

**COVID-19 and Summer School 2020
Questions and Answers for Local Education Agencies**

Q1: What is the deadline for summer school applications?

The application deadline is now June 1, 2020 instead of May 1.

Q2: Can summer school be mandatory?

Summer school attendance cannot be mandatory unless a student's attendance is required for reading remediation or as a condition of promotion ([Section 167.645.3-.5, RSMo](#)).

Q3: How early can summer school start?

Under normal circumstances, schools are required to have a one day break between the last day of their board-approved school calendar and the start of summer school. This year, schools are not required to have a one day break; schools may begin immediately after the last day of their planned calendar. DESE urges schools to be intentional in planning for 2020 summer school and review the items for consideration in [Administrative Memo QS-20-005](#).

Q4: Can summer school be held in July or August?

Yes. Department of Elementary and Secondary Education (DESE) Rule allows summer school to be held at any time during the break between the end of a school year and the beginning of the next school year; therefore, the summer school session can begin at any time. Summer school can also be held during breaks in the regular term.

Q5: Can summer school held in July or August count towards the 2020-21 ADA?

Yes. Summer school attendance submitted with the August Core Data cycle will be added to the 2020-21 ADA. Any summer school attendance submitted after August 31, 2020 will be added to the 2021-22 ADA. Summer school ADA is calculated by taking the total hours of attendance and dividing by 1,044.

Q6: Can the start of classes be staggered during summer school?

Courses must begin and end within the period specified on the summer school application; there are no restrictions. One course might start in the morning of the first day of summer school, while another might start two weeks later in the afternoon. As long as the classes begin and end within the period specified on the summer school application and meet the other requirements outlined in the [Summer School Handbook](#) and [5 CSR 20-100.160](#), schools can exercise this flexibility. Schools should consider a comprehensive re-entry plan for summer school and are urged to review guidance in [Administrative Memo QS-20-005](#).

Q7: If summer school begins, then is interrupted due to a health concern or summer construction, and then resumes and completes its planned instruction, is there a penalty?

As long as the courses begin and end within the period specified on the summer school application and meet the other requirements outlined in the Summer School Handbook and 5 CSR 20-100.160, there is no penalty. If an interruption occurs and the minimum 120 hours are not met, schools may submit a waiver request. If that request is approved, ADA will be prorated.

Q8: Can a school apply for summer school using a “window” approach, similar to the assessment window?

Yes. The summer school application only requires an estimate, rather than actual number, of hours to be attended. As long as a district or a charter meets the minimum of 120 hours between the start and end dates on the application, there is no penalty.

Q9: Can a school implement a “stacking” approach to meet the 120 hour requirement?

Yes. Guidance on stacking is found on page one of the Summer School Handbook and 5 CSR 20-100.160(2). Stacking means combining the hours of separate sections of summer school.

Q10: What if our school only wants to offer a shortened session of summer school, likely in August, to jump start the 2020-21 school year? Is that allowed?

Yes. DESE will review shortened sessions of summer school on a case-by-case basis.

Q11: Could before or after school remediation activities be counted as summer school?

No. Summer school must be held on breaks between or breaks during regular terms (5 CSR 20-100.160 and Summer School Handbook 2020, p. 1). Before and after school remediation is not the same as breaks between or during regular terms. *See Section 167.645.3-.5, RSMo.*

Q12: Can a school use a four-day week for the regular term and hold summer school on the fifth day each week.

No. Summer school can only be held during the break between regular terms or on breaks during the regular term. “Fifth” days of the week do not constitute breaks during the regular term (5 CSR 20-100.160 and Summer School Handbook 2020, p. 1).

Q13: Can CARES Act dollars be used to fund summer school?

Yes. The CARES Act indicates that planning for and implementing summer learning opportunities, both in-person and virtual, are allowable expenses. It should be understood that schools must *not* claim ADA and also fund summer school through CARES Act dollars.

Q14: Could summer school transportation miles be reimbursable?

No. Regular route miles during summer school are not allowable for reimbursement under statute. The only allowable summer school miles are those associated with a student with an Individualized Education Program (IEP) that requires summer school instruction.

Q15: Will any additional resources be available to offset summer school costs for small school hold harmless schools?

Small school formula hold harmless schools do not benefit from the additional ADA that comes from summer school. These schools may consider using CARES Act funds for planning and implementing summer learning opportunities, including in-person or virtual instruction. It should be understood that schools must *not* claim ADA and also fund summer school through CARES Act dollars.

Q16: Is it required that a student attend summer school in their home district or charter school?

No. As in normal summers, students can attend summer school in any Missouri school district or charter school and be claimed for ADA. [Section 167.227, RSMo.](#)

Q17: Can a child attend multiple summer school sessions?

Page one of the Summer School Handbook states “students may enroll and attend summer school classes in only one LEA.” Section 167.227, RSMo, also states “no pupil shall attend summer school classes in more than one district during any one summer.”

To comply with this statute, hours of attendance for any student who attends more than one summer school in the same calendar year that may be claimed for reimbursement will be allowed only in the LEA where the student first attended. LEAs that offer summer school should implement a process to determine whether or not students who are attending summer school have been previously enrolled in another approved summer school in that calendar year.

Q18: How many credits can a high school student earn in the summer?

The nature of the school’s approach will determine this. If a traditional frame of reference is used, a student would earn one-half credit per 60 hours of instruction. However, a competency-based approach could vary significantly from the traditional approach.

Q19: What are the expectations for summer school instruction?

DESE expects summer learning to exhibit the following characteristics:

- Be available to all students
- Be purposefully constructed courses
- Have regular interactions with a teacher
- Provide timely and meaningful feedback to students
- Have assessments that provide evidence of learning aligned to course expectations
- Have content aligned to Missouri Learning Standards and local curriculum
- Provide for monitoring of student engagement
- Provide for monitoring of assignment and course completion
- Use the principles of learning designed to meet all learners’ needs
- Has content that is equivalent to the same course offered during the regular term

Virtual summer school must also exhibit the following characteristics:

- Meet the requirements of [Section 162.1250](#); RSMo
- Use a platform that ensures web accessibility for students with disabilities

Q20: Will summer school be funded if it is done virtually?

Yes. The requirements for virtual coursework that is used for ADA purposes are outlined in Section 162.1250, RSMo. Schools can either create or purchase virtual courses, as long as the requirements of the statute are met.

Q21: If a school holds a virtual summer school, what are the expectations for content and days?

Schools must make sure their virtual content meet the requirements of Section 162.1250, RSMo. A student enrolled in virtual summer courses should receive the same content they would receive in the class if traditionally delivered.

Section 162.1250.5, RSMo, states: “Any school district or charter school that offers instruction in a virtual setting, develops a virtual course or courses, or develops a virtual program of instruction shall ensure that the following standards are satisfied:

- (1) The virtual course or virtual program utilizes appropriate content-specific tools and software;
- (2) Orientation training is available for teachers, instructors, and students as needed;
- (3) Privacy policies are stated and made available to teachers, instructors, and students;

(4) Academic integrity and internet etiquette expectations regarding lesson activities, discussions, electronic communications, and plagiarism are stated to teachers, instructors, and students prior to the beginning of the virtual course or virtual program;

(5) Computer system requirements, including hardware, web browser, and software, are specified to participants;

(6) The virtual course or virtual program architecture, software, and hardware permit the online teacher or instructor to add content, activities, and assessments to extend learning opportunities;

(7) The virtual course or virtual program makes resources available by alternative means, including but not limited to, video and podcasts;

(8) Resources and notes are available for teachers and instructors in addition to assessment and assignment answers and explanations;

(9) Technical support and course management are available to the virtual course or virtual program teacher and school coordinator;

(10) The virtual course or virtual program includes assignments, projects, and assessments that are aligned with students' different visual, auditory, and hands-on learning styles;

(11) The virtual course or virtual program demonstrates the ability to effectively use and incorporate subject-specific and developmentally appropriate software in an online learning module; and

(12) The virtual course or virtual program arranges media and content to help transfer knowledge most effectively in the online environment.”

Q22: What should districts do about requests for MOCAP enrollment for summer school?

LEAs are allowed to enroll summer school students in [MOCAP](#). Standard MOCAP enrollment procedures should be followed. Residency requirements must be met. If an LEA does not offer summer school, MOCAP enrollment requests may be considered, but are not required.

Q23: Can a student enroll in non-MOCAP virtual coursework through another district or charter?

Yes. Because students may enroll in any district or charter during summer school, they may enroll in any district's or charter's virtual summer school. Students should contact the district they wish to enroll in directly.

Q24: Can students take a rolling start to summer virtual classes, since the reimbursement is 94% of either 60 or 120 hours (1/2 credit or full credit course)?

Yes. Courses must begin and end within the period specified on the summer school application; there are no restrictions.

Q25: How does Extended School Year (ESY) for students with disabilities factor into closures or changes?

Each student's IEP should describe the IEP team's decisions regarding the need for ESY. If ESY is needed, the IEP must include a description of what services will be provided, when they will be provided and what IEP goals will be implemented. Before the end of the scheduled school year, each LEA should review IEPs to make sure they meet requirements and plan how to implement the ESY services (to the best of their abilities if in-school services are still not an option over the summer). LEAs should initiate meaningful communication with parents regarding the provision of ESY services. Anything that LEAs

can do over the summer to limit regression and mitigate recoupment time through provision of ESY services will benefit both teachers and students when in-school services resume. ESY services can be provided throughout the summer and should be calculated to reduce the incidence of regression to the greatest extent possible.

ESY services are not automatically cancelled if scheduled summer school programs are cancelled. LEAs should take steps to implement ESY services during summer break. ESY services can be provided any time prior to the start of the next school year; so, if areas are still under stay home orders in June, those LEAs should consider providing ESY services through distance learning or rescheduling them to later in the summer when teachers and students can meet in-person. LEAs should be working on contingency plans for providing distance learning, in case it takes longer than expected for schools to reopen.

Q26: What do we need to do to continue providing meals through the summer?

Seamless Summer Option (SSO) is designed to encourage school districts administering the National School Lunch (NSLP) or School Breakfast Program (SBP) to provide meals during summer months. SSO is not tied to summer school; it can operate even if summer school is not in session.

Standard SSO procedures require reimbursable meals to be consumed on-site in a congregate setting during designated meal times. However, meals can be served at non-school facilities, such as a community building, park or church. Certain waivers from the federal government removed those requirements during COVID-19 extended closures, giving schools flexibility to provide meals to-go to be consumed offsite to allow for social distancing; those waivers are in effect through June 30, 2020. DESE will monitor the COVID-19 emergency. If it appears the situation will continue beyond June 30, 2020, DESE will evaluate the continued need for the waivers and request an extension, if necessary.

Q27: Do we need to update our previously submitted SSO application?

Yes. The LEA will need to revise the SSO application that was approved for COVID-19 school closure and make appropriate changes to dates of summer operation and any changes to meal times, days of the week meals are provided and estimated participation and site type (open or closed enrolled). In the “Comments from LEA” box, specify the methods of meal delivery (i.e. car pickup line or bus delivery) and if parent/guardian is picking up the meal without the student present.

LEAs should also:

- notify households in the district about the availability of meals and any changes made to distribution,
- continue meal counts for reimbursement and proper production records, and
- note changes have been made to allow non-area eligible sites to apply for an area eligibility waiver (see Q26).

Q28: What should I know about eligibility requirements for the SSO feeding program?

Eligibility for SSO sites still apply:

- Open Site: >50% free or reduced eligible by school or census data
- Closed Enrolled Site: >50% free or reduced eligible by student participant

Under the Families First Coronavirus Response Act, schools operating SSO are eligible to apply to operate an open site. Effective April 9, 2020, DESE was approved for an Area Eligibility waiver, which applies to school districts and meal site locations that are not located in “areas in which poor economic conditions exist.” The waiver allows school districts operating SSO in good standing to submit a request to operate open sites. An open site must be committed to feeding all children age 18 and under in the community. Schools may now apply for an area eligible waiver [here](#).