# RSAI Comments Regarding Proposed Rules

# ARC 5581C Online Learning May 11, 2021

Thank you for the opportunity to provide comment regarding proposed rules to clarify and implement online learning for Iowa school districts and AEAs. The Rural School Advocates of Iowa (RSAI) is generally supportive of the proposed rules, but has the following suggestions to further clarify and some additional questions.

**Under 281-15.2(256) Definitions:** The term “*Online Learning Platform*” should be included in the definitions list, defined as the interface by which students access online educational content and through which educators and students connect and communicate. The online learning platform used is under the sole discretion of the school district or AEA providing the online learning coursework.

**281-15.3(2) Course Eligibility:** Add to the end of the sentence after delivery. . . unless the course meets one of the exceptions in 15.8(2).

**281-15.5(3)(b):** The list of teacher qualifications first appears here, but is stated several other times throughout the rules – in addition, after coursework, add “or appropriate experience”. Given recent changes to licensure and reciprocity, we believe an experienced online teacher from another state, who may be granted Iowa licensure, and has experience in online teaching should not be required to endure additional coursework duplicative of their demonstrated experience.

**15.5(4) Approval Process:** First appears here but also is stated several other times throughout the rules – private provider. We suggest the rules allow for private or public providers, or add a definition under 15.2 that private provider includes for-profit, nonprofit, or public providers other than an Iowa school district or AEA.

**15.8(5) Coordination and Costs: Suggest adding: Federal or other funds, if available, may be used to offset what would otherwise be costs . . . For example, if donations were made for computer science programming courses to the Governor’s fund created to expand, those might be able to help offset costs. If you only specify federal, that could be limiting.**

**Would also suggest adding a general statement that these rules apply to districts offering online coursework for offer and teach requirements or as a general delivery of instruction for students, including for open enrollment purposes, and are not meant to prohibit district offerings to their own resident students for purposes of meeting credit recovery, for suspension or expulsion alternatives, for individualized course of study meeting a student’s health or academic needs, or other issues arising at the local district level to meet the individual needs of resident students.**

**Thanks again for the opportunity to provide input.**

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