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**From:** Bryce Adams <badams@connectionseducation.com>  
**Subject:** Connections Academy 277-419-9 Feedback  
**Date:** November 3, 2014 10:20:15 AM CST  
**To:** 'natalie.grange@schools.utah.gov' <natalie.grange@schools.utah.gov>  
**Cc:** Linda Harless <LHarless@connectionseducation.com> , Jennifer Dukek <jdukek@connectionseducation.com>

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Hi Ms. Grange,

Linda Harless, Principal of Utah Connections Academy, asked us for feedback regarding these new rules, which from what I understand went into effect 10/10/14 but may be revisited in the future. We'd like to respectfully submit the following comments to the regulations which, if accepted, we believe would meet the Board's goals of protecting student privacy and preventing unscrupulous enrollment practices while still affording schools with flexibility in their operations.

Please let me know if there are any questions on these and we look forward to working with you on these important regulations.

Bryce Adams  
Sr. Director of State Relations

(Lines 31-36) (2) LEAs or their third party vendors shall not use public funds to provide educational, curriculum, instruction, private lessons, or technology reimbursements to individuals, groups of individuals or third party vendors that are not available to all students enrolled in the same grade in the LEA or required by an IEP or 504 plan that is approved by the LEA.

UCA and other online charters provide internet reimbursements and desktop computers to students in grades K-6 as part of the free elementary education required by the Utah state constitution. The new rule as drafted would extend that mandate to the upper grades as well. Our suggested change would limit this mandate to grade bands so that reimbursements provided to one grade level aren't automatically required to be offered to other grades as well. This would give schools the flexibility they need to target their resources, while still allowing students in the same grades to be treated the same.

(Lines 37-40) LEAs or their third party vendors that purchase items or technology devices and provide them to students shall ensure that these items are the property of the LEAs or their third party vendors and are subject to the LEAs asset policies.

UCA currently leases computers from Connections (which is able to buy at a favorable bulk rate) to then provide to students. Leasing instead of buying gives UCA flexibility as enrollment/student demand and technology requirements change. Our proposed change would allow third party vendors, rather than only the LEA, to remain the owner and would

keep UCA flexible in its inventory. We believe the intention of this rule was to make sure that any computers purchased for use in an online program don't end up becoming the property of the family. This change still guards against that possibility, but provides greater flexibility on whether the LEA or a third party contracted by the LEA maintains ownership of the computer.

(Lines 44-53) LEAs shall ensure school enrollment verification records are collected consistent with sound data collection and storage procedures, established by the LEA, and that these records are transmitted securely. It is the LEAs' responsibility to verify the accuracy and validity of student enrollment records, prior to enrolling students in an LEA, and provide students and their parents with notification of enrollment in a public school. An LEA and third party service providers contracted by an LEA to perform duties normally conducted by the LEA are ~~is~~ the only ~~entity~~ entities authorized to collect and store public school enrollment verification records including:

UCA and other schools contract with third party service providers for enrollment services and data storage. This change would allow LEAs to benefit from the services and scale that third party providers are able to provide, while still requiring the collection/storage, regardless of the actor, is "consistent with sound... procedures... and... transmitted securely." The proposed changes are consistent with the sharing of student data allowed by the Federal Education Privacy and Rights Act (FERPA) and strike a balance between student privacy and school efficiency. Each dollar spent by an LEA to run its own enrollment or maintain its own servers, which could be done at less cost by a service provider, is a dollar not spent on student achievement.