in these roles the need for consistent monitoring and interaction to assist online students.
   - MDE, MVU and other state-level educational organizations should continue to spread awareness about the importance of accurate data regarding the mentor of record and the teacher of record.
   - School districts should set up quality assurance measures and a training process around the importance of accurate data reporting for online students.
4. Changes to State Reporting Guidelines

- When reporting student course information to the state as part of the Michigan Student Data System (MSDS), it is recommended that schools be required to report the following three additional fields for online enrollments:
  - The name of the district, ISD, or the name of the entity offering the online course in the statewide catalog.
  - The name of the company, organization, or district that is providing the actual content for the online course.
  - The name of the company, organization, or district that is supplying the online instructor for the online course.

- Using the data collected above and elsewhere, the state should make transparent both the number of enrollments served by online course providers as well as student performance for each provider. Where possible, additional information, such as AP exam pass rates, should accompany this information. Consider the MI School Data website as a place to house such information on online providers.

- In addition to having schools report data on online enrollments, the state should explore ways to have online course providers supply similar data directly to the state.

5. Updates to Course Catalog

- As the state develops more comprehensive systems for tracking online providers, require that a link to the state data on each provider be part of the information available to parents and students when choosing online courses.

- Incorporate a small set of course ratings for each course that is completed by students who take the course as well as collect feedback from their parents.

6. Additional Requirement of Online Course Syllabi under Section 21f

- Add language to Section 21f that requires the inclusion of a link to a course alignment document as part of the online course syllabi.

7. Pilot the use of Michigan Interim Assessments for Online Courses as End of Course (EOC) Exams

- The Michigan Legislature should consider funding a pilot that studies the use of Michigan’s Interim Assessments using online courses to provide a course-independent measure of student competency.

8. Updates to Course Review Process

- School districts should enroll in high quality professional training so that all course reviewers use a set of common standards when reviewing courses.

- School districts should encourage third-party providers to obtain independent seals of approval, such as QM certified status, as a quality assurance measure.
Executive Summary

While this study has highlighted many recommendations for Michigan’s accountability for K-12 online learning, the conversation needs to continue. As one stakeholder mentioned, “When thinking about accountability, the difficulty is not just online and blended; it’s the collective advent of shared models and unique models of how students are educated, and what are we going to do differently accountability-wise to make sure the student is learning what he/she needs to learn.”
Introduction

K-12 online learning continues to grow in primary and secondary schools, while educational policy strives to keep up with the ever-changing environment. Specifically in the state of Michigan, a recent statewide analysis of online learning showed that over 76,000 students took at least one virtual course in the 2013-14 school year, accounting for over 319,000 virtual enrollments. During this timeframe, Michigan students who did not take a single virtual course had a pass rate of 89% for their face-to-face courses. In contrast, the more than 76,000 students who took at least one virtual course — most of whom took only a few online courses during the year — passed their face-to-face courses 71% of the time. Their pass rate dropped to 57% for the virtual courses taken. On average, students who participated in virtual learning in Michigan tended to perform worse in their face-to-face courses than other students, and their performance in their virtual courses was worse than their performance in their face-to-face courses.\(^5\)

These general trends are complicated by other factors. For instance, 64% of the virtual enrollments in Michigan came from students in poverty, a higher rate than the overall percentage (48%) of Michigan students living in poverty. In terms of performance, the pass rates for virtual enrollments for students in poverty were 11% lower (53%) than they were for those who were not in poverty (64%). There were also other stark performance differences. Although the average pass rate for virtual enrollments was 57%, the average may be misleading. Close to 50% of the virtual students passed every virtual enrollment they took. In contrast, about 30% of the virtual students failed every virtual enrollment they took. Approximately one in five virtual students had mixed results. Finally, 28% of schools with virtual enrollments had school-wide virtual enrollment pass rates of 90% or more — exceeding the 89% pass rate for all non-virtual students in Michigan. Clearly, there are students and schools that are highly successful with their online programs, but unfortunately, they tend to be more the exception rather than the rule.

The growth in online learning in Michigan is based on a few key policies, including the requirement for K-12 students to have an online learning experience before they graduate. Moreover, the addition of Section 21f of the State School Aid Act in 2013 has strengthened parents’ and students’ ability to request online courses as it states, “A student enrolled in a district in any of grades 6 to 12 is eligible to enroll in an online course as provided for in this section.”\(^6\) Along with the passing of 21f came a number of concerns about accountability. This report explores the accountability conversation with key stakeholders in the state of Michigan as part of a fulfillment of the following legislative directive for MVU: “(xi) Collaborate with key stakeholders to examine district level accountability and teacher effectiveness issues related to online learning under section 21f and make findings and recommendations publicly available.”\(^7\)

For this study, key Michigan stakeholders — including representatives from the Michigan Association of School Administrators (MASA), the Michigan Association of Secondary School Principals (MASSP), the Michigan Education Association (MEA), the Michigan Department of Education (MDE), and the Michigan Elementary and Middle School Principals Association (MEMSPA), as well as experts from other course access states and national organizations — were interviewed (see Appendix A for interview protocol). The goals of this study were to understand better the conversations surrounding accountability in K-12 online learning and to make key recommendations for moving the field forward in an informed way.

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In 2013, Michigan became a course access state with the passing of Section 21f of the State School Aid Act, which allowed eligible students to take up to two courses per academic term as long as the courses were in compliance with a legislatively mandated set of criteria.8 The law requires districts to both allow students to take online courses and pay for the students to take the courses. When Section 21f was passed, there were a couple of concerns from school districts and teachers around the area of accountability.

The first concern was the question of who should be held accountable for the student when the student opted to take an online course from another district, intermediate school district (ISD), or the Michigan Virtual School® (MVS®). Even though the student was taking a course that was provided by a different entity, the primary district was held accountable for the student’s performance when it came to standardized measures that factored into the district’s accountability scorecard and the ability to make adequate yearly progress (AYP). It is safe to say that some districts were quite concerned about the prospects of underperforming on these important measures, especially if it was the result of some other entity educating its students.

A second concern revolved around teacher effectiveness issues and how online teachers would be evaluated. Michigan has had a long standing requirement that a student taking an online course be assigned an on-site mentor. This on-site mentor is an adult employed by the school district whose role is to monitor and support the online student during the course, but the mentor is not assigned teaching responsibilities. In contrast, the teacher of record for the online course is the person responsible for the teaching. In practice, however, many online students are enrolled in teacher-less courses — courses in which there is no online instructor — or in courses where a third-party vendor provides the instructor, but the district does not have the personal identification code (PIC) for this instructor. In such cases, a district typically records the mentor’s PIC both as the mentor of record as well as the teacher of record. Because mentors are being assigned as the teachers of record, many have expressed concerns about the possible repercussions this may have on their teacher effectiveness scores and similarly their prospects for promotion and retention.

An argument that was made by districts amounted to this: if districts were forced to take the funding they received from the state and pay another district to educate the student, then so, too, should the accountability be removed from the primary district and become the responsibility of the providing district. However, such an argument was weakened by a few important factors. First, almost universally, the amount of money districts, ISDs and MVS were charging for the online courses was substantially less than the prorated amount the district received from the state. While it was true that the primary district had to pay another district, the primary district continued to keep a portion of that money in-district. Second, the 21f legislation grants a primary district the ability to block an online enrollment request for a handful of reasons, including the perception that the online course lacks rigor or quality. Thus, the primary district has the ability to help their students select online courses that are of high quality and taught by high quality teachers, alleviating some of the concern about student learning. A final factor is that the district also has the responsibility to provide the on-site mentoring to support and ensure the student is getting a quality learning experience. Taken together (shared funding, course selection, and on-site mentoring) these factors create a strong case that a more optimal end result is to find ways to have shared accountability for online students.

In the spring of 2015, ISDs offered about 50% of the courses in Michigan’s Online Course Catalog. Overwhelmingly, the content for the courses offered by the ISDs came from a third-party provider and used the third-party provider’s teachers. About a third of the courses in the catalog were added by local districts. Similar to ISDs, over 90% of the courses used content provided by third-party providers. However, local districts assigned their own teachers to the courses for about two-thirds of the course titles.

To assist districts, parents, and students in choosing among multiple online course options, all online courses displayed in the statewide catalog contain a rating for each of the 52 iNACOL standards for quality online courses. Along with common syllabi information, student performance data that includes the number of students who enrolled in the online course in each previous year, as well as the number of those enrollments that earned 60% or more of the total course points, is provided.

While the student performance data currently in the catalog provides insight into how well the students perform based on measures internal to the course itself, unfortunately there are no external measures to date that provide an independent perspective on student competency. For instance, unlike other states that have common End of Course Assessments (EOCs), Michigan does not currently implement such assessments. There was an effort made by the Michigan Department of Education (MDE) to create and implement EOC exams (known in Michigan as Interim Assessments), but the funding supporting the effort was discontinued during the same period of time the state was embroiled in the Common Core State Standards adoption discussions. Without an independent measure at the end of the course, some schools fear that the final course grade may be misleading, and they worry that the only way they will find out that this is the case is through the standardized test scores administered by the state. At this stage, however, it is too late to remedy the holes in the student’s understanding, and the school itself may be penalized if it impacts their AYP.

Despite the concerns raised above, stakeholders reported that there are those in the state who have embraced online learning, conveying, “We can do this, and kids should have an online experience before they graduate” and “We’ll train teachers to teach online and help mentors.” At the same time, those same stakeholders acknowledge the following: “You still have a majority (of districts) that want to hide (the online learning option) on the last page of their course description book and try to find reasons to deny the opportunity.” Given these varying cases, what options do stakeholders have to solve the accountability puzzle in K-12 online learning in the state of Michigan? To gain some additional perspective, other course access states were asked to provide their experiences. These states are highlighted in the next section of this report.

Exploring Accountability
Beyond Michigan

Other states with school choice programs or policy have had to grapple with issues of accountability. With state-level school choice, or course access programs, there is significant involvement on the part of the state.\(^{10}\) This often includes a centralized web-based hub that provides families with information on online course choice. Generally, states with school choice programs have a state-approved list of providers from which families can select, and districts should be familiar with online courses as an option for students and communicate this information to families. However, in actual practice, it is unknown whether or not this communication occurs on a regular basis. Funding follows the student when he/she takes an online course, although it may be a portion of the regular FTE amount for traditional, face-to-face courses. Often, funding to the online course provider is contingent upon students’ successful completion of the course.\(^{11}\) The purpose of school choice programs is to increase students’ abilities to take classes beyond the offerings at their local schools. According to Bailey et al. (2014),\(^{12}\) “Course Access programs are intended to provide students with expanded access to educational opportunities by supplementing existing curricular options offered by students’ schools with courses offered by third party providers in online, blended, and/or face-to-face formats (depending on the state)” (p. 7).

States with online school choice programs and/or policy, such as Louisiana, Minnesota, and Texas, are in a unique position to provide examples as to how they have dealt with issues of accountability. Representatives from all three states were interviewed to glean information and recommendations regarding how their school choice program has dealt with aspects of ensuring student success and online course quality as part of accountability.

Louisiana

Louisiana’s Course Choice or Supplemental Course Academy (SCA) program provides Louisiana students with a broad range of virtual, blended, and face-to-face course offerings. Participation in SCA is open to high school and advanced middle school students for academic and career and technical education (CTE) courses, including dual enrollment courses (i.e., courses that students complete for both high school and college credit).

Students are able to enroll in online and hybrid classes from a variety of providers approved by the state. There is a three-part test when considering the approval of all Course Choice courses: (1) whether the course is academically appropriate, (2) whether it is logistically feasible, and (3) whether it keeps students on track for on-time graduation. Providers receive half of the funding upon enrollment and the other half upon successful student completion.\(^{13}\) SCA funds can only be used to pay for an approved course from a state-approved course provider. In addition, based on changes to the original course choice law, Local Education Agencies (LEAs) in Louisiana now control how they expend their Course Choice/SCA funds. This means that district administrators have the final decision-making authority on how funding is spent when selecting among approved courses offered by approved course providers.


Accountability efforts in Louisiana have focused on student success. For supplemental courses, the accountability resides with the local district. To assure quality of online courses, Louisiana has taken a number of steps, including instituting an application process for approval of providers and courses. Within the Department of Education, there is one dedicated staff member as well as part-time employee efforts to monitor online provider quality, register students, and track student performance. In terms of the application process, during the first year of the SCA, there were over 70 course provider applications. However, in the second year, this number dropped to approximately one dozen applicants. This number has continued to decrease during the past two years. Starting in 2015, Louisiana implemented a rolling application process for course providers, eliminating the old policy that offered course providers only a single fall window for applying.

The application review process evaluates course provider background credibility, capacity, and prospects for success with Louisiana students. Applicants that receive a favorable evaluation of their application then present their capabilities and the proposed course content (plus any other data requested, based on the application review) to a three-person interview team. In addition, there is an external expert process review, followed finally by a review conducted by the State Board of Education.

Getting approved as a course provider does not equate to having a course accepted. Once approved, the provider must then put forth the courses they propose offering to Louisiana students for review. The Louisiana Department of Education then evaluates the quality and suitability of each course. Ultimately, the Course Choice Chief Academic Officer has to approve each proposed course. Course providers may add additional courses in future years, especially if they have a positive track record for their first year(s) of implementation, and the courses meet quality standards.

The state retains the right to put course providers on probation and terminate them if it is determined that they are not performing based on the detailed course provider agreement each course provider executes.

Another measure of accountability in the state of Louisiana is the requirement that all students pass EOC exams in algebra I or geometry, English II or III, and biology or United States history in order to graduate. Students are required to earn at least a score of “Fair” indicating that the student has demonstrated the fundamental knowledge and skills needed for the next level of coursework. To be able to graduate, a score of “Fair” or higher must be achieved on three End-of-Course exams, one from each category. These exams are administered three times a year and make up between 15% and 30% of the student’s final grade, as determined by the local school district.

Texas
The Texas Virtual School Network (TxVSN) was created to offer supplemental online course choice as well as fully online options for districts wanting to have a virtual campus. For supplemental courses, TxVSN provides students and districts with a course catalog from which up to three approved online courses per semester may be selected. In general, students must be younger than 21 years of age, must not have graduated from high school, and must be eligible to enroll in a Texas public school. Students can take online courses for credit recovery or initial credit including Advanced Placement and dual credit to be able to meet high school graduation requirements. They can select to complete TxVSN courses during their regular school day or off campus at their own convenience.

In terms of funding, the student’s school district pays the TxVSN for the course, and then the TxVSN in turn pays the course provider. The student is potentially eligible to generate state funding for up to three TxVSN courses per semester, presuming that the student successfully completes the courses. If the three TxVSN courses are taken as part of the student’s normal course load, then the district pays the course costs. A student may take additional TxVSN courses, but the district may decline the course cost. In this situation, the student will cover the cost of the course. For fully online students in younger grades (3-8), the instructional program must be completed such that student progress warrants promotion to the next grade level. Once this requirement is met, the online school earns full average daily attendance and gets full funding, the same as a brick and mortar school would receive. If the student does not advance to the next grade level, the online school gets no funding. For high school, successful completion is on a course-by-course basis. If a student successfully completes three or four TxVSN courses, half-time funding is awarded. If a student successfully takes five or more courses, full-time funding is provided. One TxVSN online course counts as 55 minutes per day per course of instruction. Half-time is equivalent for the funding of two hours of instruction per day, while full-time funding is considered the equivalent allowed for four hours of instruction per day. In either case, it matters if the student successfully completes the course.

With this model in place, it is a requirement of the Commissioner of Education in the State of Texas to ensure quality online programs. Similar to Louisiana, there is an approval process overseen by the Texas Education Agency (TEA) to meet eligibility requirements and to evaluate courses on the basis of three different sets of standards. These include state curriculum standards for regular courses or College Board requirements for AP classes, INACOL standards for quality online courses, and TxVSN accessibility guidelines. While a small but growing number of courses meet all accessibility standards, guidelines and assistance exist for making online courses accessible.

Once course approval is given, one of the unique elements of the process in Texas is that there must be an agreement among entities to be able to provide courses and have students enroll through the TxVSN catalog. If a provider wishes to offer courses, or a district wants to enroll students, each must sign an agreement that specifies their rights and responsibilities. For providers, they must certify that they have the legal right of ownership to be able to offer the course, they agree to submit their course for review, and they cannot offer the course until it is approved. They agree to specific class size limits and to offer the course for four consecutive semesters. In addition, providers agree that teachers must be certified in the state of Texas and have taken TxVSN-approved professional development in effective online teaching.

As the “receiver” of online courses, districts agree that they are responsible for mentoring/monitoring online students for the duration of the course as part of the agreement. Districts must also provide a site coordinator who registers students, makes sure prerequisites have been met, and mentors and monitors student progress. Districts must also agree to accept the grade and transfer it to the student’s transcript using local grading policy, depending on how courses may be weighted. For example, a district might choose AP courses to be weighted more heavily than regular courses.

Similar to Louisiana, Texas also uses EOC exams. However, one of the challenges impacting accountability is how the test is administered for online students. With the flexibility of online learning, students may

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Exploring Accountability
Beyond Michigan

be taking courses out of sequence, such as for credit recovery or acceleration. Some students may be taking courses typically offered during the second semester within another semester of the school year (fall or summer). This can complicate EOC testing. For example, a student could take algebra and finish in fall, but testing is not until the end of spring. His/her performance may be affected as a result. There is also a challenge in proctoring state-level tests for fully online students. Students in outlying areas may need to test, and a local school may not want to administer the assessment. The responsibility that the test is administered remains with the TxVSN.

Despite working to ensure quality and accountability across the state when it comes to online instruction, TxVSN continues to work to make improvements. In a recent needs assessment regarding online courses in Texas, three major issues were identified: 1) lack of awareness on the part of districts, parents, and students as to what online options were available, 2) questions about funding in terms of how to pay for online courses, and 3) fear of losing local control over curriculum/content/instruction on the part of districts. These issues are indicators of the hesitancy on the part of districts regarding online education. Of the 1,200 districts in Texas, less than 300 have signed agreements with online providers. While the signed agreements are not required in law, they are required in practice. A district cannot enroll a student in an online course without signing the agreement. These concerns have also prompted recent changes. Local districts can now specify the TxVSN provider they find acceptable for their students. In making this decision, TxVSN suggests that districts may want to consider data from successful course completion rates by a specific provider, both as a whole and by each individual course, in addition to feedback rankings on courses from students and parents — all of which are provided in the TxVSN course catalog.

Minnesota

Students in Minnesota have long had school choice options (open enrollment, charter, post-secondary concurrent enrollment), dating back to 1985. When these options became available, there was push back from districts with multiple concerns, such as not knowing what students were learning. Districts were also worried about the rigor and quality of the courses, the level of qualification of the teachers, and the levels of attendance within the courses. Legislators went around the state to let the districts know that they had to allow students to participate in school choice opportunities.

When it comes to online education, Minnesota was one of the first states to enact policy to allow students the choice to take an online course from various school-based providers. Students in Minnesota have the option to take supplemental online courses from providers that are approved by the Minnesota Department of Education. Currently, a variety of supplemental providers, including charters and district-level providers, offer online courses. In terms of financial cost, 88% of funding goes to the provider, and 12% stays at the local district.

Accountability within the state is based on inputs and outcomes. The courses offered online are required to meet state academic standards. As a result of districts reporting the perception that online courses lacked rigor, a verb in Minnesota legislation was changed from “affirm” to “verify” that courses met state academic standards. Every core course provider had to complete an extensive alignment document verifying the curriculum, how it was being taught, and what assessments were being used to verify that the standards were being met. At that point, accountability was focused more on inputs rather than student outcomes. There are now multiple measures to

ensure quality, including a review process in which the provider application is reviewed by four reviewers and including one or two people at the department and one or two in the field. In addition, outcome variables are used to measure how students are growing in their learning process, including proficiency, student growth, and graduation rate. The number of students who have successfully completed online courses is reported to the Minnesota Department of Education, with a typical completion rate of 70%, although this varies due to a variety of factors. Many students who do not complete are those who decided for whatever reason that online learning was not what they had expected.

However, it can be difficult to uncouple the accountability at the output level because the state assessments in English/language arts and math are given only once a year. Therefore, it is difficult to separate out how specific online courses may or may not have had a direct impact on student performance. While EOC exams have been considered, this option has not taken hold for fear of the unintended consequences it might cause. One concern among districts is the disparity that may exist between providers and the difficulty in developing a common EOC exam, particularly for certain content areas such as liberal arts, social studies, and ELA.

Online teachers in Minnesota are hired by the online program and work with a counterpart who is on-site at the local school. While schools are required to identify a contact person, they are not required by law to assign a mentor. Also, the strength of the partnership between the online teacher and the on-site contact person depends on the interest of the local district. Each district looks at this contact person very differently, and unfortunately, some districts do not express a desire to become involved. However, Minnesota law states that the district must designate a contact person to facilitate and monitor student progress in the online course as well as track his/her accumulated credits toward graduation. Typically, this role falls on the school counselor.

As with Texas, the awareness of online learning options is relatively low within the state. Despite this, the comfort level is fairly high among those schools with online students because the courses are provided by local school districts and overseen by curriculum directors and school boards. Even if a national vendor is offering a course, there is a district overseeing the course through the adoption/review process. This provides the opportunity for more local control, and the school districts have more “home-grown” content with local teachers teaching the courses. In addition, the Minnesota Partnership for Collaborative Curriculum Project\(^\text{19}\) was created as a space where local teachers could create digital content for one-to-one or blended initiatives. Teams of teachers from different districts are funded to create courses together. This project represents a grassroots effort with nearly 200 districts involved.

Following these additional perspectives, the next section covers recommendations that were offered by the stakeholders involved in this study.

\(^{19}\) Minnesota Partnership for Collaborative Curriculum Project (n.d.). Retrieved from https://sites.google.com/site/innovativeinstruction
Based on the results of the interviews and research effort, there were eight general recommendations. These recommendations include the following:

1. Clear Communication of Expectations and Awareness
2. Addition of Student Support Structures
3. Specific Guidelines for Teacher of Record and Mentor of Record Roles
4. Changes to State Reporting Guidelines
5. Updates to Course Catalog
6. Additional Requirement of Online Course Syllabus under Section 21f
7. Pilot the use of Michigan Interim Assessments for Online Courses as End of Course (EOC) Exams
8. Updates to Course Review Process

Within each of these general recommendations, there were also specific key recommendations that pertain to each stakeholder. Each recommendation and their key recommendations are shared in the sections below.

1. Clear Communication of Expectations and Awareness

Despite Michigan having required an online learning experience to graduate from high school for almost 10 years and course choice policy for a year and a half, several stakeholders mentioned that many school districts and parents were not sufficiently aware of students’ options to take online courses. It was felt that there remains a great need to communicate and promote awareness of course choice options in online learning for K-12 students. A practical starting point for increasing awareness is to include clear language and information about online learning options within district and school handbooks. A recent survey of Michigan adults confirms this lack of awareness. In addition to increasing awareness of state and local online learning policies, there also remains an urgent need to share information with parents and districts about how to determine what quality online learning is and what it is not. As part of this awareness campaign, emphasis should be placed on creating and sharing a common, clear language that is easy to understand.

Stakeholders also wanted clear quality assurance measures for every provider and stressed the importance of these measures being openly communicated to the public. Stakeholders also suggested clear contracts highlighting what each party is responsible for in order to help students succeed. For all stakeholders, communication should include sharing out practices and resources that are necessary to help students reach their goal.

To this end, professional development for administrators, teachers, mentors, parents, students, and others should be provided. To help ensure the success of online students, districts need to know about necessary resources to provide so that stakeholders realize for what and how they are being held accountable (See Appendix B for stakeholder resources). It is also essential to provide guidance for mentors and counselors as to which learning environment will best meet student needs. Everyone wants consistency in standards and expectations. Quality Matters (QM) can serve as the consistent standards, and their training would be ideal for stakeholders, especially administrators, teachers, and mentors. Districts need to understand what qualities to look for in effectively designed online courses and also understand what support systems

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21 Ibid.
they need to implement in order to provide the best support possible for students who are taking online courses. Empowering districts to work with parents and offering students the best choice for their learning path is less about data and high stakes accountability and more about transparency.

Based on the context above, the key recommendations for each stakeholder are listed below:

- Various stakeholders, including MDE, MEA, MEMSPA, MASA, MASSP, and MVU should work together to inform both districts and course providers about their responsibilities to online students. Additionally, a similar process to that employed by TxVSN holding districts and online providers accountable via a clear contract that outlines each stakeholder’s rights and responsibilities to the online student might be considered.

- School districts should inform parents of students’ options to take online courses via district policies, school handbooks, and websites.

- School districts should require a signed agreement from parents that acknowledges their rights and responsibilities when their child is enrolled in online courses.

- School districts and course providers should work together to provide professional development specific to online learning for administrators, teachers, mentors, counselors, and students.

- Course providers should offer an online learning orientation for students that identifies potential areas where students may need additional support.

- School districts should familiarize themselves with the iNACOL and QM standards specific to quality online programs, online course design, and online teaching and use these standards to evaluate online course provider options.

2. Consistency and Value of Student Support Structures

Local level student support structures are crucial. Districts should help with follow-up and follow through to assist students. Because funding is provided to the primary district above and beyond what that primary district pays to the providing district, stakeholders felt that the primary district should be held accountable for providing students with supports they need to be successful in the online learning environment. As one of the stakeholders noted, “Online learning is often most used as a remediation rather than an acceleration. And when we’re using it as a remediation, the kids aren’t getting a lot of support. They’ve struggled before, and it’s no different when they take an online course. So the districts should have some responsibilities like a mentor who can provide some support and reinforcement.” But the stakeholder also acknowledged that these support structures come with an associated cost, along with an investment of time and necessary structure to make it work. An additional piece of accountability that has been added to the pupil accounting manual for the 2015-16 school year is the inclusion of interaction logs for Section 21f courses so that the mentor of record documents on a weekly basis his or her interactions with each online student during a four-week window.

Based on the context above, the key recommendations for each stakeholder are listed below:

- School districts should invest in strong mentoring and student support programs for their online students, including formal mentor training.

- MDE and school districts need to identify and establish non-burdensome processes to document that the mentoring services provided are in line with best practices and minimal expectations.
3. Specific Guidelines for Teacher of Record and Mentor of Record Roles

Prior to the 2015-16 version of Section 21f, there was no language requiring course providers to supply the PIC of the online teacher to the school district claiming the student in membership. In the absence of that PIC, districts tended to enter the mentor teacher’s PIC when reporting the teacher of record to the state. Stakeholders believed it important that schools accurately report teacher of record and mentor of record information. The new language requires the sharing of needed information, but does not guarantee that schools will change their reporting conventions. Ongoing awareness campaigns clarifying the difference between these two roles and stressing the importance of accurately capturing who served in each capacity will be essential to changing reporting practices.

Based on the context above, the key recommendations for each stakeholder are listed below:

- All stakeholders should continue defining and clarifying the roles of teachers of record and mentors of record. Include in these roles the need for consistent monitoring and interaction to assist online students.
- MDE, MVU, and other state-level educational organizations should continue to spread awareness about the importance of accurate data regarding the mentor of record and the teacher of record.
- School districts should set up quality assurance measures and a training process around the importance of accurate data reporting for online students.

4. Changes to State Reporting Guidelines

Stakeholders expressed an overall need to improve the quality and comprehensiveness of the readily available data to evaluate the performance of both individual online courses as well as individual course providers. Given that districts are responsible for ensuring that the online courses their students select from the statewide catalog are rigorous and high quality, more information that can inform such decisions is needed.

At present, online course providers offering courses through the statewide catalog are required to report on an annual basis the number of students who enrolled in the online course, as well as the number of those enrollments that earned 60% or more of the total course points. While this is important information, it represents only a small slice of important information. For instance, in addition to being able to view data at the individual course level, districts would be better served in their decision-making process if they were also able to look at aggregated performance data for an online provider. There is the possibility of adding such aggregated views to the statewide catalog, but such an effort itself is likely not enough. This is because the data collected within the statewide catalog itself pertains only to the online course enrollments that are made under Section 21f. Section 21f enrollments represent a very small percentage of all the online enrollments statewide. In many cases, the number of enrollments online course providers have with Michigan students outside of Section 21f dwarfs what is recorded in the statewide catalog.

Thus, the following recommendations are offered:

- When reporting student course information to the state as part of the Michigan Student Data System (MSDS), it is recommended that schools be required to report the following three additional fields for online enrollments:

22 Note: Third-party teachers have the ability to get a PIC in Michigan.
Recommendations

◦ The name of the district, ISD, or the name of the entity offering the online course in the statewide catalog.

◦ The name of the company, organization, or district that is providing the actual content for the online course.

◦ The name of the company, organization, or district that is supplying the online instructor for the online course.

• Using the data collected above and elsewhere, the state should make transparent both the number of enrollments served by online course providers as well as student performance for each provider. Where possible, additional information, such as AP exam pass rates should accompany this information. Consider the MI School Data website as a place to house such information on online providers.

• In addition to having schools report data on online enrollments, the state should explore ways to have online course providers provide similar data directly to the state.

It is worth noting, however, MDE should be sensitive to asking districts for too much reporting and duplicate reporting (See Headlee and Adair). Because of these cases, MDE is cognizant that no matter how valuable these data may be, every new field is a fight and needs to be approached strategically. Additionally, MDE is continuing to work on linking their data systems with online providers’ data systems so that they know more about who is teaching, what kinds of qualifications they have, how students are progressing, and whether students are learning. MDE understands that moving to a more fine-grained accountability system that can parse out data based on where students receive instruction is a good direction to go, but they also realize they do not have the means or the data systems to make that effective yet. They are continuing to work to make sure they have the right logistical pieces in place.

5. Updates to Course Catalog

As mentioned above, the idea of supplementing course performance data for individual courses with aggregated views of course providers was positively received. Stakeholders also expressed interest in capturing student and parent ratings, similar to that of TripAdvisor or Yelp, which would allow students and parents to comment on specific courses. Such a feedback process is already in place in Texas and can be seen in the TxVSN catalog.

Based on the context above, the key recommendations for each stakeholder are listed below:

• As the state develops more comprehensive systems for tracking online providers, require a link to the state data on each provider be part of the information available to parents and students when choosing online courses.

• Incorporate a small set of course ratings for each course that is completed by students who take the course, as well as collect feedback from their parents.

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6. Additional Requirement of Online Course Syllabi Under Section 21f

Another suggestion is to add an alignment document to the list of required components of an online course syllabus. At present, the Micourses website (Michigan’s Online Course Catalog) permits course providers to include an alignment document, but they are not required to do so. Stakeholders felt these documents should be required because they provide critical information to districts that help them determine whether a course is of sufficient quality and rigor. It also aids districts in determining the degree to which the topics covered in an online course best align with the topics presented in the district’s face-to-face version of the same course. Some even mentioned that it better allows for the course content itself to be uncoupled, facilitating the targeting of certain units or lessons to make up if students are repeating the course or have shown proficiency in other course topics.

**Key Recommendation:**
- Add language to Section 21f that requires the inclusion of a link to a course alignment document as part of the online course syllabi.

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7. Pilot the use of Michigan Interim Assessments for Online Courses as End of Course Exams

Aligned with the need for consistency across courses would be the idea of incorporating common End of Course (EOC) exams to measure what a student has learned. Currently, there are no independent, external measures of student competency to verify the accuracy of the course grade. According to a few of the stakeholders, completion rates act as a minimum level of accountability, but a statewide common measure of course performance would allow districts to better benchmark student learning as well as provide important information for comparing course providers.

A notable challenge with EOCs is that they are typically not available for every course, and for cost purposes, may be limited to core courses required for graduation. The use of EOCs is already in place in some states, such as Florida. In Florida, EOCs are used as a mechanism to increase student achievement as well as to document readiness for college and career. Florida’s EOC results are available on the Florida Department of Education website.\(^{26}\) Louisiana also has EOCs in place that are offered three times a year. The recommendation is to have the EOCs available at the end of every semester for students who take a particular subject and need to be assessed at the time they complete the course. One suggestion for EOCs in Michigan, since funding is not available for full implementation, is to pilot them with online courses. This would allow stakeholders to use them if they wanted to build interest and buy-in. There is acknowledgment, however, that EOCs have cost implications as well as time considerations for their implementation. Additionally, there is concern regarding universal acceptance of EOCs based on whether or not each stakeholder is in agreement about the rigor and quality of the EOC exam itself. There is increasing push back regarding standardized testing, and implementing such a wide-scale assessment initiative may go against that growing sentiment.

**Key Recommendation:**
- The Michigan Legislature should fund a pilot that studies the use of Michigan’s Interim Assessments using online courses to provide a course independent measure of student competency.

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8. Updates to Course Review Process

Although the current online course review guidelines call for the inclusion of external review members, stakeholders believed that the degree to which this was occurring was less than universal. Furthermore, there was a desire to see greater consistency in how the courses were being reviewed, specifically as it pertained to a shared competency of course reviewers. This call aligns closely with MVU’s initiative to train ISD and other educational personnel across the state in how to conduct online course reviews. The shared training helps to ensure that reviewers have a better idea of what they are looking for, a common vernacular, and a common process for considering quality assurance in online courses.

The concept of having a third party provide a formal review that leads to a seal of approval was also well received. As an example, QM is a national organization that conducts in-depth evaluations of courses and certifies high performing courses with a recognized symbol. The idea of helping to differentiate courses based on an independent seal of approval was seen as advantageous for helping to prove that the online course is rigorous and of high quality. However, there was some concern as to the expenses associated with engaging in such an intensive review process.

Based on the context above, the key recommendations for each stakeholder are listed below:

- School districts should enroll in QM training so that all course reviewers use a set of common standards when reviewing courses.
- School districts should encourage third-party providers to obtain independent seals of approval, such as QM certified status, as a quality assurance measure.

Continuing the Accountability Conversation

While this study has highlighted many recommendations regarding accountability for K-12 online learning within the state of Michigan, the conversation needs to continue. As one stakeholder mentioned, “When thinking about accountability, the difficulty is not just online and blended; it’s the collective advent of shared models and unique models of how students are educated, and what are we going to do differently accountability-wise to make sure the student is learning what he/she needs to learn.” Another stakeholder relayed the sentiments for the collective:

Let’s incentivize the behavior and support the practice rather than change the metric. If you change the compliance function and you don’t change the behavior around it, then it’s not going to actually result in a change for kids. If we’re going to do anything about accountability, it is a piece of a bigger solution but it’s not the solution. Changing that policy lever, we have to consider what other pieces have to change along with it and what behavior we want to incentivize. It’s not more online learning; instead, it’s more quality online learning in order to arrive at better outcomes for students.

Accountability should be communicated as dynamic, real-time, and leading to continuous improvement, where incentives are not centered on whole school determinations and/or end of year interventions. Rather, the focus should be on individual students and how educators are meeting the needs of each student.
Interview Protocol

1. What policies are in play when it comes to accountability both at the national and state levels?

2. What impact, if any, do you think the ESEA renewal will have on accountability?

3. What is the underlying current in terms of school accountability staying with the local district?

4. What is the rationale for not allowing accountability to be uncoupled?

5. What kinds of stories are you hearing when it comes to accountability in Michigan? Other states? Nationally?

6. What’s the difference between accountability of district-level traditional school models vs. supplementary online models?

7. Depending on different stakeholders (policy makers, district-level administrators, school administrators, teachers, third party providers, school board associations, teacher association, teacher unions) involved, do they share the same story or are each of them telling different stories when it comes to describing how accountability plays out?

8. What’s your reality – how does this play out in Michigan?

9. What are the pain points – what’s not working?

10. What would be a good solution for all involved? Is it different things for different stakeholders?

11. In your opinion, what are recommendations for:
   - District level accountability?
   - Online provider accountability?

12. Policy-wise:
   - What could be done at a national level?
   - What could be done at the state level?
   - What could be done at a local level?
Michigan Virtual University Resources

In response to stakeholder requests gathered through surveys, focus groups, customer feedback, and conversations, MVU has developed a number of practical resources to support school administrators, counselors, teachers, parents, and students. All of them are freely available online and briefly explained below:

Section 21f Tool Kit. School administrators and implementers at the building level have sought support for meeting the requirements of 21f, a section of state educational statute, in the form of general information, guidelines, sample communications, and implementation strategies. MVU, with input from the Michigan Department of Education, the Michigan Association of Secondary School Principals, the Michigan Elementary and Middle School Principals Association, the Michigan Association of School Administrators, the Michigan Association of Intermediate School Administrators, the Michigan Association of School Boards, the Michigan Association for Computer Users in Learning, the Michigan Association for Supervision and Curriculum Development, and Regional Educational Media Center representatives, created the Section 21f Tool Kit (available at https://micourses.org/resources/21f_Tool_Kit.html). From FAQs about the law to a 20-page implementation guide, the Tool Kit contains important information for both consumers and producers of online courses. In addition, the Tool Kit includes links to relevant sections of the Pupil Accounting Manual; draft letters for parents, school personnel, and school board members; sample school board policy; sample surveys that can be used to gauge local interest in online learning, and the guides mentioned below. Tool Kit elements are updated annually.

Parent Guide. In response to concerns expressed by educational stakeholders who support students, Michigan Virtual Learning Research Institute staff developed a resource aimed at parents and guardians to help them understand more about the online learning experience. One of MVU’s most widely distributed resources is the Parent Guide to Online Learning, a 16-page publication prepared for parents, guardians, counselors, and others who want to help students decide whether online courses are a good option for them. The guide details what online learning is and introduces some of the benefits online learning offers. It also includes information about the characteristics of successful online students and how to prepare for learning online. The Parent Guide is available free at http://media.mivu.org/institute/pdf/parentguide.pdf. The guide is updated annually to reflect changes in the statute and in response to stakeholder feedback and requests.

Mentor Fundamentals. Like the Parent Guide, Mentor Fundamentals: A Guide to Mentoring Online Learners is full of practical, research- and experience-based best practices for school employees or parents who provide on-site support for online students. Much of the content for Mentor Fundamentals was distilled from interviews with 14 experienced mentors from a range of school settings. These interviews yielded significant shared conceptions about mentor roles and responsibilities, proven practices that lead to increased student success, and common concerns about pacing and communication issues. The guide also includes a section that highlights the research conducted around mentoring online students. Mentor Fundamentals fills an important void for schools where the professional development and assistance that many mentors receive has been lacking, as is consistency in how schools meet the state’s requirement for online students’ access to a mentor. Administrators and mentors in particular have asked specifically for program guidelines and mentor support resources. Mentor Fundamentals is available free at https://micourses.org/resources/pdf/toolkit/mentor_guide_14.pdf and is updated annually to reflect stakeholder feedback and requests.
Mentor Training. To further address the need for mentor training and professional development, MVU, through MVLRI and its Fellows program, now offers Mentoring Basics, an online mentor orientation and training module that combines research with best practices shared through the mentor interviews. Mentoring Basics is available free at http://olot.mivu.org/mentor/articulate/presentation.html. Mentoring Fundamentals and Mentor Basics are just two of the resources MVU plans to include as it works to build a formal mentor network – Mentors Matter – to connect, educate, and support the important work building-level personnel are doing to help online students in their schools maximize their online learning experiences. Staff will gather feedback about Mentoring Basics from mentors and administrators through a feedback button on every page of the resource and through a brief survey that will be available via a link at the end of the program or through the Mentors Matter website.

Mentor Program Case Studies. Supporting Online Learners: Michigan Mentor Program Case Studies was undertaken to describe what mentoring of online students looks like in a particular school, develop a set of profiles that illustrate the range of mentoring programs across the state, and provide points of comparison for mentors, instructors, administrators, parents, and students about alternative support structures and strategies for online students. Because there has been no direction given for how mentors are chosen, the scope of their work, or the logistics, the report is intended to provide administrators and mentors knowledge of successful programs to help guide them in decision making about new programs and in improving existing programs. The report reveals the variety in staffing configuration, how mentor time is allocated, mentor preparation, mentor experience, program size, and student demographics. The summary gives an overview of what programs have in common and where they differ. A section on advice from mentors to administrators, teachers, and parents works as a primer on what the mentors interviewed think is most helpful in, for example, understanding what the mentoring relationship looks like and what elements to focus on when making decisions. The report is available as a free download here: http://media.mivu.org/Institute/pdf/MentorsProfiles15.pdf. The next phase of investigation is to examine how online instructors, on-site mentors, parents, and student peers work to support student engagement in supplemental online enrollments.

OLOT. MVU’s Online Learning Orientation Tool – OLOT – is a free, self-paced, web-based resource intended to help students understand what online learning entails while introducing them to the skills and knowledge that are key to success in online learning. This resource was developed to respond to teachers’, counselors’, and administrators’ concern that students did not fully grasp the realities of online learning. These stakeholders wanted a means of helping students understand what was expected and offer preparation that would increase the likelihood they would be successful online students. OLOT is provided through a platform that is compatible with any device so it is widely available, regardless of the sophistication of the student’s technology. OLOT can be found at http://olot.mivu.org. Staff will continue to update this resource in response to user suggestions and requests, actively gathering feedback from students and the adults who oversee student use in three ways: 1) through a feedback button on every page, 2) via email exchange, and 3) during conversations with users.
Teaching Endorsement Pathways. Michigan Public Act 201 of 2012, of the Michigan Legislature tasked Michigan Virtual University, through its Michigan Virtual Learning Research Institute, with recommending guidelines and standards for a new teaching endorsement in online and blended instruction. The law directed MVU to, “In collaboration with the department and interested colleges and universities in this state, recommend to the superintendent guidelines and standards for a new teacher endorsement credential related to effective online and blended instruction.” Subsequent Public Acts 60 of 2013 and 196 of 2014, continued this work with similar language around collaboration with higher education to explore online teaching credentialing. As part of this effort MVU brought together a working group with representatives from Michigan public universities, public colleges, private colleges, the Regional Education Media Center of Michigan, the Michigan Department of Education, and the Michigan Association for Computer Users in Education. The working group recognized the need for ubiquitous professional development around online instruction but was sensitive to the historical role of colleges and universities in teacher preparation. While there is still considerable progress to be made, the group is working to identify complementary pathways through which large numbers of teachers could be introduced to and trained at a basic level for online instruction, as well as increased opportunities for teachers to further their online teaching training with partner colleges and universities. Future work around this legislative directive will center on identifying necessary competencies for each pathway as a basis for programs as well as pursuing formal relationships with colleges and universities to ease teachers’ transitions from the first level of training to the more formal levels.