



# Dave Yost • Auditor of State

Chairwoman Gail Manning  
Joint Education Oversight Committee  
1 Capital Square, Room 129  
Columbus, Ohio 43215

December 11, 2018

Dear Chairwoman Manning,

In November 2018, the Ohio Department of Education (ODE) submitted *Recommendations of Definitions Related to Online Learning* to the Joint Education Oversight Committee pursuant to a statutory request. The Auditor of State (AOS) reviewed ODE's proposed definitions and found that, while ODE sought input from community school stakeholders in the development of these recommendations, the definitions themselves are ineffective and ambiguous.

For the period covering fiscal years 2016 and 2017, the AOS conducted interviews of the Ohio Department of Education (ODE), learning management software (LMS) vendors, as well as community school administrators and reviewed a sampling of Ohio's electronic community schools or "e-schools" regarding Ohio's standards for e-school funding and ODE's Full-Time Equivalency (FTE) Reviews. Additionally, AOS selectively tested FTE support documentation for certain e-schools and compared its results to those of the ODE FTE Review Determinations, however, we did not attempt to recalculate FTE's. In a report forthcoming this week, AOS describes in detail the challenges encountered during these reviews, including but not limited to, the following areas:

- Variances and limitations in Learning Management Systems and Student Information Systems
- System technology weaknesses and integration hurdles
- Duplication and overlapping of classroom and non-classroom participation hours
- Idle time and automatic log-out inconsistencies and vulnerabilities
- Inconsistency and gaps in ODE oversight of e-schools

The AOS report makes numerous recommendations to ODE and the General Assembly regarding e-school funding and FTE monitoring reform. We believe this report will provide the Joint Education Oversight Committee and ODE with the insight and specific examples necessary to identify and better understand the weaknesses in ODE's proposed definitions. The report also offers a number of solutions to the e-school funding dilemma for consideration by the Committee, the legislature, and ODE.

Sincerely,

A handwritten signature in black ink that reads "Marnie A. Frederickson".

Marnie A. Frederickson  
Assistant Chief Deputy Auditor  
Auditor of State, Dave Yost

CC: Members of Joint Educational Oversight Committee