



Washington Office of Superintendent of
PUBLIC INSTRUCTION

REPORT TO THE LEGISLATURE

UPDATE: Online Learning

2025

Authorizing Legislation: RCW 28A.250.040

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EXECUTIVE SUMMARY

The Office of Superintendent of Public Instruction (OSPI) is required by [RCW 28A.250.040](#) to report annually on online learning.

Public school districts and online school programs expressed concerns about the established multidistrict approval process, prompting OSPI to consider changes based on feedback from the Online Learning Advisory Committee (OLAC). OSPI is evaluating the impacts of current definitions and approval types on districts' ability to offer online school programs and is exploring ways to address the needs and recommendations of school districts. Districts have also reported that the 10% cap on nonresident student enrollment tied to the definition of "multidistrict online provider" has unfairly impacted smaller districts and programs in ways the Legislature may not have anticipated.

In the 2023–24 school year, there was a significant decrease in online course enrollments and student participation compared to the previous year, returning to nearly pre-pandemic levels despite an increase in the number of schools offering online courses. Data indicated a need to explore barriers that impact enrollment reporting practices, including current definitions of online learning. Additionally, equity considerations, such as access to internet connectivity, remained critical issues.

While overall enrollment in online learning has decreased, participation rates for students identified as gender X have increased compared to pre-pandemic levels. The data also show that white students represented the largest drop in online course enrollment, while Asian students accessed online learning at the lowest proportional rate of any student group. As in past years, multilingual learners and students receiving special education services continued to access online learning at lower rates than peers who did not qualify for these services.

White students, while representing the sharpest drop in online enrollment of any student group, still had the second-highest course outcomes after Asian students. Native Hawaiian/Other Pacific Islander students and American Indian/Alaskan Native students, the two student groups that experienced the lowest course success rates in overall, saw this trend mirrored in online settings. The smallest gap between successful course outcomes was for students with disabilities enrolled in online courses compared to those who were not enrolled in online courses.

OSPI is analyzing the current multidistrict approval process for modifications to upcoming approval cycles, exploring ways to improve data quality due to reporting issues tied to unclear definitions of online courses, and increasing communication with stakeholders to clarify online learning definitions. OSPI aims to enhance its reporting guidance for online learning to improve data collection and quality.

BACKGROUND

In 2009, recognizing the need to assure quality in online learning as more districts turned to virtual learning options to meet student needs, the Washington State Legislature devised an accountability system for online learning within the Revised Code of Washington (RCW) that directed OSPI to “create an approval process for online providers” per [RCW 28A.250.005\(4\)\(b\)](#) and report annually on the state of online learning in Washington per RCW 28A.250.040.

The Legislature asked OSPI to include:

- Student demographics,
- Course enrollment data,
- Aggregated student course completion and passing rates, and
- Activities and outcomes of course and provider approval reviews.

This report provides information about online learning for the 2023–24 school year. Online learning is a delivery model for instruction. An online course may be delivered either as a traditional course in a student’s schedule or more commonly as one of three course models (online, remote, or site-based) in an Alternative Learning Experience (ALE).

Definitions

The definitions of online learning terms are found in [RCW 28A.250.010](#) and [WAC 392-502-010](#).

A “multidistrict online provider” as defined in Washington state is either:

- A private or nonprofit organization that contracts with one or more school districts to provide online courses or programs to K–12 students from one or more school districts, or
- A school district that provides online courses or programs to students who reside outside the geographic boundaries of the school district.

“Not Online Students” means students who did not have any reported online course enrollments for the 2023–24 school year.

“Online course” is defined as a course where:

- More than half of the course content is delivered electronically using the internet or other computer-based methods;
- More than half of the teaching is conducted from a remote location through an online course learning management system or other online or electronic tools;
- A certificated teacher has the primary responsibility for the student’s instructional interaction. Instructional interaction between the teacher and the student includes, but is not limited to, direct instruction, review of assignments, assessment, testing, progress monitoring, and educational facilitation; and
- Students have access to the teacher synchronously, asynchronously, or both.

“Online school program” is defined as “a school program that offers a sequential set of online courses or grade-level coursework that may be taken in a single school term or throughout the school year in a manner that could provide a full-time basic education program if so desired by the student.”

This report uses the following terms:

- "Headcount" measures each unique student served.
- A "course enrollment" is a single student enrolled in a single course for a single grading period/academic term.
 - For example, a school with two grading periods (e.g. semesters, trimesters) and five courses per grading period could have a single student with ten course enrollments.
- "Enrollment rate" refers to the percentage of the student population enrolled in at least one online course.
- "Course success rate" is defined in Washington Administrative Code (WAC) 392-502-010 as the percentage of online course enrollments where the student earned one of the following grades for the course: A, A-, B+, B, B-, C+, C, C-, D+, D, Pass, Credit, or Satisfactory.
 - Courses marked E, F, No Pass, No Credit, Unsatisfactory, or Withdraw are not considered successful outcomes.

UPDATE STATUS

Data used in this report are from the 2023–24 school year. Data for the 2023–24 school year were extracted from the Comprehensive Education Data and Research System (CEDARS) on October 31, 2024.

Online Program and Course Provider Approvals

In the 2023–24 approval cycle, OSPI approved two online course providers and six online school programs to begin operating in the 2024–25 school year. Of these online school programs:

- Three were single-district programs approved to use any combination of district-taught courses or contracted online courses with a 10% cap on nonresident enrollment (i.e., students who reside outside the district’s boundaries);
- One was an affiliate program that may contract with approved course providers to exclusively use the course provider’s online courses without making any modifications; and
- Two were multidistrict programs approved to use any combination of district-taught courses or contracted online courses with no cap on nonresident enrollment.

Multidistrict Approval Process: Exploring Changes

School districts have advocated through OLAC for changes to the multidistrict school program approval process. The concerns expressed by school districts include, but are not limited to:

- Barriers related to the approval process and criteria that OSPI has authority to address either deter or prevent districts from starting multidistrict programs;
- District applicants view parts of the process as duplicative, such as submitting materials approved online course providers presumably would have given to OSPI for their own approvals;
- The simpler approval for “affiliate” programs, requiring the use of teachers hired by online course providers, is reported to disincentivize approval types allowing use of local teachers;
- Other models in instruction do not have an approval process, relying on existing systems, laws, regulations and local school board authority.
- Scoring is perceived to be inconsistent and raised the need to standardize how points are given.

Additionally, online school program approval depends on an understandable definition of “online course.” OSPI and OLAC recognize a need to update and clarify online learning definitions, acknowledging the changes in the use of technology in all learning environments as a mode to access curriculum and activities.

Other feedback has made OSPI consider how the 10% cap on nonresident enrollment affects a district’s ability to offer and expand online school programs. OSPI has anecdotal examples from districts of how this limit, outlined in RCW 28A.250.010(1)(b) and WAC 392-502-010(1)(i), unfairly impacts smaller districts and small programs.

On the other end of the spectrum, in the 2023–24 school year, 5 districts with multidistrict online school program approval and 5 with affiliate online school program approval (which do not have a cap on nonresident enrollment, similar to multidistrict programs) reported nonresident enrollment

rates of 92% or higher in their online school programs, with an average nonresident enrollment rate of 98% across all 10 programs (11,389 nonresident students out of 11,601 total enrolled).

For years, OSPI has received concerns about the cap’s disproportionate impact on districts of different sizes. Some examples of this disproportionate impact are provided in Appendix B.

In 2011, when thresholds were established in online learning legal definitions (i.e., “more than half of the course content” and “more than half of the teaching”) and nonresident enrollment (i.e., “fewer than ten percent”), the Legislature showed caution and discernment in creating guardrails for the emerging online learning space. Given the dramatic changes that have taken place in online learning in the last 14 years, it is worth considering how and when to update these thresholds.

Scope of Online Learning Options

The main data point for online learning is online course enrollment.

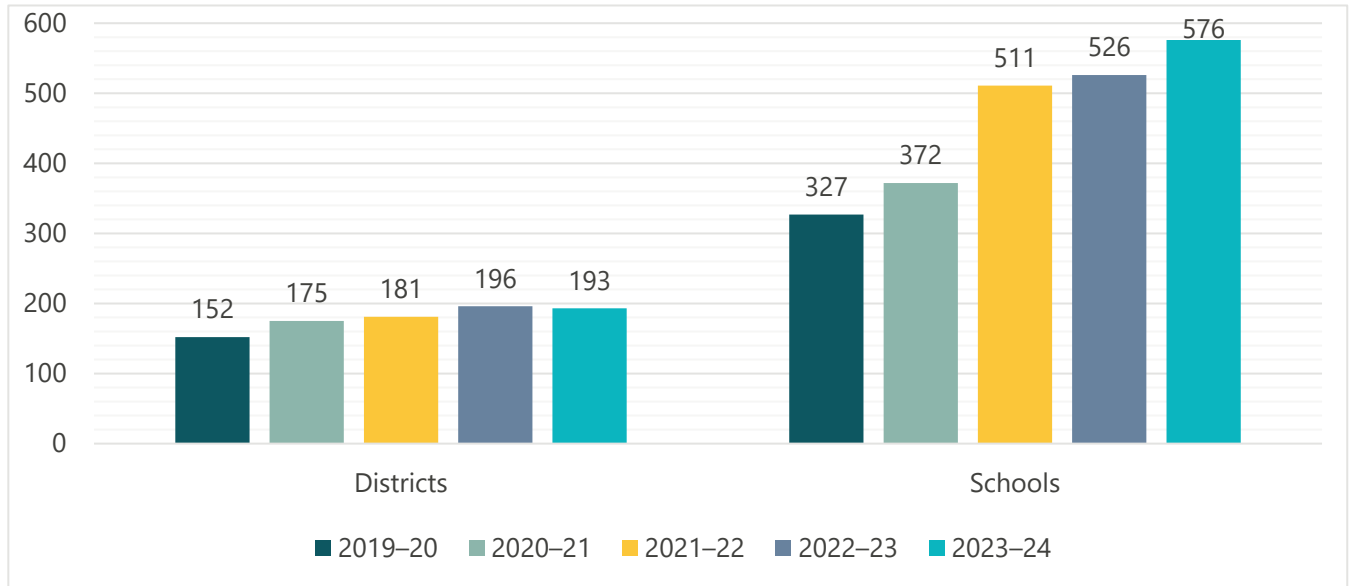
Table 1: Reported Online Learning Count Trends

School Year	Districts	Schools	Student Headcount	Course Count
2023–24	193	576	39,455	113,568
2022–23	196	526	54,380	218,619
2021–22	181	511	52,940	224,594
2020–21	175	372	55,010	230,710
2019–20	152	327	34,307	136,735

Source: CEDARS data based on unique districts, schools, and students reporting at least one online course enrollment for the designated school year.

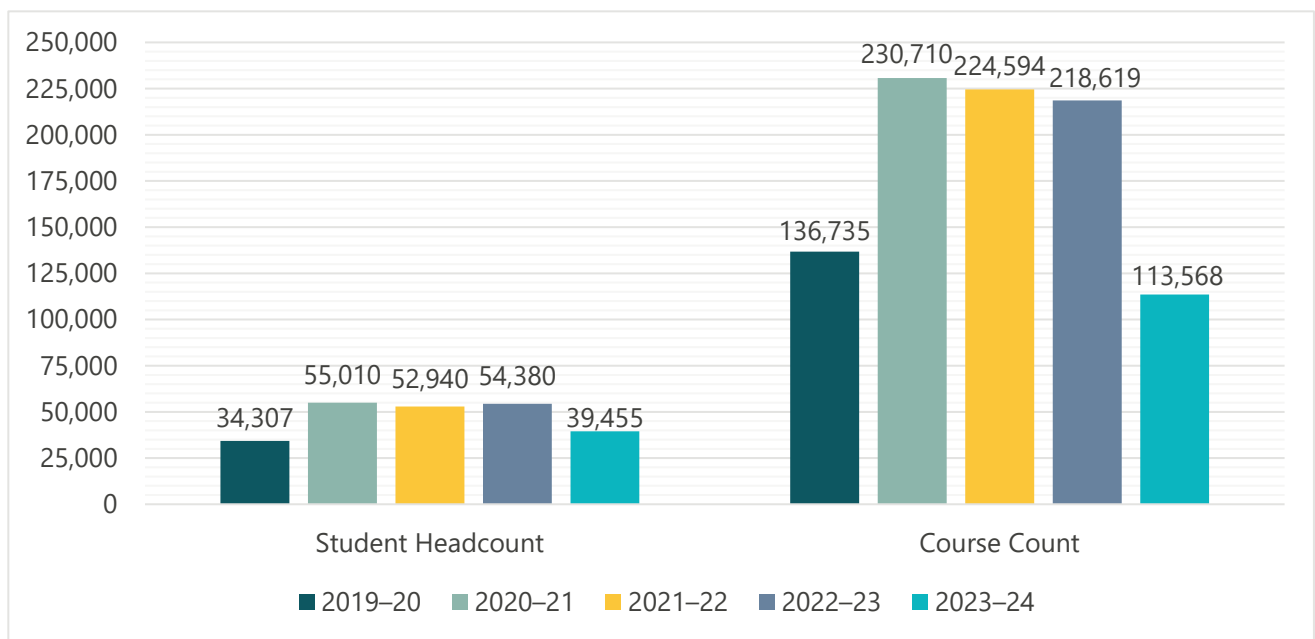
Table 1 shows that a total of 113,568 online courses were reported for 39,455 students at 576 schools in 193 school districts in the 2023–24 school year. Students enrolled in online courses in 2023–24 represent about 3.41% of all students enrolled in public education.

Figure 1: Districts and Schools Reporting Online Course Enrollments



Source: CEDARS, October 2024.

Figure 2: Student Headcount and Online Course Count



Source: CEDARS, October 2024.

Key Insights

Data reported for online course enrollment in 2023-24 identified significant changes:

- The number of students enrolled in online courses dropped by nearly one-third, and
- Total online course enrollments reported were nearly half those reported in 2022-23, yet
- The number of schools reporting online enrollments grew by 50.

This significant drop in student and course counts is unexpected based on previous years of data and national trends.

Turnover in enrollment reporting roles, transitions from one Student Information System (SIS) to another, and student transfers between districts can lead to data submission challenges and inconsistencies in reporting, especially in rural districts where staff may have multiple roles and other duties unrelated to reporting. Further analysis is needed to understand this change, which may be the result of understandable factors but also may include reporting gaps and data quality issues.

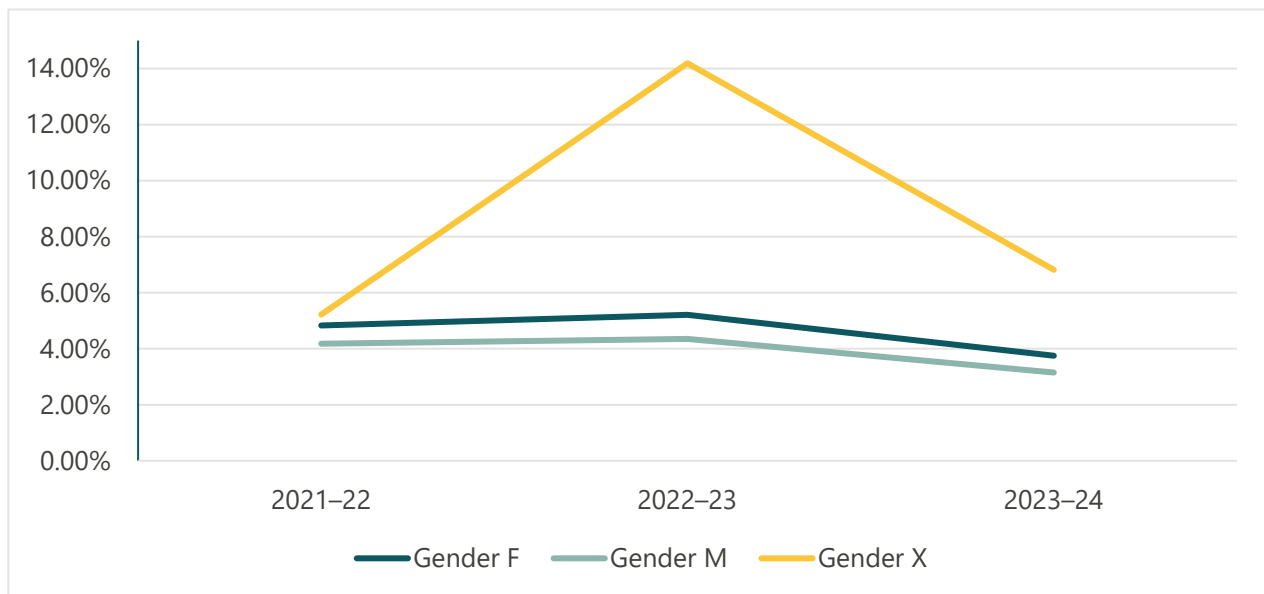
Demographics

The following charts show current demographics of students accessing online learning and the extent to which they are successful in online courses as well as enrollment trends over time.

Gender

Student enrollment by gender was analyzed in two ways: the percentage of each gender enrolled in online learning compared to the corresponding student group as a whole, and the breakdown of female students, male students, and students identified as gender X enrolled in online learning.

Figure 3: Online Learning by Percentage of Student Group: Gender



Source: CEDARS

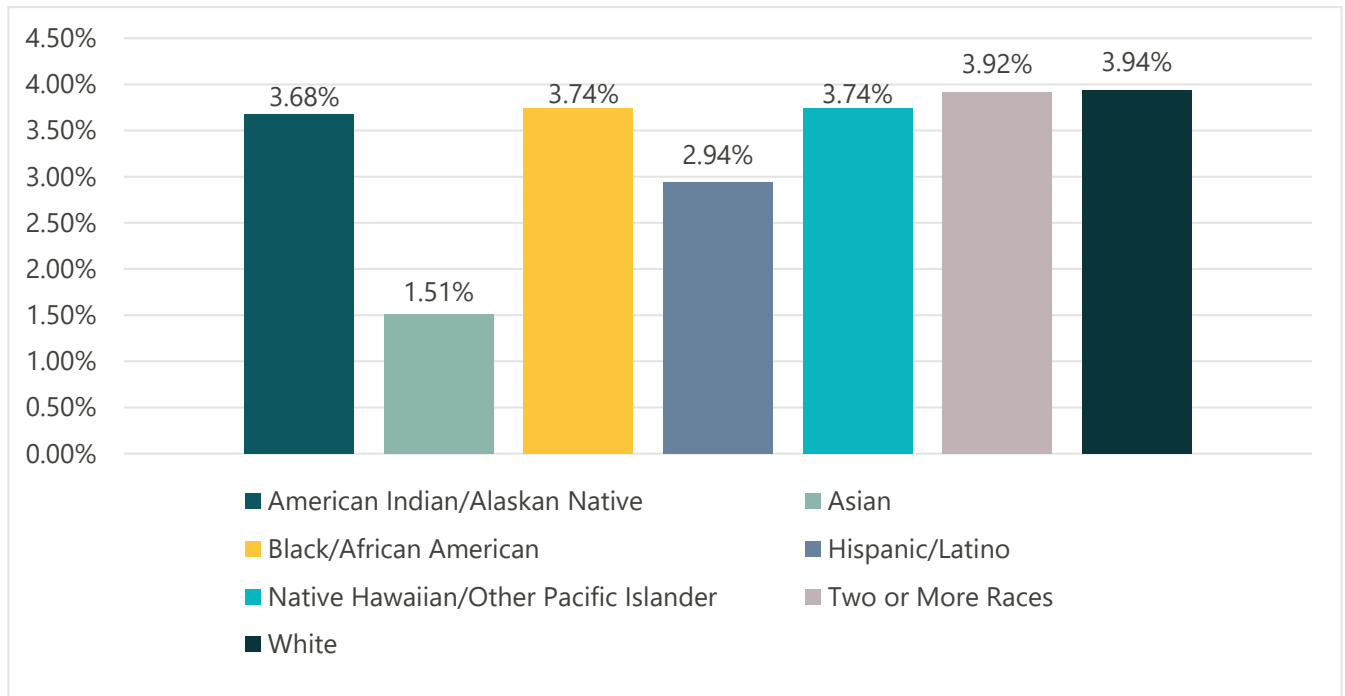
- In 2023–24, all student groups enrolled in online learning at lower rates compared to the previous two school years. However, students identified as gender X continued to participate in online learning at roughly double the rates of male or female students in proportion to their respective student groups. In 2021–22, the number of students who identified as gender X with one or more online courses in their schedules was 137, which increased to 320 in the 2023–24 school year.
- In other words, while overall enrollment in online learning has gone down since the pandemic, participation rates for students identified as gender X increased compared to pre-pandemic levels, which also reflects a growing number of students each year who identified as gender X since data was first collected for that student group.

Race and Ethnicity

Race and ethnicity data offer insight into whether specific student groups had equitable access to online learning. Exploring the percentage of each population that accesses online learning makes it easier to see which individual groups are doing so at higher or lower rates than peers.

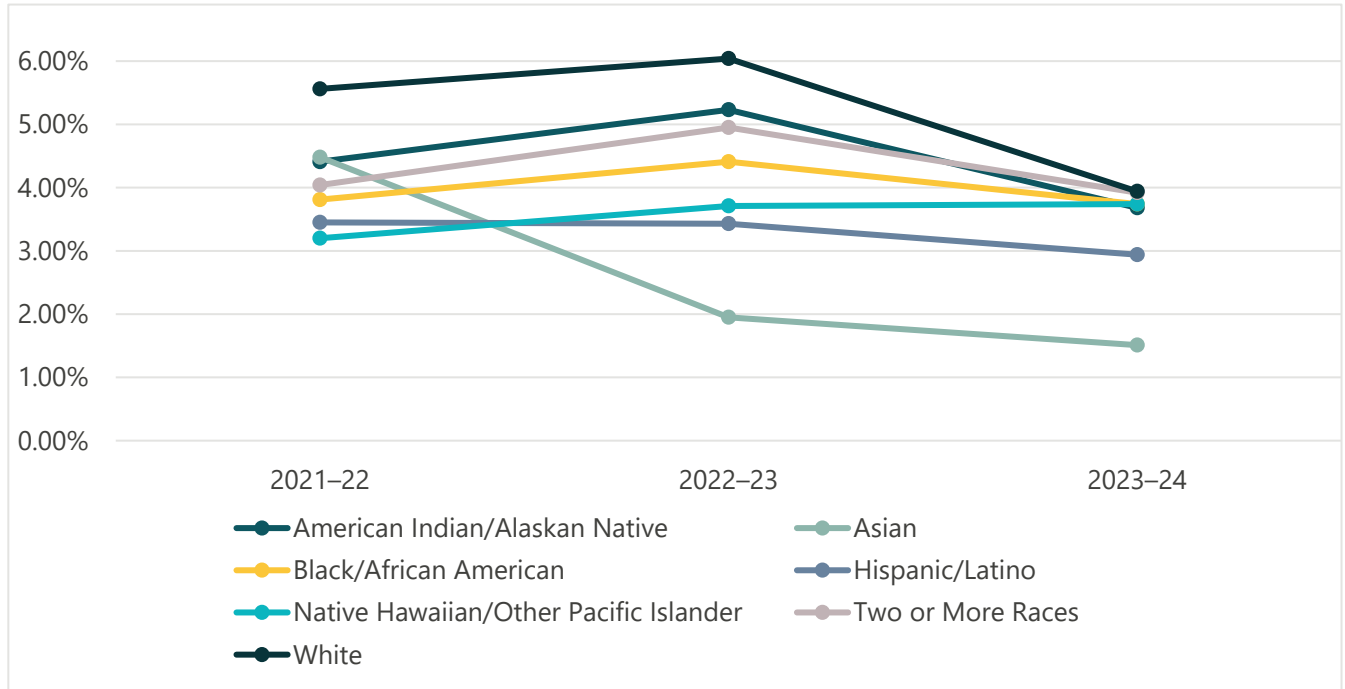
Like the data for gender, the race and ethnicity data below show two things: the percentage of students from each race/ethnicity enrolled in online learning out of the total population of that student group enrolled in public education overall (Figure 4a), and the percentages of students of each reported race/ethnicity who participated in online learning over the past three school years to explore trends over time (Figure 4b).

Figure 4a: Online Learning by Percentage of Student Group: Race/Ethnicity (2023–24)



Source: CEDARS, October 2024.

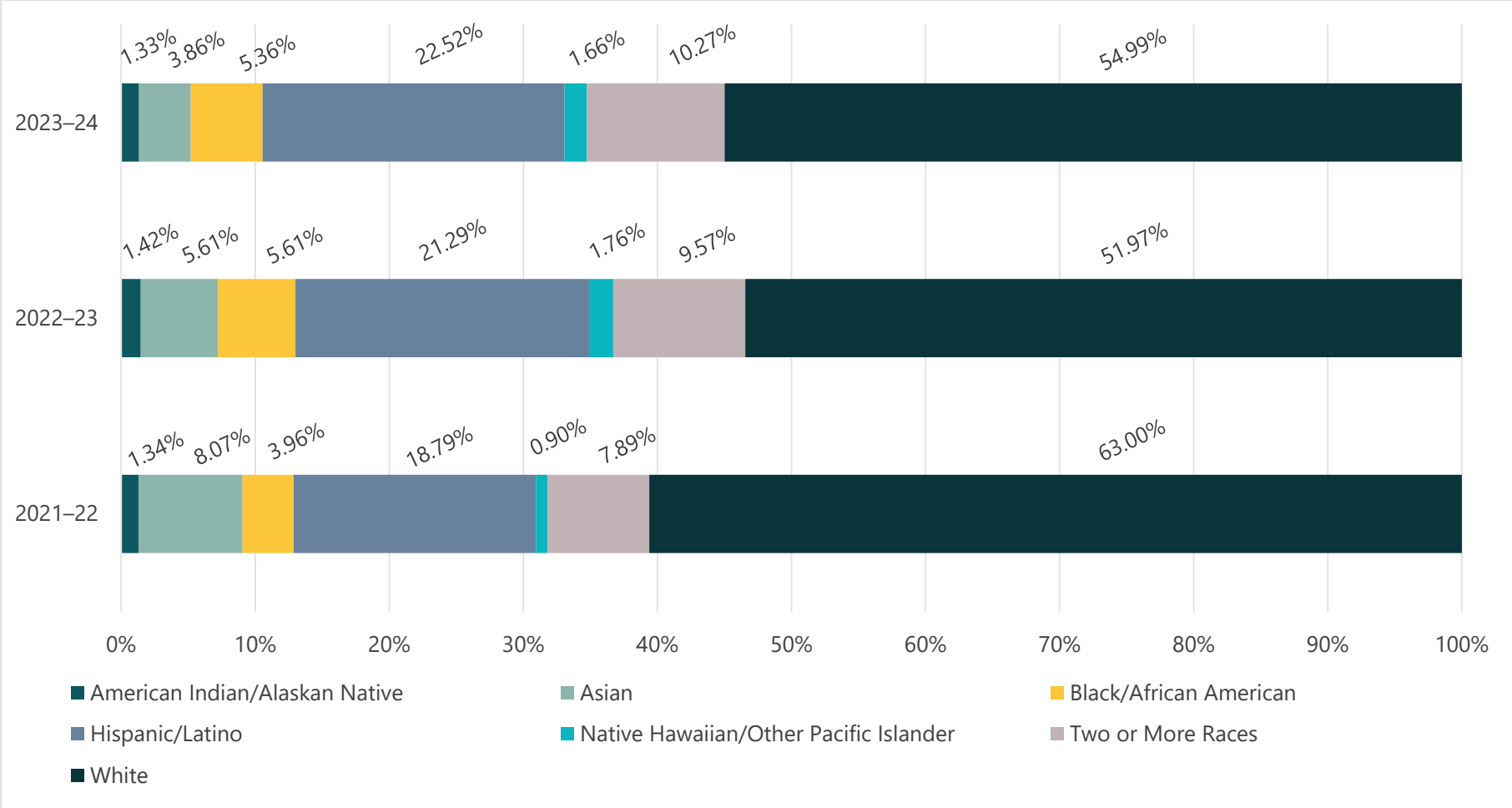
Figure 4b: Online Learning by Percentage of Student Group: Race/Ethnicity



Source: CEDARS, October 2024.

- In contrast to previous years, not only was 2023–24 the first year that white students accounted for less than half of all public education students in Washington state, but they also represented the largest drop in online course enrollment. Almost 12,000 fewer white students accessed online learning last school year than in 2022–23.
- American Indian/Alaskan Native students showed the second-largest drop in enrollment (247 fewer students than in 2022–23), followed by students reported as Two or More Races. In 2023–24, Asian students accessed online learning at the lowest proportional rate of any student group.

Figure 5: Online Learning Enrollment by Percentage of Race/Ethnicity Over Time

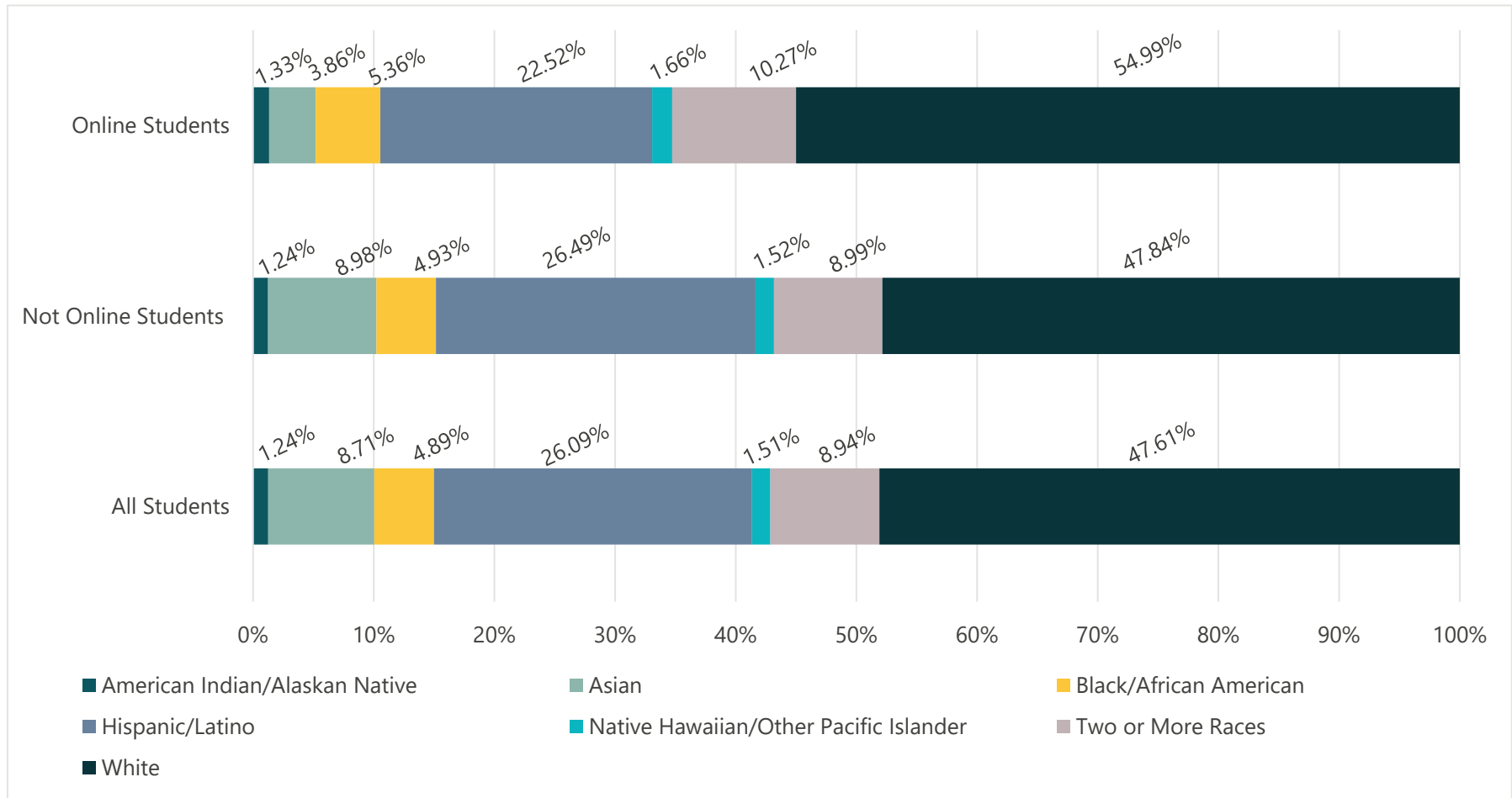


Source: CEDARS, October 2024.

Figure 5 shows three trends in online learning:

- Declining enrollment for white and Asian students,
- Rising enrollment for Hispanic/Latino students and students reported as Two or More Races, and
- Varying enrollment for Black/African American, American Indian/Alaskan Native, and Native Hawaiian/Other Pacific Islander students.

Figure 6: Online Learning Enrollment by Race/Ethnicity Comparison to Not Online Students and All Students (2023–24)



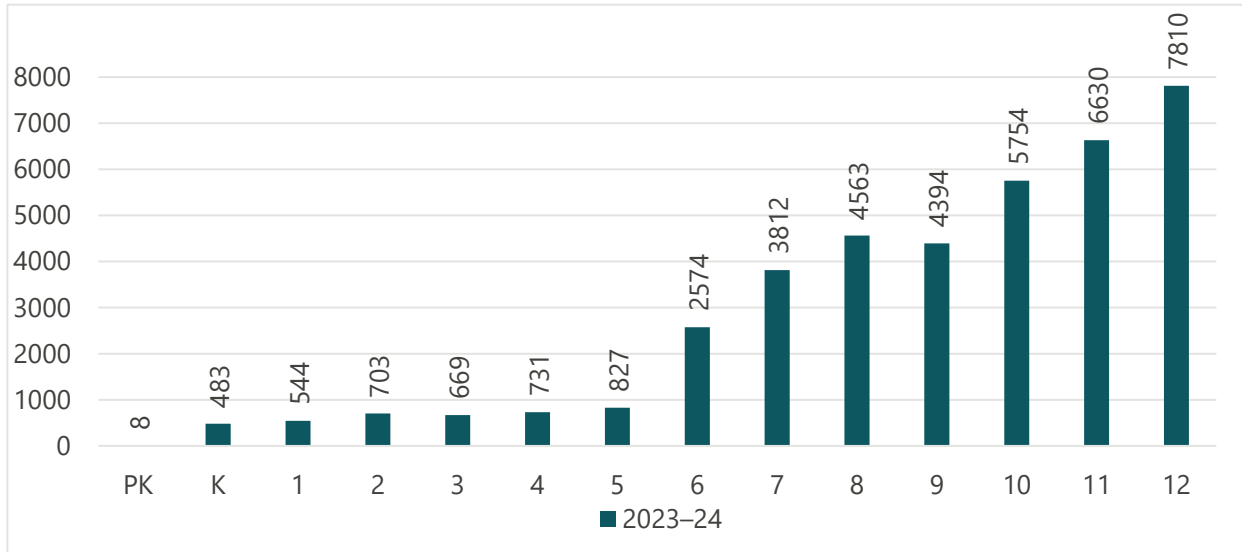
Source: CEDARS, October 2024.

- In 2023–24, nearly twice as many Asian students were enrolled in public education as Black/African American students (accounting for 8.71% and 4.89% respectively of all public school students per Figure 6) but Black/African American students accessed online learning at higher rates.
- In addition, Figure 6 shows that while white students made up less than half of all students enrolled in public education, they accounted for over half of all students accessing online learning.

Grade Level

Consistent with data from previous years, students were more likely to be reported in online learning beginning in grade 6 and growing from there.

Figure 7: Head Count of Students by Grade Level



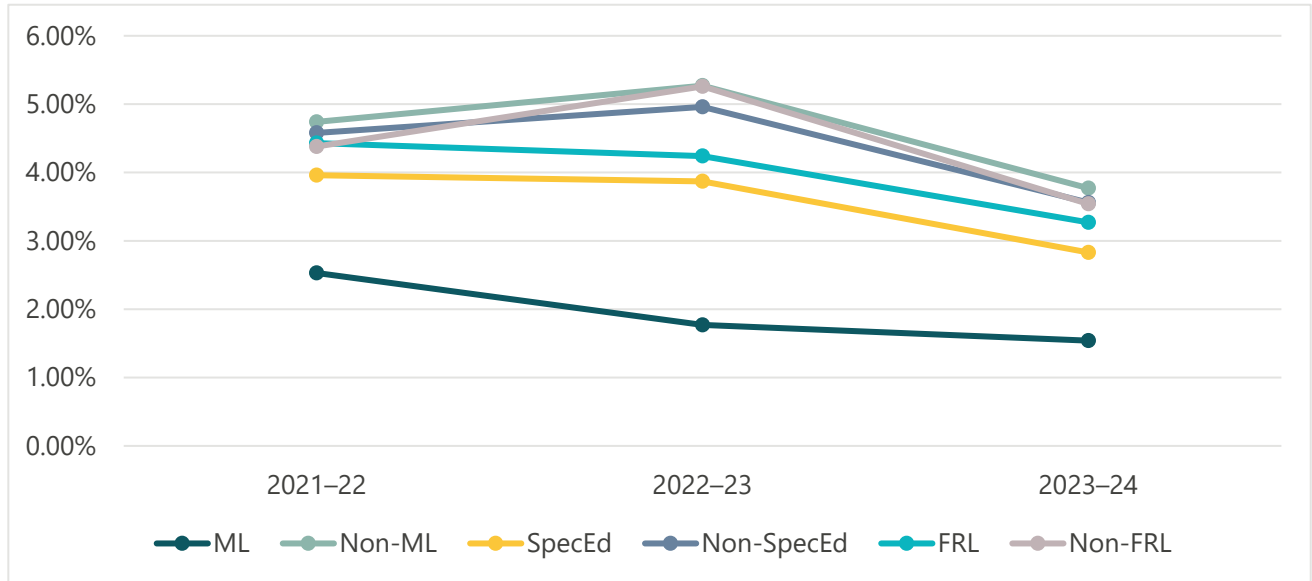
Source: CEDARS, October 2024.

Anecdotally, OSPI has heard that the reasons why there are so many more students participating online in high school are that many districts and schools have used online courses in later grades to supplement available courses and/or to make up courses for which students did not receive credit (including failed or incomplete courses). Additionally, older students often have an increased need or desire for flexible or remote learning.

Other Student Groups

OSPI also considered the percentage of students enrolled in programs or services which have specific criteria for students to qualify. This data helps predict whether individual student groups may be more or less likely to experience barriers to participation in online learning.

Figure 8: Percentage of Student Groups in Online Learning



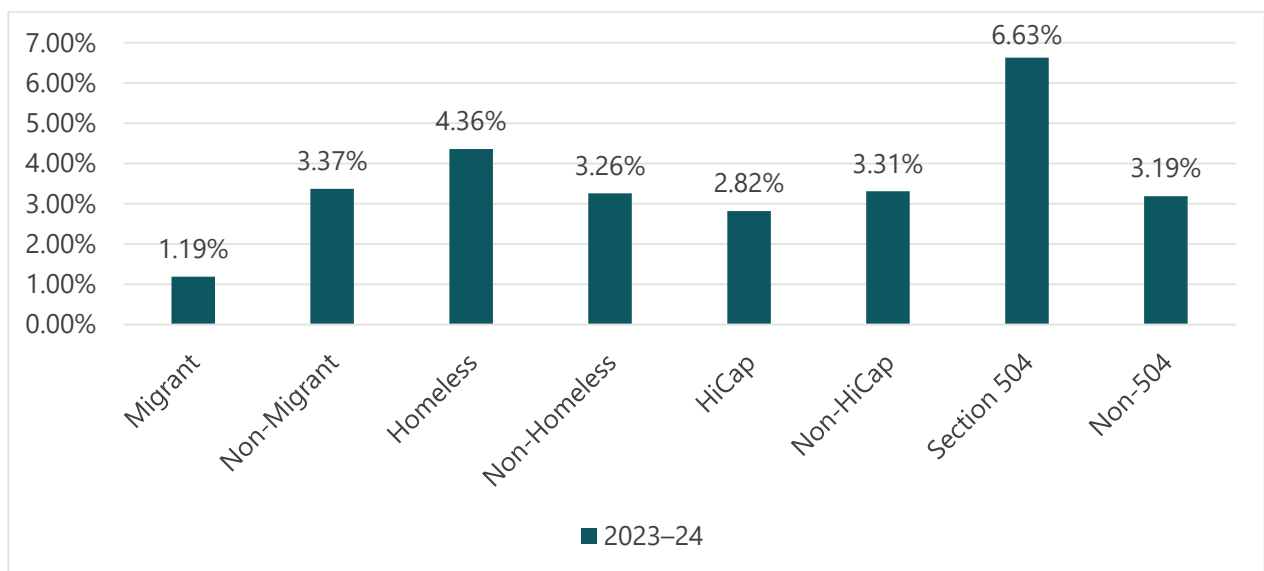
Source: CEDARS, October 2024.

- The data in Figure 8 show that Multilingual Learners (ML), just like in past years, continued to access online learning at lower rates, followed by students receiving special education (SpecEd) services and students qualifying for free- and reduced price lunch (FRL).

Other Student Groups Continued

This update to the Legislature is the first time that data for migrant students, students qualifying for McKinney-Vento services (i.e., “homeless,” lacking stable housing), students qualifying for Highly Capable services, and students with Section 504 plans in online learning are included.

Figure 9: Percentage of Additional Student Groups in Online Learning



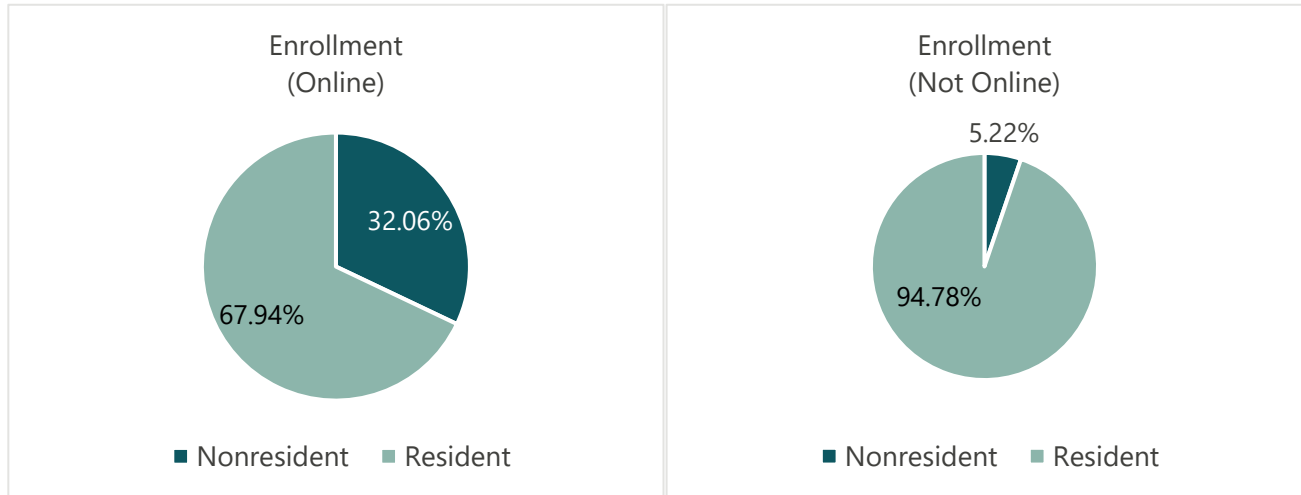
Source: CEDARS, October 2024.

Figure 9 shows that Migrant students and students qualifying for Highly Capable services were less likely to access online learning, whereas students on Section 504 plans and students qualifying for McKinney-Vento services (“homeless”) were more likely to access online learning than peers who did not qualify for these services.

Nonresident Students

“Nonresident students” are students who live outside of the boundaries of the district that they attend (in other words, students who transfer into a different school district than the one where they live). “Resident students” live within the boundaries of the districts they attend.

Figure 10: Enrollment by Nonresident and Resident Students (2023–24)



Source: CEDARS, October 2024.

The data in Figure 10 show a common trend in online learning: a higher likelihood of nonresident enrollment. In particular, in 2023–24:

- Over one-third of all students enrolled in online learning were nonresident students, and
- Only 5% of students not enrolled in online learning were nonresident students.

Since online learning offers more flexibility, allowing students to attend from greater distances or to access a different curriculum than their resident district uses (since not all school districts offer online learning), these numbers were not surprising. Further data analysis comparing online enrollment to other “choice” programs may be more apples to apples. The data further support the need to re-evaluate the multidistrict approval process and definitions capping nonresident enrollment at 10% for programs without multidistrict approval per RCW 28A.250.010(1)(b) and WAC 392-502-010(1)(i).

Measuring Success

CEDARS provides data on course completions and grades through “student grade history.” Grade histories are typically only submitted for students in grades 9–12, so course-based achievement data was not available (or tends to be very limited) for students in grades K–8. Transfer credits, which are often online courses taken privately outside of the standard school day or year, are not included in this report.

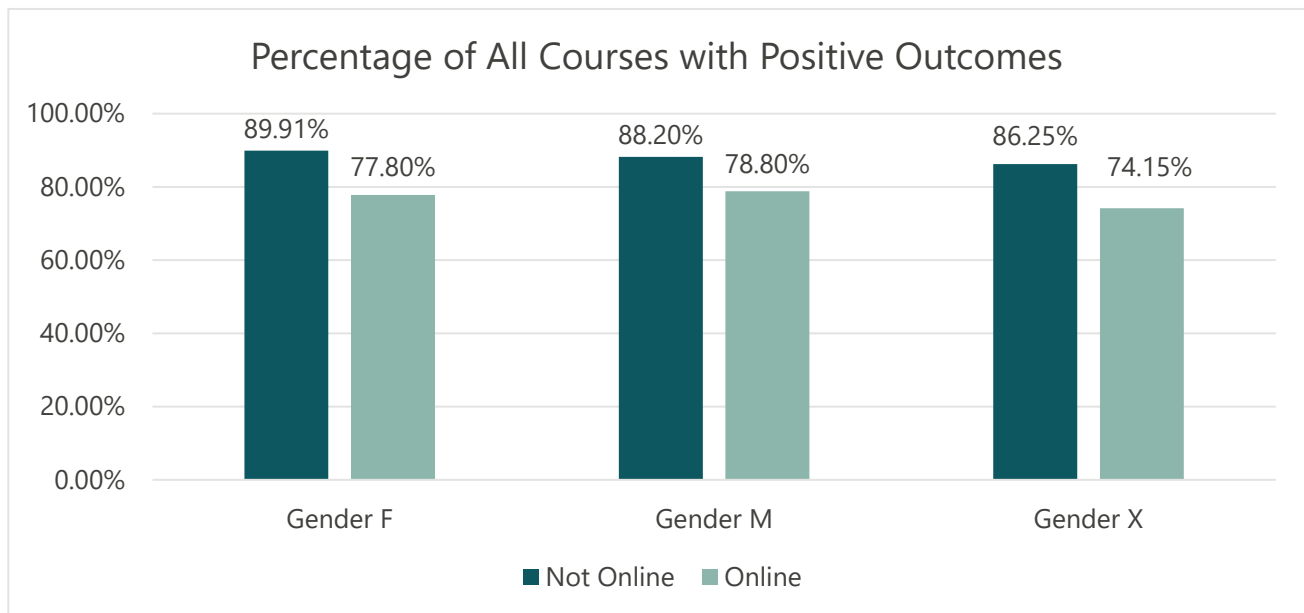
The following charts compare course success rates between courses that are designated as “online” and courses not given this designation (see p. 5 for the definition of “course success rate”).

Historically, online courses have had a lower course success rate than non-online courses, which continued to be the case in the 2023–24 school year. The assumption that performance should be equivalent is false for some of the same reasons that student demographics don’t match.

Anecdotally, this is often related to the population of students seeking online options who may perform lower in any setting. For example, students who choose online learning may have struggled over time in traditional settings or have other life events or needs that created barriers to in-person learning as well as focus on their academics. A real-life example is a student who struggles with anxiety and chooses to enroll in online learning. Online learning doesn’t make the anxiety they are experiencing go away, and it will continue to affect their success, but accessing online learning may allow them to engage more consistently.

Gender

Figure 11: Course Success Rate by Online Designation: Gender (2023–24)



Source: CEDARS, October 2024.

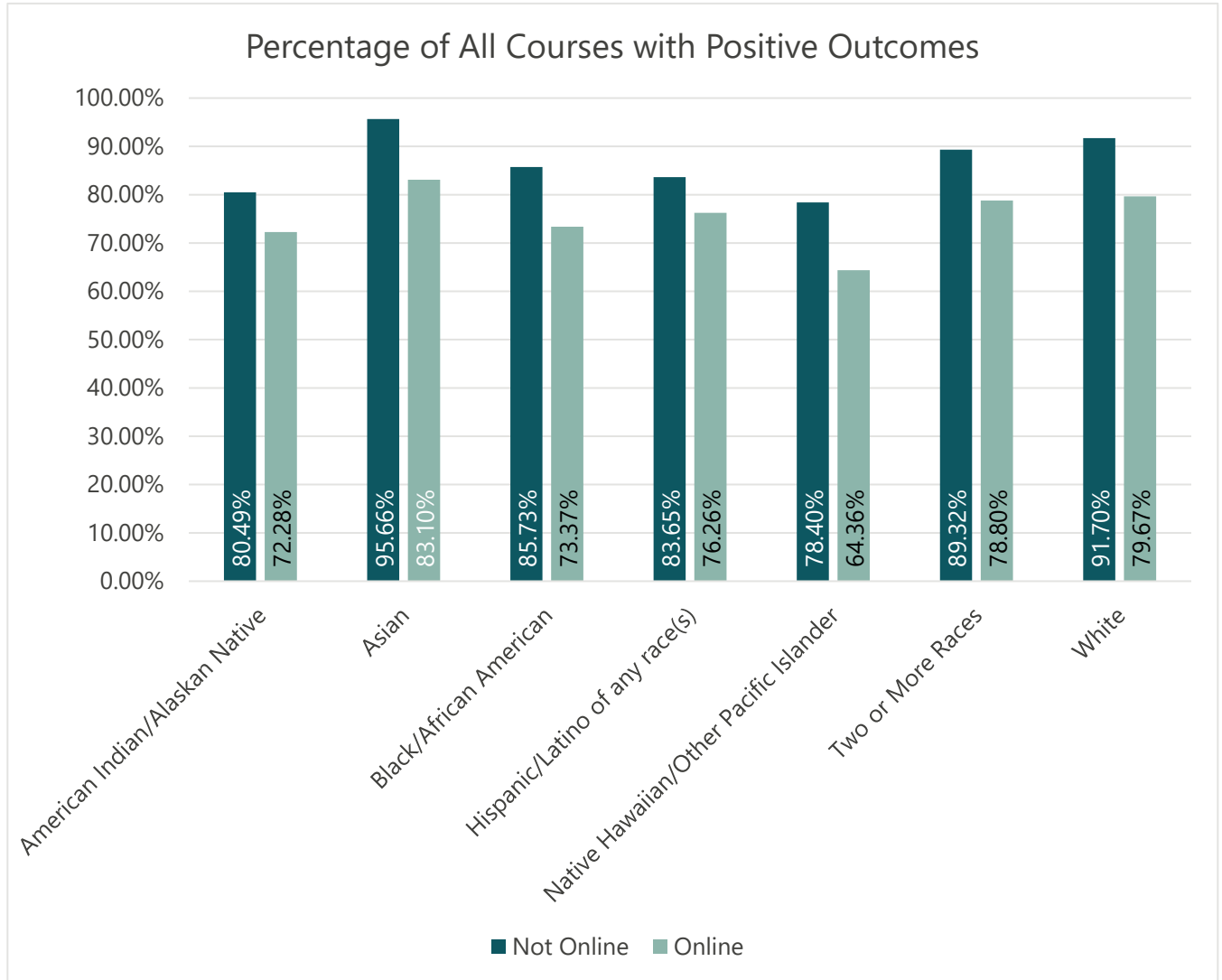
While students identified as gender X tended to participate in online learning at higher proportional rates than male or female students, Figure 11 shows they achieved fewer positive course outcomes both in comparison to male and female students in online learning as well as students identified as gender X enrolled in courses that were not online.

Since students identified as gender X were a much smaller student group than either male or female students and this report did not analyze individual student-level data but rather statewide trends, reasons for why this student group experienced these outcomes cannot yet be identified.

Race and Ethnicity

Data for course success rate by race and ethnicity gave additional context for understanding not only which student groups are accessing online learning but also which were doing so with the highest rates of success.

Figure 12: Course Success Rate: Race and Ethnicity (2023–24)



Source: CEDARS, October 2024.

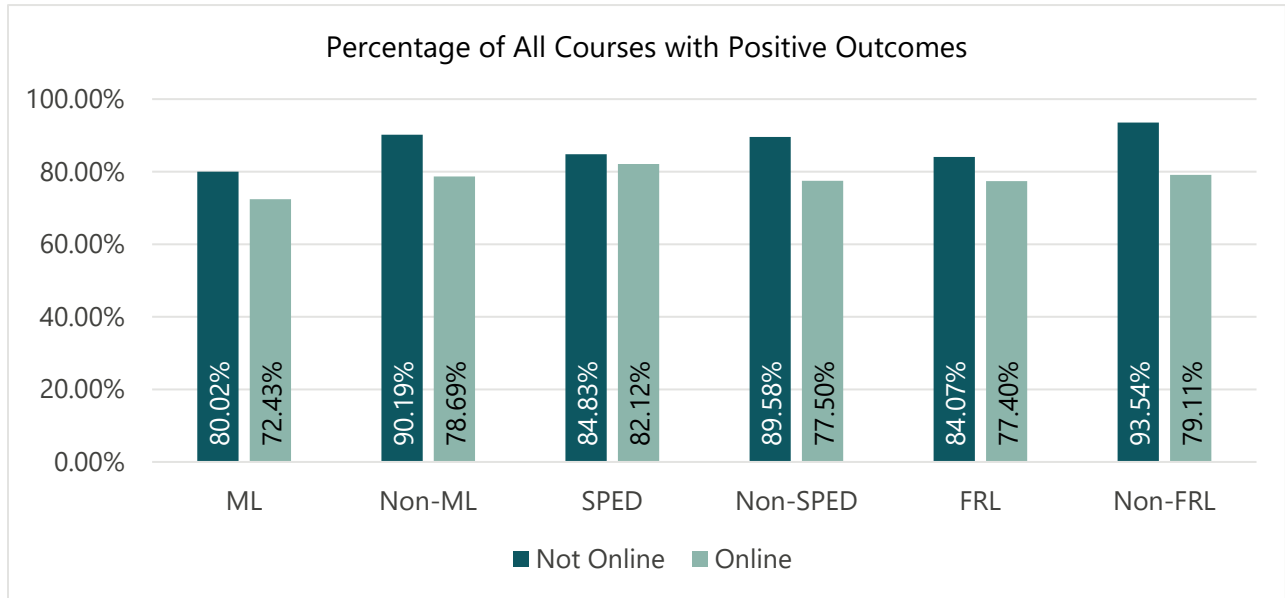
A few highlights:

- Asian students accessed online learning at lower rates than peers of other races/ethnicities but had higher rates of positive course outcomes than student groups of any other race/ethnicity.
- White students, while representing the sharpest drop in online enrollment of any student group, still had the second-highest course outcomes after Asian students.
- Native Hawaiian/Other Pacific Islander students and American Indian/Alaskan Native students, the two student groups that experienced the lowest course success rates in overall, saw this trend mirrored in online settings.

Other Student Groups

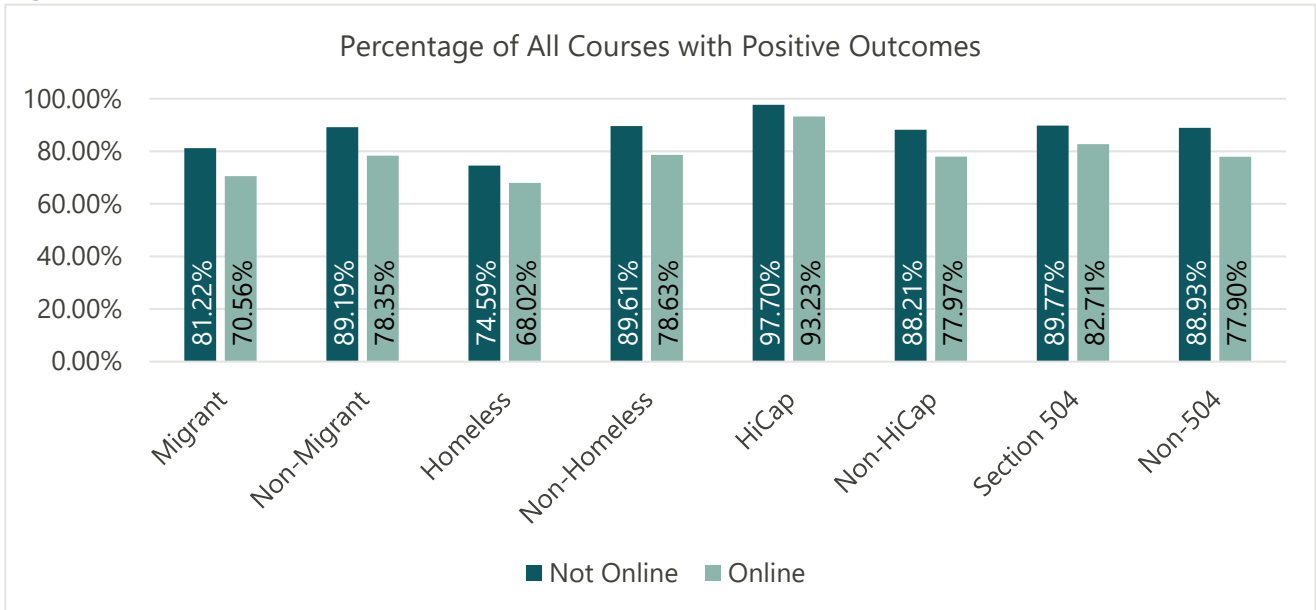
Breaking down the data by individual student groups provided additional insights about equitable access and the extent to which online learning met students' needs.

Figure 13a: Comparison of Positive Course Outcomes: Other Student Groups (2023–24)



Source: CEDARS, October 2024.

Figure 13b: Comparison of Positive Course Outcomes: Other Student Groups (2023–24)



Source: CEDARS, October 2024.

Figure 13a shows that the gap narrowed between students receiving special education services in online settings versus those who were not online in terms of positive course outcomes, especially compared to findings in last year's Update to the Legislature.

There was also a smaller gap between positive course outcomes for students receiving free- and reduced-price lunch (FRL) and students qualifying for McKinney-Vento services (students experiencing homelessness) who took online courses versus students who received FRL or qualified for McKinney-Vento services who did not take online courses.

Again, it would be difficult to speculate about why some specific student groups seemed to be more successful in online learning than others.

CONCLUSION & NEXT STEPS

Reported student enrollment in online learning dropped almost to pre-pandemic levels in the 2023–24 school year despite more schools than ever before offering online learning.

Districts' confusion about definitions of online learning and online courses continued to center on three themes:

1. When online courses overlap with other types of Alternative Learning Experiences (ALEs) that include hybrid models of instruction (e.g., part online, part site-based).
2. When online courses are delivered on-campus, such as students attending an online course in a computer lab or other classroom that may be supervised by district staff, but the supervising teacher of the class is located elsewhere.
3. How increased use of technology and digital curricula, activities, and assignments in all learning environments makes the RCW definition of "online course" either less distinct or applicable to more courses.

These themes reflect opportunities to increase communication and technical assistance and evaluate existing approval and collection processes to increase efficiency.

OSPI has received feedback about systemic barriers posed by the current approval process for districts that wish to become multidistrict online providers. OSPI recognizes the need to update the multidistrict approval process and is working to put changes into place. Agency staff are exploring ways to update and clarify the definitions of "online course" and "multidistrict online provider" to remove reported barriers to opening or expanding multidistrict online school programs, which will likely require legislative action.

OSPI has shared reporting expectations with districts and regularly analyzes CEDARS data for online programs and course providers to ensure compliance with state law and applicable regulations. Guidance on CEDARS fields for online courses and providers has led to more conversations around online learning and the approval process. OSPI seeks to update its reporting guidance for online learning to improve data collection and quality moving forward.

APPENDICES

Appendix A

Figure 14: Online Learning Demographics

Student Group	Online Headcount	Total Headcount	Percent of Student Group Participating in Online Learning
All Students	39,455	1,157,696	3.41%
Gender F	20,631	550,531	3.75%
Gender M	18,514	588,008	3.15%
Gender X	320	4,691	6.82%
White	21,713	551,178	3.94%
Hispanic/Latino of any race(s)	8,893	302,090	2.94%
Two or More Races	4,055	103,515	3.92%
Asian	1,524	100,862	1.51%
Black/African American	2,118	56,629	3.74%
Native Hawaiian/Other Pacific Islander	654	17,494	3.74%
American Indian/Alaskan Native	527	14,305	3.68%
Multilingual Learners	2,602	169,506	1.54%
Non-Multilingual Learners	36,877	977,347	3.77%
Special Education	4,978	176,105	2.83%
Non-Special Education	34,497	968,845	3.56%
Section 504	2,618	63,394	4.13%
Non-Section 504	36,880	1,083,147	3.4%
Free and Reduced Priced Lunch	18,818	575,284	3.27%
Non-Free and Reduced Priced Lunch	20,824	588,648	3.54%
Migrant	471	24,622	1.91%
Non-Migrant	38,984	1,118,036	3.49%
Homeless	1,722	48,464	3.55%
Not Homeless	37,751	1,097,597	3.44%
Highly Capable	1,113	84,158	1.32%
Non-Highly Capable	38,351	1,061,266	3.61%
Part-Time Home-Based Instruction	243	3,099	<1%

Source: CEDARS unique students with one or more online course reported in student schedule or grade history for the 2023–24 school year as of 10/31/2024.

Appendix B

10% Nonresident Cap: Impact and Implications

The tables below each set of scenarios provide visual representations of the data as described in each scenario.

Impact: District A

- **Scenario 1:** District A, a rural district with 40 District A students in its online school program, admits four nonresident students (from other districts) into the online school program. District A has not gone over the 10% cap, so there is no risk of audit findings related to nonresident enrollment limits that could require it to give back state funding.
- **Scenario 2:** District A admits one new nonresident student. Since 10% of 40 students equals four students, admitting a fifth nonresident student places District A at risk of audit findings, even if it has capacity (e.g., staffing, materials, etc.) to serve the student.
- **Scenario 3:** If eight District A students left its online school program, District A would suddenly be over the cap by one nonresident student and could face audit findings.

Table 2: District A and Nonresident Enrollment: Impact on Possible Audit Findings

	Total in Online School Program	Resident Students	Nonresident Students	Out of Compliance
Scenario 1	44	40	4	No
Scenario 2	45	40	5	Yes
Scenario 3	44	32	4	Yes

Impact: District B

- **Scenario 1:** District B, an urban district with 600 District B students enrolled in its online school program, admits 45 nonresident students into its online school program.
- **Scenario 2:** District B can admit 15 more students into its online school program before exceeding the 10% cap that would risk possible audit findings.
- **Scenario 3a-b:**
 - a) Even if 145 District B students left its online school program, District B still would not exceed the 10% cap if only 45 nonresident students were enrolled.
 - b) In this scenario, District B would exceed the 10% cap if it was still serving the 15 additional students from Scenario 2, since 10% of 515 students is 51.5.

Table 3: District B and Nonresident Enrollment: Impact on Possible Audit Findings

	Total in Online School Program	Resident Students	Nonresident Students	Out of Compliance
Scenario 1	645	600	45	No
Scenario 2	645	600	60	No
Scenario 3a	500	455	45	No
Scenario 3b	515	455	60	Yes

Other Considerations

- The original process to identify the “10%” threshold needs to be reassessed in the context of current school choice enrollment.
- Other flexible and asynchronous learning models do not require OSPI approval including Site-based courses, remote ALE courses, and Running Start courses offered online.
- OSPI has concerns about anecdotal cases where districts interpreted this cap to mean that they were required to unenroll nonresident students solely because resident enrollment dropped, which would add unnecessary volatility to enrolled students.
- Nonresident enrollment in all programs varies, with many schools that are not online school programs exceeding a 10% nonresident enrollment rate. Examples include Alternative Learning Experience (ALE) programs, magnet schools, choice or alternative schools, and schools with smaller class sizes or more course offerings. Location of schools also can impact nonresident enrollment.
- There is no threshold on the other end, allowing some schools to serve entirely nonresident students.

Next Steps

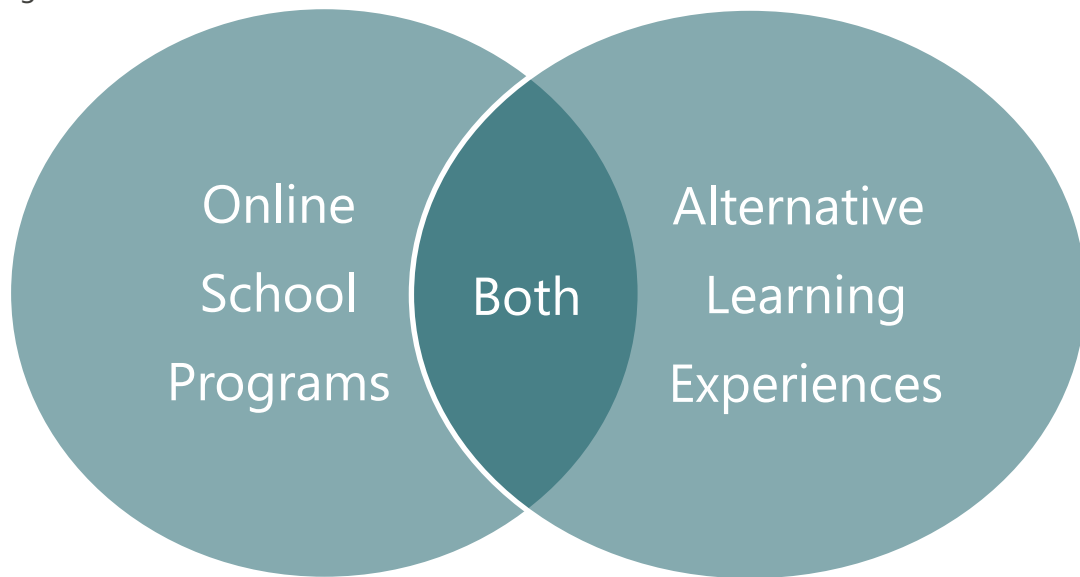
- OSPI’s Learning Options department wants to utilize nonresident enrollment as a factor for agency identification and analysis on which schools and districts need more regular oversight, reviews, and support to ensure quality programming. This approach could be applied to all settings, not exclusive to online learning, and districts would retain local control to develop relevant learning options while maintaining accountability to high quality, rigorous programs that provide more options for school choice.

Appendix C

Feedback on Definitions: “Online Course” and “Multidistrict Online Provider”

Online School Programs and ALEs: Overlap

- A critical point is that not all ALEs are online school programs, and not all online school programs are ALEs.
- Many programs fall into the middle category, where there is an overlap between ALEs and online school programs. However, many other programs are either ALEs or online school programs, but not both.



Online Course: Definition and Impacts

In a 2019 OSPI work group that explored updates to definitions of online learning, participants considered not only the definition of “online course” but also the three course types used by online school programs and ALEs: remote, site-based, and online.

Participants noted how difficult it was for staff in charge of enrollment reporting to accurately determine which course type applied when there was overlap: for example, courses delivered online that also required on-campus participation.

Below, the definition of “online course” is broken into its subsections. Beneath the subsections are feedback and/or considerations that OSPI received anecdotally from districts and programs or which were provided by the 2019 OSPI work group.

- **(i) More than half of the course content is delivered electronically using the internet or other computer-based methods;**
 - The definition is especially broad considering the rapid evolution of technology and the frequent use of electronic tools in most classrooms, including traditional brick-and-mortar schools (e.g., Internet as a research tool, Google Classroom, Canvas).
 - While the teacher being remote is unique to online and ALE courses, many

- electronic tools are now common in traditional settings.
 - Many high schools contract with approved online course providers to offer credit recovery or credit retrieval options for students who either failed or still need to complete classes for credit, which often take place on-site during the school day.
 - OSPI has received questions from schools concerned about needing online school program approval, particularly regarding the "more than half of the course content" component. Some schools, especially ALEs, may use outdated or less efficient resources that do not involve the internet or computers as a way to avoid the "online" status.
 - Feedback indicates that in mastery-based and other student-centered models, "half" is difficult to quantify when students work on different projects or have varying needs for accessing instruction.
- **(ii) More than half of the teaching is conducted from a remote location through an online course learning management system or other online or electronic tools**
 - Online learning refers to "teaching" and ALE rules refer to "instructional time," which can make these definitions more challenging when programs are navigating both overlapping sets of rules.
- Work group participants wondered:
 - What the meaning of "teaching" is as referenced in this definition, and when the school is also an ALE, whether this refers to direct instruction or to instructional contact time. The latter is referred to in the context of the teacher's responsibility for the course, not whether it is part of the percentage of time when teaching is remote.
 - Where emails and text messages would fall on the spectrum of "electronic tools" and how these tools were counted in terms of instructional time. If teaching only exceeded the "more than half" metric because of emails and texts, some programs which currently do not have online school program approval might need to seek it.
 - Whether a distinction should be made between smartphones and land line phones.
 - Whether this calculation was based on total instructional time delivered online or the percentage of a student's full courseload (schedule).

Multidistrict Online Provider: Definition

- A "multidistrict online provider" as defined in RCW 28A.250.010(1) is either:
 - A private or nonprofit organization that contracts with one or more school districts to provide online courses or programs to K–12 students from one or more school districts, or
 - A school district that provides online courses or programs to students who reside outside the geographic boundaries of the school district.
- This definition is separate from "online provider," defined in subsection (3) "as any provider of an online course or program, including multidistrict online providers, all school district online learning programs, and all regional online learning programs."
- Both of these definitions are separate from "online course provider," defined in [WAC 392-502-010](#)(4) as "an online provider that offers individual online courses that are not delivered as an online school program."

Multidistrict Online Provider: Impact

- Washington state law blends third-party vendors together with public school districts in its definitions of "multidistrict online provider," "online provider," and "course provider."
- Four districts currently have multidistrict online school program approval and online course provider approval in Washington state.
- The interchangeable use of definitions in both RCW and WAC creates confusion around reporting practices and accountability requirements, impacting data quality. Since the definitions appear in RCW, updating WACs alone is insufficient for clarifying the differences and requirements of each definition in terms of reporting and accountability.

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