

FLORIDA DEPARTMENT OF EDUCATION



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Pam Stewart
Commissioner of Education



August 7, 2013

Pam Stewart
Commissioner of Education
325 West Gaines Street, Suite 1514
Tallahassee, Florida 32399-0400

Dear Commissioner Stewart:

In accordance with Section 20.055(5)(h), Florida Statutes, attached is the six-month status of corrective actions taken in response to Auditor General Report #2013-094, *Virtual Instruction Programs*.

If you have any concerns regarding this status report, please let me know.

Sincerely,

A handwritten signature in black ink that reads "Mike Blackburn".

Mike Blackburn
Inspector General

Attachment

cc: Joint Legislative Auditing Committee

Department of Education
 Inspector General – External Audit Liaison
 Status Report on: Virtual Instruction Programs
 AG Report # 2013-094 Issued: February 7, 2013
 Status as of August 7, 2013

Finding	Recommendation(s)	Management Response as of January 18, 2013	Management Response as of August 7, 2013	Anticipated Completion Date & Contact
<p>1. State Board of Education Rules and Statutory Recommendations Section 1002.45(1), Florida Statutes, states, in part, that the State Board of Education (SBE) shall adopt rules necessary to administer Section 1002.45, Florida Statutes. Pursuant to this authority, SBE has adopted Rule 6A-6.0981, Florida Administrative Code, pertaining to provider approval for VIPs. However, SBE rules have not been adopted related to the administration of the VIPs. Our audit disclosed the following areas in which rules would better enhance the integrity and accountability of the State's VIPs and VIP resources.</p>	<p>We recommend that rules be adopted to provide a standard provider contract template for use by the school districts. Such a template should include all contract elements required by Section 1002.45, Florida Statutes, as well as other provisions such as contract monitoring requirements, data quality requirements, audit requirements, the appropriate provision of computing resources, and the security of all student data to better enhance the integrity and accountability of the State's VIPs and VIP resources. Additionally, the Legislature should consider clarifying the intent of Section 1002.45(3)(d), Florida Statutes, as it relates to the provision of computing resources to VIP students.</p>	<p>While we agree that school districts could benefit from additional guidance on VIP contract requirements and contracting with VIP providers. We do not agree that formal rule adoption by the department to provide a standard contract template is the most practical way to accomplish the objective of enhanced integrity and accountability of the State's VIPs and VIP resources. The department will continue to assist the school districts in developing and/or improving their formal contracting procedures by providing clear guidance consistent with the provisions of Section 1002.45, Florida Statutes, as well as offering technical assistance and shared best practices which include sample contract templates. Additionally, the department will share with legislative staff the recommendation to consider clarifying the intent of Section 1002.45(3)(d), Florida Statutes, as it relates to providing computing resources to VIP students.</p>	<p>In response to the audit, DOE developed a sample contract template. On April 9th the template was sent to Leon, Pasco and Palm Beach virtual liaisons for review/edits. Feedback was received from two districts on April 9th and April 16th and some suggestions were incorporated into the contract. On May 20th the template was sent out to the Florida District VIP Google Group for review. Only one suggestion came back (minimum expectations for data security) and has been added to the template. The VIP Model Contract Template will be put on the Virtual Education Website August 25th, (located under the District Virtual Instruction Program link). The legislative staff did not make changes to section 1002.45(3)(d) as it relates to providing computing resources to VIP students.</p>	<p>August 25, 2013. Sally Roberts</p>

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<p>2. Statewide Monitoring of VIP Provider Student-Teacher Ratios Section 1002.45(2)(a)7.c., Florida Statutes, requires that Department-approved VIP providers publish student-teacher ratios and other instructional information in all contracts negotiated with school districts. While this section appears to contemplate the ability of school districts to monitor the reasonableness of student-teacher ratios on a district-by-district basis, the nature of the virtual instruction world compels that a more comprehensive assessment of such ratios be performed on a Statewide basis for all Florida school districts by VIP provider. VIP providers may offer services to multiple school districts throughout Florida and may also offer services to more than one state. As a result, VIP teachers may provide instruction to students in more than one school district, thus prohibiting any one school district from effectively monitoring the reasonableness of student-teacher ratio for its district or statewide.</p>	<p>The Department, in conjunction with school districts, should work to establish a mechanism for reporting and analyzing detailed student and teacher information to effectively monitor the individual districts and the Statewide reasonableness of VIP provider student-teacher ratios.</p>	<p>The Department recognizes that its VIP providers may offer services to more than one district and/or state and, therefore, requires its VIP providers to disclose overall teacher load which encompasses the total number of students assigned to a teacher. The Department's database has two record formats in the Student Information System that could be matched to identify all the students that were assigned to a particular teacher by course and section. The school district reports this information for both their district-operated and their provider-operated programs. The record formats are the Student Course Record and the Teacher Course Record. The Department will consider matching these records to provide for effective monitoring. In addition, school districts could ask for class rosters from their providers to serve as an additional level of verification.</p>	<p>During the VIP approval process providers are required to disclose student-teacher ratios and teacher loads (total number of students assigned to a teacher) in their application and are required to post this information on their Disclosure Requirements website. Student-teacher ratios and teacher loads are also included in the Provider-District Contract Template. The Virtual Education Office recently met with the Database Office to discuss the possibility of matching the Student Course Record and the Teacher Course Record for additional verification. A follow-up meeting will be scheduled after Survey 2 data is final in early 2014.</p>	<p>August 2014 Sally Roberts</p>