

Open Doors 1418 Youth Reengagement

WAC Revision: 392-700-015

Face-to-Face Attendance Implementation Guidance

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Overview

The 2022 revision of the face-to-face attendance requirement brings new flexibility to the original rule. The revision allows situations where digital-synchronous face-to-face interaction counts toward the required two-hour minimum.

In the original rule, the two-hour minimum attendance requirement required the face-to-face contact to be in person. The new rule retains the original two-hour requirement, and now stipulates that upon enrollment, students must start with in-person face-to-face in their first full month of programming. After enrollment, the new rule enables a program to offer digital-synchronous attendance options to students after the first full month of enrollment as long as the student earns an IAP and/or is apportionable within three count days. This new rule acknowledges and combines both the original rule and the feedback from programs using digital-synchronous attendance during the 2020-2022 emergency rule time period.

If the student becomes unclaimable/unapportionable due to not making an IAP, the program must reinstate the two-hour in-person face-to-face until an IAP is earned.

In short: when a student's participation does not result in an apportionable month due to lack of earning an IAP, the program must meet in-person with the student. The WAC is the minimum as established by OSPI. Each program may determine its approach in implementing more stringent or rigorous in-person participation expectations than what is required in WAC. The local control of each program remains in effect in terms of adding on to the minimum requirements set forth.

	Minimum Attendance Period	Digital-synchronous allowable?
Revised Rule (2022-2023)	2 hours monthly	Yes, with conditions.
Emergency Rule (2020-2022)	2 hours monthly	Yes.
Original Rule (pre-2020)	2 hours monthly	No.

[WAC 392-700-015: Attendance Period Requirement](#)

(3) "**Attendance period requirement**" is defined as, at minimum, two hours of face-to-face interaction with a designated program staff for the purpose of instruction, academic counseling, career counseling, or case management contact aggregated over the prior month. In-person face-to-face interaction is required for the month that the student was claimed for the first time.

Thereafter, the interaction may include an option for digital-synchronous interaction when a student

a) requests digital-synchronous options; or

b) requires digital-synchronous access as determined by program staff.

c) If, after each three (3) months of claimed enrollment, the student has not earned an indicator of academic progress through the utilization of digital-synchronous interaction, then the interaction must return to in-person face-to-face until an indicator of academic progress is earned.

Guidance

This WAC distinguishes between the initial enrollment period and the first full month of enrollment. In Open Doors 1418 programming, during the calendar month preceding the first claim date, students are required to participate in case management, instruction, career planning, or college planning with no specific requirement for time or method. The first full month of enrollment begins with the first claim for apportionment. It is during this month that the program must require in-person face-to-face interaction. Please note that this also applies to re-enrolling students who have been unclaimed for 11+ months.

Programs will need to document the reason for the subsequent provision of the digital-synchronous option. This relates to (1) and (2) within the WAC. This does not change the existing documentation requirements of the date when an indicator of academic progress was earned.

The program must document:

- Date of initial enrollment or re-enrollment after a student has not been claimed for a period of 11 or more months;
- Which reason digital-synchronous was available: (1) student request or (2) program determination;
- Dates for when indicator(s) of academic progress (IAPs) are earned by student.

See also: [Eligibility Determination Examples](#) and [Frequently Asked Questions](#).

Definition of digital-synchronous

The language in 2022 WAC revision for the attendance period requirement allows for digital-synchronous face-to-face interaction under certain conditions. This means synchronous, reciprocal communication happening in real time, documented for the purposes of instruction, academic advising, career advising, or case management. This may take place via:

- Telephone
 - Maintain documentation of conversations in a contact log, including date, time, duration, and purpose of each call.

- Instant messaging
 - Exchange must include evidence of same-time reciprocal communication, with minimal lag time between exchanges, as in a real-time conversation.
- Interactive video communication
 - Maintain documentation of conversations in a contact log, including date, time, duration, and purpose of each interaction
 - Permission must be obtained from the parent, or the student if age 18+, in writing for recording video communications.
- Other means of digital communication
 - Maintain documentation of conversations in a contact log, including date, time, duration, and purpose of each interaction
- NOTE: Email does not meet the requirements of the new face-to-face emergency rule unless immediate/synchronous responses can be documented.

Why digital-synchronous?

Some youth experience access and engagement barriers. Challenges may include transportation, hours of employment that conflict with program hours, or family circumstances. There are also occasions when the student's participation in the program is inhibited by policy, procedure, or practice outside of the student's or program's control. For example, a student may not be allowed on campus due to a restraining order, expulsion or suspension status, or some other situation that bars access to an Open Doors 1418 program co-located where the student is actively barred or prohibited from accessing. In these cases, in-person face-to-face requirements may be met away from the school campus, as detailed below.

A Note on Asynchronous

Some programs inquired about the enabling of asynchronous digital attendance. While asynchronous learning occurs within Open Doors, asynchronous attendance is not permitted as part of the 2022 revised permanent rule for meeting the face-to-face attendance requirement.

- Additional data are needed to determine if a fully asynchronous option can substantially deliver on the intent and outcomes unique to Open Doors 1418 Youth Reengagement programs.
- Gathering student voice and examining data on enrollment and stick-rate are areas that require further data collection and analysis.

Strategies for In-Person Face-to-Face Requirements

Programs may adjust their delivery strategies to meet students' needs for in-person face-to-face requirements. This includes the utilization of locations deemed by students as more accessible. This may include home visits, libraries, jobsites, or other collaboratively-determined places.

Open Doors services are not required to be held at any single site. Services may occur in various locations to support the needs of students. Delivery formats vary, spanning in-person one-to-ones, group meet-ups, cohort meetings, and family check-ins. Case managers, instructors, and other program staff can be creative in how they deliver student support. The state WACs do not dictate how in-person face-to-face support takes place, only that they occur related to the minimum attendance requirement. Local programs may set rules guiding the approaches staff may use and their related procedures.

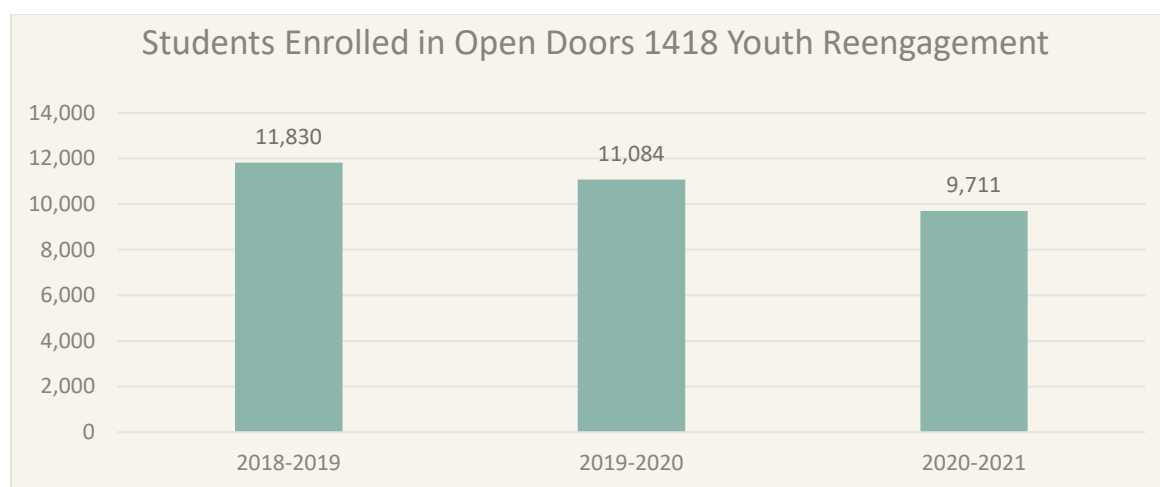
OSPI recommends that prior to summer and winter breaks and/or upon return from summer and winter breaks, that the program requires in-person face-to-face of students. Building in more frequent in-person requirements is always an option for programs and programs are not required to utilize digital-synchronous for face-to-face.

Once the student is eligible for digital-synchronous face-to-face, either or both methods may be utilized to count toward the minimum monthly attendance requirement.

Context for the Rule Revision

As part of the emergency response to the pandemic, OSPI implemented a series of emergency rules to reduce pandemic related barriers-to-access in Open Doors 1418 Youth Reengagement programming. The temporary emergency rules allowed for the first implementation of a digital-synchronous attendance option.

In reviewing the enrollment data for Open Doors, OSPI found that like all education settings, Open Doors Youth Reengagement programs experienced a reduction in enrollment throughout the pandemic. Through our statewide survey process, we learned from program staff that some students have excelled with digital-synchronous learning and attendance options, while other students left the reengagement system. Despite innovative applications of digital-synchronous learning, maintenance of face-to-face as allowable, and hybrid approaches, student enrollment significantly declined.



Enrollment Data, CEDARS; Data pulled January 2022

Additional Considerations

During the emergency-response phase of the pandemic, wide-spread innovations occurred. The establishment of the 2022 permanent attendance rule works to balance the diminishing need for mass quarantine and the growing return of unrestricted public engagement. Like all Washington public education settings, Open Doors programs are transitioning from pandemic-informed practice and into mid- to long-term implementation planning.

The 2022 revised attendance rule promotes enabling connected environments for students. It establishes a flexible minimum attendance rule applicable to all Open Doors 1418 Youth Reengagement programs. The program's intended purpose is to serve Washington students who are unable to benefit from other programs due to age and severity of credit deficiency by helping them to make progress toward meaningful credential and career skills. OSPI believes this rule revision supports students, families, and program providers to achieve that purpose.

To learn more about the decision and context related to the revision of the attendance period requirement, please see OSPI's [Decision Summary WAC Revision: 392-700-015](#) document.

Frequently Asked Questions

1. *If a student enrolled on March 15th, would the student need two hours of in-person face-to-face in April (first claimable month) or two hours in March?*
-

Answer: The in-person interaction needs to occur through the month of the first claim day. During the partial month preceding this claim day, students are only required to participate in case management, instruction, career planning, or college planning. In this example, the partial month is March, and April is the first full month of enrollment in which the student is first claimed for apportionment. It is during April that the program requires two hours of in-person, face-to-face interaction.

2. *What if a student has met the IAP, but is not claimable because they did not get two (2) hours of digital or in-person interaction for the month? Would this student need two hours of in-person to be claimable again, or would two hours digital-synchronous be sufficient?*
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Answer: The language in the WAC refers only to the attainment of the IAP, and therefore it is up to the program's discretion in determining whether the student needs to continue with in-person face-to-face, or if they may return to digital-synchronous.

3. *What about students who experience school anxiety, social phobia, panic disorder, etc. Will requiring two hours per month of in-person attendance cause access inequity?*
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Answer: How to proceed should be determined on a case-by-case basis, and should include alternate location options. If these are ongoing issues for the student, the student should be referred for an evaluation under Section 504. (It may be that the student has disabilities and needs related accommodations, aids, and services to access and benefit from their education.) Depending on the suspected nature of the disability, it may be more appropriate to refer the student for a special education evaluation. If the student is determined eligible under either, the 504 (or IEP) team will determine the services the student needs to receive a free appropriate public education (FAPE).

4. *Will requiring in-person participation reduce enrollments or deter students from engaging in or accessing the program?*
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Answer: To date, the program's largest enrollments have occurred when monthly in-person, face-to-face attendance was required; enrollments dropped during the period when in-person

was not required. Based upon pre-pandemic enrollment data compared to counts experienced during the pandemic when no in-person requirements were in place, OSPI has determined that in-person, face-to-face attendance requirements are feasible and not a barrier to participation. Quantitative and qualitative data indicate that in-person requirements improve enrollment and participation of students in Open Doors 1418 Youth Reengagement.

5. *Does the 2022 rule make the face-to-face attendance period an eligibility requirement? Our concern is that it will unfairly punish students who do not make an indicator of academic progress.*

Answer: Yes, the in-person face-to-face is an eligibility requirement for the second claim date and if the student has not met an IAP when required. In providing in-person face-to-face, data show that there is a higher likelihood that the student will succeed in making the IAP, and thereafter be eligible for digital-synchronous face-to-face.

6. *What about students who want or need a program that does not require in-person interaction or attendance?*

Answer: Online learning programs exist as an alternative option. Students can be referred to online learning programs if they seek a program with no in-person requirements. Learn more at [Online Learning | OSPI \(www.k12.wa.us\)](https://www.k12.wa.us/online-learning)

7. *Why does the rule require in-person attendance in Open Doors?*

Answer: Prior to the COVID-19 pandemic, the face-to-face attendance period requirement was in-person-only. From 2020-2022, OSPI implemented an emergency rule allowing for fully digital-synchronous interactions to replace all instances of in-person attendance. This was done so that programs could operate during the height of the pandemic. Our data indicate that in-person support reinforces student progress and is widely accepted by staff in Open Doors Youth Reengagement Programs as a necessary and vital component of program implementation.

8. *How does this apply to continuous, returning, and reenrolling students?*

Answer: Definitions of each term are provided along with face-to-face guidance.

- A *continuous student* is an enrolled student who has continuously been enrolled in the program and claimed for state funding on at least one count day.

- These students are required to return to in-person face-to-face if they have not made an IAP when required. They may return to digital-synchronous once they have made an IAP.
- *A returning student* is an enrolled student who has returned to the program after not receiving program services for a period of at least one count day and not more than ten count days.
 - During the partial month preceding the returning enrollment's claim day, students are only required to participate in case management, instruction, career planning, or college planning. Thereafter, the student may receive digital-synchronous face-to-face if an IAP has been made during the required count-back time period.
- *A reenrolling student* is an enrolled student who has reenrolled in the program after not receiving program services for a period of eleven (11) count days or more.
 - This student should be considered the same as a new student.
 - The in-person interaction needs to occur through the month of the first claim day. During the partial month preceding this claim day, students are only required to participate in case management, instruction, career planning, or college planning.

9. *How was program voice used to inform the 2022 WAC revision of the face-to-face attendance period requirement?*

Answer: OSPI conducted a statewide survey and response analysis to inform the revision, in addition to meeting with key stakeholder groups. Please see the following documents that provide both summary and in-depth information:

- [Open Doors Face-to-Face Survey Data Package Analysis](#)
- [Face-to-Face Survey Results: January 2022 - YouTube](#)
- [Decision Summary WAC Revision: 392-700-015](#) OSPI document



*Eligibility Determination Examples:
Grids, Charts, and Sample Calculations*



Eligibility Determination Examples

(Sequence numbers indicate months counted for IAP calculation; F2F = Face-to-face; IAP = Indicator of Academic Progress; FTE = Full-time Equivalent)

September new enrollment:

Month	August	September	October	November	December	January
FTE claim	0-new	1.0	1.0	1.0	1.0	0
IAP req					Not met	
F2F	Participation prior to Sept count	In person	Digital-synch allowed	Digital-synch allowed	Digital-synch allowed	In person

0/bye) September P223-1418: student is enrolled 9/4 as new and is claimed for September on the Open Doors P223-1418 because they had **evidence of participation in learning** on or before the fourth school day of September.

- 1) October P223-1418: Student can be claimed as a 1.0 FTE, if they met the attendance requirement of 2 hours in person F2F and met the weekly status checks in September.
 - 2) November P223-1418: Student can be claimed as a 1.0 FTE, if they met the attendance requirement of 2 hours in person or digital/synchronous F2F and met the weekly status checks in October.
 - 3) December P223-1418: Student can be claimed as a 1.0 FTE, if they met the attendance requirement of 2 hours in person or digital/synchronous F2F and met the weekly status checks in November. **No IAP earned in December.**
-) January P223-1418: Student cannot be claimed for state funding. For the month of January, in-person F2F returns until IAP is earned.
 [IAP counting back December, November to October 1 = NO] **No IAP earned**

Mid-March new enrollment

Month	March	Apr.	May	June	July	August	Sept.	October	Nov.
FTE claim	0-new	1.0	1.0	1.0	1.0	0	1.0	1.0	0
IAP req			met			n/a	(bye)	Not met	
F2F	Participation only	In person	Digital-synch allowed	Digital-synch allowed	Digital-synch allowed	participation prior to Sept count	Digital-synch allowed	Digital-synch allowed	In person

0) Student enrolls 3/15 as a new student.

1) April P223-1418: The student can be claimed as a 1.0 FTE if they have shown participation in learning on or before the April count day.

2/1) May P223-1418: Student can be claimed as a 1.0 FTE if they met the attendance requirement of 2 hours in person F2F and met the weekly status checks in April. **IAP earned** [IAP countback restarts]

2) June P223-1418: Student can be claimed as a 1.0 FTE if they met the attendance requirement of 2 hours in person or digital/synchronous F2F and met the weekly status checks in May.

3) July P223-1418: Student can be claimed as a 1.0 FTE if they met the attendance requirement of 2 hours in person or digital/synchronous F2F and met the weekly status checks in May.

skip) August – not enrolled due to summer break; no face-to-face required; participation only required for September claim.

bye) September P223-1418: The student can be claimed as a 1.0 FTE if they have shown participation in learning on or before the September count day.

[IAP counting back July, June to May 1 = YES]

October P223-1418: Student can be claimed as a 1.0 FTE if they met the attendance requirement of 2 hours in person or digital/synchronous F2F and met the weekly status checks in September.

[IAP counting back (skip September, August), July, June to May 1 = YES] No IAP earned in October

-) November P223-1418: Student cannot be claimed for state funding. For the month of November, in-person F2F returns until IAP is earned.

Mid-year continuous enrollment

Month	December	January	February	March	April	May	June
FTE claim	1.0	1.0	1.0	1.0	0	0	1.0
IAP req	met			Not met		met	
F2F	Digital-synch allowed (continuing student in good standing)	Digital-synch allowed	Digital-synch allowed	Digital-synch allowed	In person	In person until IAP, then digital-synch allowed	Digital-synch allowed

- 1) December P223-1418: Student can be claimed as a 1.0 FTE if they met the attendance requirement of 2 hours F2F and met the weekly status checks in November. **IAP earned.** (IAP countback restarts)
 - 2) January P223-1418: Student can be claimed as a 1.0 FTE if they met the attendance requirement of 2 hours in person or digital/synchronous F2F and met the weekly status checks in December.
 - 3) February P223-1418: Student can be claimed as a 1.0 FTE if they met the attendance requirement of 2 hours in person or digital/synchronous F2F and met the weekly status checks in January.
- March P223-1418: Student can be claimed as a 1.0 FTE if they met the attendance requirement of 2 hours in person or digital/synchronous F2F and met the weekly status checks in February.
 [IAP counting back February, January to December 1 = YES] **No IAP earned in December**
-) April P223-1418: Student cannot be claimed for state funding. For the month of April, in-person F2F returns until IAP is earned.
 [IAP counting back March, February to January 1 = NO] **No IAP earned**

1) May P223-1418: Student cannot be claimed for state funding. For the month of May, in-person F2F returns until IAP is earned.

[IAP counting back April, March to February 1] IAP earned in May

2) June P223-1418: Student can be claimed as a 1.0 FTE if they met the attendance requirement of 2 hours in person before the IAP or (may be combined) digital/synchronous F2F after the IAP and met the weekly status checks in May.

Mid-year continuous enrollment with interruptions

Month	December	January	February	March	April	May	June
FTE claim	1.0	1.0	0	1.0	1.0	0	1.0
IAP req	met				Not met	met	
F2F	digital/synch allowed (continuing student in good standing)	Digital-synch allowed Not met	Digital-synch allowed	Digital-synch allowed	Digital-synch allowed	In person until IAP, then digital-synch allowed	Digital-synch allowed

- 1) December P223-1418: Student can be claimed as a 1.0 FTE if they met the attendance requirement of 2 hours F2F and met the weekly status checks in November. IAP earned in December [IAP countback restarts]
- 2) January P223-1418: Student can be claimed as a 1.0 FTE if they met the attendance requirement of 2 hours in person or digital/synchronous F2F and met the weekly status checks in December. **F2F/WSC not met**
-) February P223-1418: Student cannot be claimed for state funding as they did not meet the attendance requirement of 2 hours in person or digital/synchronous F2F and/or the weekly status checks in January.
[Month not counted in IAP countback]
- 3) March P223-1418: Student can be claimed as a 1.0 FTE if they met the attendance requirement of 2 hours in person or digital/synchronous F2F and met the weekly status checks in February. Digital-synchronous allowed.
- April P223-1418: Student can be claimed as a 1.0 FTE if they met the attendance requirement of 2 hours in person or digital/synchronous F2F and met the weekly status checks in March.
[IAP counting back March, (skip February), January to December 1 = YES] **No IAP earned in April**

1) May P223-1418: Student cannot be claimed for state funding. For the month of May, in-person F2F returns until IAP is earned.

[IAP counting back April, March, (skip February), to January 1 = NO] IAP earned in May

2) June P223-1418: Student can be claimed as a 1.0 FTE if they met the attendance requirement of 2 hours in person or digital/synchronous F2F and met the weekly status checks in May.

Mid-year returning student enrollment

Month	December	January	February	March	April	May	June
FTE claim	1.0	1.0	0	0	0	1.0	0
IAP req	met					Not met	met
F2F	digital/synch allowed (continuing student in good standing)	Digital-synch allowed Not met	No contact/withdrawn	Not enrolled	Returned to services	digital-synch allowed	In person until IAP, then digital-synch allowed

- 1) December P223-1418: Student can be claimed as a 1.0 FTE if they met the attendance requirement of 2 hours F2F and met the weekly status checks in November. IAP earned in December [IAP countback restarts]
- 2) January P223-1418: Student can be claimed as a 1.0 FTE if they met the attendance requirement of 2 hours in person or digital/synchronous F2F and met the weekly status checks in December. **F2F/WSC not met**
-) February P223-1418: Student cannot be claimed for state funding as they did not meet the attendance requirement of 2 hours in person or digital/synchronous F2F and/or the weekly status checks in January. Withdrawn by program choice. [Month not counted in IAP countback]
-) March P223-1418: Student is not enrolled and cannot be claimed for state funding. [Month not counted in IAP countback]
-) April P223-1418: Student is not enrolled and cannot be claimed for state funding. Student returns to enrolled status on 4/25. [Month not counted in IAP countback]
- 3) May P223-1418: The student can be claimed as a 1.0 FTE if they have shown participation in learning on or before the May count day. **No IAP earned in May**

1) June P223-1418: Student cannot be claimed for state funding. For the month of June, in-person F2F returns until IAP is earned. [IAP counting back May, (skip April, March, February), January, to December 1 = NO] IAP earned in June

Acknowledgements

Law & Rule

RCW [28A.175.100](#) Statewide dropout reengagement program.

WAC [392-700](#) DROPOUT REENGAGEMENT.

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