

# Enrollment Policies and Practices

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# Agenda

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2. [Pre-Admission Materials](#)
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# Components of Enrollment Policy

- [Anti-Discrimination Statement](#)
- [Enrollment Eligibility](#)
- [Enrollment Process and Timelines](#)
- [Selection Process](#)
  - Lottery vs. waitlist
  - Optional priority enrollment
  - Optional weighted lottery
- [Students with Disabilities](#)



# Anti-Discrimination

- An institute charter school cannot discriminate on the basis of disability, race, creed, color, sex, sexual orientation, national origin, religion, ancestry, or need for special education services.
  - Nondiscrimination extends to recruiting and marketing practices

C.R.S. 22-30.5-507(3).



# Enrollment Eligibility

- Enrollment in an institute charter school shall be open to any child who resides within the state
  - except that an institute charter school shall not be required to make alterations in the structure of the facility used by the institute charter school or to make alterations to the arrangement or function of rooms within the facility, except as may be required by state or federal law
- Age Eligibility
  - Free public education is available to students age 5-21 who have not yet graduated the 12<sup>th</sup> grade
  - Kindergarten: The charter school should have a clear age eligibility date
  - 1<sup>st</sup> Grade: The charter school should have a clear age eligibility date



# Enrollment Eligibility

Additional grounds for denial of admission:

- Having graduated from 12<sup>th</sup> grade
- Having been expelled from school in preceding 12 months

C.R.S. 22-33-106



# Sample Non-Discrimination/Eligibility Language

- *SCHOOL welcomes all students and strives to create and maintain a diverse student population. Enrollment in SCHOOL is open to all students residing in the state. Student recruitment and enrollment decisions shall be made in a nondiscriminatory manner as outlined in C.R.S. § 22-30.5-507(3). In all cases, student recruitment and enrollment decisions shall be made without regard to disability, race, creed, color, sex, sexual orientation, national origin, religion, ancestry, need for special education services, or any other protected class.*
- *SCHOOL serves grades K-5. To enroll, students must meet the appropriate age requirements set forth by state law and school policy. To be eligible for Kindergarten enrollment, students must be at least 5 years old on or before September 1 of the enrollment year. The School may approve enrollment of students eligible for Early Access in accordance with state law.*
- *To be eligible for 1<sup>st</sup> Grade enrollment students must be at least 6 years old on or before September 1 of the enrollment year.*



# Enrollment Process and Timelines

- When, where, and how is enrollment advertised?
- What are the timelines?
  - Keep generic timelines
- What is the process for current students?
- Is information accessible to all current and prospective families?
  - Consider barriers to access such as language and resource/technology availability





# Sample Enrollment Process and Timelines Language

*Each year, SCHOOL will establish and make publicly available an Enrollment Timeline. Families seeking to enroll must submit a completed Letter of Intent form by the deadline set forth in the Enrollment Timeline for enrollment in the subsequent school year. SCHOOL will use a variety of means to promote its enrollment process. The Enrollment Timeline, Letters of Intent forms, and instructions for submission of Letters of Intent will be posted on the SCHOOL website during the fall of the preceding school year. SCHOOL will also use social media, community partnerships, parent newsletters, and other sources to promote the enrollment process. All communication and enrollment material will be available in both English and Spanish [or whatever need is].*

- Option to include a general deadline, such as “the first Monday in April,” for example. Listing a specific date (e.g., April 1) can be problematic when that date falls on a weekend.
- The Enrollment Timeline should also account for existing students seeking to re-enroll.



# Additional Considerations

- Cannot establish undue barriers to enrollment that have the effect of excluding students based on socioeconomic, family, or language background, prior academic performance, special education status, or parental involvement.
  - Mandated testing
  - Mandatory parent information nights
- Question to ask: Would the practice have the effect of excluding students based on socioeconomic, family, or language background, prior academic performance, special education status, or parental involvement?
  - Examples and hypotheticals



# Selection Process

- Must admit students through a publicly verifiable selection process that is either random (lottery) or first-come-first-served (waitlist). 1 CCR 301-88.
- If using Lottery Process, consider addressing:
  - Instances in which lottery is used
    - *If the number of Letters of Intents exceed the number of available seats by the Letter of Intent deadline, a lottery will be used to determine the placement of students for any grade level for which the Letters of Intent exceed capacity.*
  - Where/when lottery is held
    - *The enrollment lottery will be held in public at the school on the date set forth in the enrollment timeline.*
  - How is the lottery conducted
    - *All students who are of eligible age and have timely submitted a Letter of Intent will be entered into the lottery. On the day of the lottery, students are assigned random numbers. A random number generator is used to select students to ensure equality.*
    - *Once offers are made to students applying for grade levels with sufficient seats available, then names will be drawn, beginning with the highest grade level offered by the school requiring a lottery.*
  - Whether current students must submit a LOI
    - *Current students are automatically re-enrolled and do not enter the lottery provided they submit a Letter of Intent by the deadline set forth in the Enrollment Timeline.*



# Selection Process: Lottery

- Process for contacting selected families
  - *Once a student is selected, either via lottery or from the waitlist, SCHOOL will attempt to contact the family using the contact information provided on the Letter of Intent on the same day as the lottery or draw from waitlist. If the family cannot be reached on the same day, SCHOOL will continue to attempt to contact the family for the next four business days. If the family cannot be reached during that time, they will forfeit their child/children's enrollment and the child/children will be placed at the bottom of the wait list. Notification to families will be made in the preferred language or mode of communication indicated on the Letter of Intent.*
- Process of placing non-selected students on waitlist
  - *Students not selected via lottery will be randomly placed on a waitlist based on the student's randomly generated lottery number. 14 days following the lottery, available seats will be offered to the prospective students at the top of the waitlist. Upon notification of admittance, families will have four business days upon verbal notification to accept the position. SCHOOL will attempt to contact the family for only four business days.*
  - **Whether you continue to accept students after Pupil Count Day**
    - *SCHOOL will continue to enroll students from the top of the waitlist as positions become available throughout the year.*
    - *After the October Pupil Count Day, no new students will be enrolled in the school.*
    - *SCHOOL's annual calendar is based on four quarters, intentionally designed to allow more frequent points of entry for students. If space is available, students may enroll in any of the quarters in accordance with the timelines set forth in the Enrollment Timeline.*
  - **Address whether Letters of Intent carry year-to-year or whether a new LOI must be submitted**



# CCSP Look For's

- Procedures must be well-articulated and supervised
- Must be evidence of marketing to a wide sector of population (considering mode, language, and accessibility)
- Window for open enrollment with a close date and annual lottery date
- Must have means by which selection will be communicated and response time



# Priority Enrollment

If receiving CCSP Grant:

- Must use lottery if more students apply than seats
- Priority can be granted to:
  - Siblings of already admitted students
  - Children of founders, teachers, and staff
    - Cannot exceed 20% of total enrollment
    - Required tasks/hours must be completed prior to school's opening
    - If desired, can add years of service for staff priority
- Lottery cannot provide preference based on gender
- Look For's:
  - Clearly define "siblings"
    - Custody or extended relationship
  - Clearly define "founders"
    - Hour requirements and cut-off dates
  - Clearly define "staff"
    - Full-time vs. part-time



# Sample Priority Enrollment Language

*Selected groups of students will be granted priority enrollment, in the following order:*

- 1. Siblings of currently enrolled students, which includes children whose primary guardian(s) are also the primary guardian(s) of other children already enrolled in the program (in the case of joint custody, primary guardians must have custody at least 50% of the time). This could include half-siblings, step-siblings, adopted siblings, cousins, nieces, or nephews being cared for by grandparents, etc.;*
- 2. Children of Founding Families, which includes children of the founding school team who completed at least thirty hours of volunteer work with SCHOOL prior to the date by which Letters of Intent are due for Year 1 enrollment;*
- 3. Children of School Employees, which includes children of staff or faculty members that work at least half-time, have full or joint custody of the child, and who started work on or before the first day of school of the year in which they are submitting the application.*

*In no case shall categories 2 and 3 exceed 20% of total enrollment.*



# Enrollment Preferences for Non-CCSP

- Generally, a school not receiving CCSP funds may consider additional preferences or lottery weights provided that they do not have the effect of discriminating against a protected class or are otherwise prohibited by state or federal law.
- What about preference for students with a specific educational background? Preference for a specific community?
- Considered on a case-by-case basis





# Pre-K to K Enrollment

- Cannot have preference from a private program feeding into the public.
  - Can allow early lottery (e.g., allow families up to 2.7 years prior to entrance to enter lottery)
  - Lottery must be open to all prospective students, not just those enrolled in pre-k
  - Lottery/enrollment cannot be contingent upon students enrolling in the pre-k
  - A reasonable percentage of seats must be reserved for students that may not attend the pre-k, are uninformed, or are new to the area
- Basically the same whether you are receiving CCSP or not



# Weighted Lottery

... if receiving CCSP Grant:

- Weighted lotteries can be used for following subsets:
  - Economically disadvantaged;
  - Students with disabilities;
  - Migrant students;
  - Limited English proficient students;
  - Neglected or delinquent students; or
  - Homeless students.
- Weighted lotteries should be used as part of a broader strategy to recruit and retain all students, including educationally disadvantaged students, as opposed to creating a school exclusively to serve a particular subset of students.



# Weighted Lottery

. . . If receiving CCSP Grant:

- Weighted lottery must present a rationale for its weight plus its goal.
  - e.g., the goal of the School is to increase the School's population of students eligible for Free or Reduced-Price Lunch to 50% of total student population in order to be more comparable to the demographics of the local school districts, which is comprised of approximately 50% FRL
- Set forth formula for reaching that goal
  - SCHOOL will weight students eligible for Free or Reduced-Prince Lunch at 3:1 relative to non-FRL students.
- If for purposes of a weighted lottery, can gather the info prior to admission



# Sample Weighted Lottery Language

*In order to serve a diverse student body, cultivate respect for and interest in human diversity among students, and have a student population which reflects the geographic region. It is the School's goal to serve approximately 25% ELL and 40% FRL. To reach this goal, SCHOOL will use a weighted lottery for enrollment selections. The lottery will place a weight of "3" to the following educationally disadvantaged student subsets described under section 1115(b)(2) of ESEA which include:*

- a. English Language Learners; and*
- b. Economically Disadvantaged PK-12 students who qualify as FRL students.*

*Educationally disadvantaged students will be selected by information provided on the Intent to Enroll forms submitted to the school and by conversations with the parents. For the first year of the weighted lottery, every current and former second language learner will be given a weight of "3" in the lottery. For the following school year selection, the Intent to Enroll forms will also collect financial information and students who qualify for free and reduced lunch will be added to the weighted lottery with a weight of "3" also.*

*The weight in this lottery may be revised to accommodate for emergent circumstances and will never be used to exclusively serve any particular population.*



# Selection Process: Waitlist

- School can have a first-come-first-serve waitlist process
- Process should address:
  - When School will pull from waitlist (throughout year vs. up to October Count)
  - When does waitlist reset, if ever?
  - Similar post-admittance processes as apply to the lottery process



# Students with Disabilities

- Students with disabilities must have equal access to apply
- All pre-admissions materials cannot ask about disability
  - Letter of Intent or any other pre-admission forms
  - Cannot require IEP or 504 Plan prior to admission
- After a student is admitted, then School can proceed with collecting IEP or 504 Plan, convening review team, etc.
- See CSI Enrollment Procedures for Students with Disabilities



# How do you know if your practices are discriminatory?

- Review the data
- Listen to communications of front office staff





# Pre-Admission Materials

## Letter of Intent

CAN Request	CANNOT Request
Name	Disability status (unless for weighted lottery as set forth above)
Age	Citizenship/immigration status
Address	Other status as one of the educationally disadvantaged subgroups if not for purposes of weighted lottery
Current school	
Particular educationally disadvantaged subgroup but only if for purposes of weighted lottery*	





# Registration Materials

- *Plyler v. Doe (1982)*: Public schools must enroll and educate students regardless of immigration status/citizenship. You cannot deny admission to a student based on lack of records.
- *McKinney-Vento Act*: Qualifying students must be immediately enrolled in school even if they lack typically-required documentation (birth certificate, immunization records).
- **Moral of Story**: Ensure that the registration materials do not have a “chilling effect” on the enrollment of individuals who identified with a particular protected class or classes



# Registration Materials

## Proof of Residency:

- Can request phone or water bill, lease agreement, affidavit in lieu of other formal documentation
- Cannot ask about citizenship or immigration status
- Cannot require a parent's state ID or driver's license

## Proof of Age

- Can request religious, hospital, or physician's certificates; adoption record; parent affidavit; birth certificate; previously verified school records
- Cannot prohibit enrollment due to lack of birth certificate or due to a foreign birth certificate



# Registration Materials

## Social Security Numbers

- If requesting, must (1) inform the family that the SSN is provided voluntarily and refusal to provide one does not bar enrollment; and, (2) explain why the SSN is needed and how it is used
- Cannot require SSN for either the student or the parent

## Race/Ethnicity Data

- Can request race/ethnicity data for purposes of state/federal reporting
- Cannot be a bar to enrollment

## Disability Status

- Cannot ask about disability status prior to admissions unless it is used for purposes of a weighted lottery or if the school is chartered to serve the needs of students with a particular disability
- After student is admitted, can ask for prior IEPs and 504 Plans but failure to provide them is not a bar to enrollment



# Registration Materials

Cannot charge a registration fee

Commonly-requested documents:

- Proof of Age
- Immunizations
- Home language survey
- Prior transcripts/records

Thank you!

# Questions?

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