

A Systemic Performance Audit of

Juab School District

A Review of Teacher Experience,
Student Achievement, and
Statewide Online Education

Office of the Legislative
Auditor General

Report to the UTAH LEGISLATURE







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May 14, 2024

TO: THE UTAH STATE LEGISLATURE

Transmitted herewith is our report:

“A Systemic Performance Audit of Juab School District” [Report #2024-08].

An audit summary is found at the front of the report. The scope and objectives of the audit are included in the audit summary. In addition, each chapter has a corresponding chapter summary found at its beginning.

This audit was requested by The Legislative Audit Subcommittee.

Utah Code 13-12-15.3(2) requires the Office of the Legislative Auditor General to designate an audited entity’s chief executive officer (CEO). Therefore, the designated CEO for Juab School District is Superintendent Dr. Kodey Hughes. Dr. Hughes has been notified that he must comply with the audit response and reporting requirements as outlined in this section of *Utah Code*.

We will be happy to meet with appropriate legislative committees, individual legislators, and other state officials to discuss any item contained in the report in order to facilitate the implementation of the recommendations.

Sincerely,

Kade R. Minchey, CIA, CFE

Auditor General

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► AUDIT REQUEST

The Legislative Audit Subcommittee requested and prioritized a systemic performance audit of Juab School District. This is the fourth audit of Local Education Agencies (LEAs). This type of audit has an initially large scope that is reduced as risks are identified.

► BACKGROUND

Juab School District is a semi-rural district with a student population of around 2,750. The district contains three elementary schools, one junior high school and one high school. Juab School District experienced notable challenges during the pandemic from which it is actively working to recover. Juab is one of a handful of LEAs that offers a Statewide Online Education Program (SOEP) for Utah students through a contract with Arizona State University (ASU Prep Juab). However, few students that attend Juab School District choose to participate in SOEP courses offered through ASU Prep Juab.

JUAB SCHOOL DISTRICT

► KEY FINDINGS

- ✓ Low salary and high workload could add to difficulties in recruiting and retaining more experienced teachers.
- ✓ Juab School District has high graduation rates despite average test scores.
- ✓ RISE testing data shows some recovery, although the junior high school continues to score below peers.
- ✓ The Legislature should consider policy questions that have developed in Juab's Statewide Online Education Program.



RECOMMENDATIONS

- ✓ 1.2 Juab School District should add metrics to its strategic plan to determine the effectiveness of district-wide initiatives.
- ✓ 2.1 Juab School District should engage with its stakeholders to develop consistent policies and provide education to staff on the implementation of competency-based grading.
- ✓ 2.2 Juab High School should continue to work with Juab Junior High to identify specific subjects and standards in which students scored poorly and develop interventions that specifically target those areas.
- ✓ 3.1 The Legislature should consider clarifying the intent of statute to determine if participating schools' implementation model of in-person, scheduled learning should be funded through the Statewide Online Education Program.

REPORT SUMMARY

Teachers in Juab School District Have Fewer Years of Experience Than Average

Juab teachers expressed concerns with low pay and high workload. These factors may play a role in the relative inexperience of Juab teachers. The district has dealt with recruitment challenges, which may contribute to hiring less experienced teachers, without the appropriate professional licenses.

Juab School District Has Seen Some Academic Improvements Post-COVID, but More Can be Done

Juab School District's graduation rates are consistently among the highest in Utah, yet their standardized test scores are often at or below average compared to peer districts.

Teacher Years of Experience

Compared to peer districts, Juab has a higher percentage of inexperienced teachers. Our research indicates that teacher inexperience can negatively impact student learning.

The Legislature Should Consider Policy Questions That Have Developed in Juab's Statewide Online Education Program

Juab's SOEP allows some schools to engage in a hybrid model, in which they combine online resources with in-person learning. This arrangement is called a "cohort" in which students in the physical classroom are all enrolled in SOEP as a class. Students not attending these specific schools, or who want to participate in SOEP and learn at an alternative pace may not be able to participate in a cohort and take advantage of the in-person learning portion. It is unclear, after working with stakeholders and reviewing statute with legislative attorneys, whether the cohort delivery system aligns with legislative intent because some students' full access could be inhibited.

Teachers' Years of Experience			
Percentage of Teachers with Less Than 7 Years of Experience			
	Above State Average	Below State Average	At State Average
2020-2021			
Juab	36%	43%	36%
Carbon	33%	36%	29%
Millard	27%	33%	22%
North Sanpete	34%	36%	27%
South Sanpete	25%	32%	25%
State Average	37%	39%	34%
2021-2022			
2022-2023			

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BACKGROUND

After surveying and conducting interviews with many teachers in Juab School District the common theme of low pay and high workload emerged. These factors may play a role in Juab's high percentage of teachers with less than seven years of experience.

Teachers' Years of Experience
Percentage of Teachers with Less Than 7 Years of Experience

	Above State Average	Below State Average	At State Average
	2020-2021	2021-2022	2022-2023
Juab	36%	43%	36%
Carbon	33%	36%	29%
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State Average	37%	39%	34%

FINDING 1.1
Low Salary and High Workload
Contribute to Difficulties in
Recruiting and Retaining Experienced
Teachers

RECOMMENDATION 1.1

Juab School District should continue to look for ways to raise teacher salaries to better align with compensation in nearby districts.

RECOMMENDATION 1.2

Juab School District should add metrics to its strategic plan to determine the effectiveness of district-wide initiatives.



CONCLUSION

While Juab School District has implemented various strategies to increase teacher retention and recruitment, more can still be done.





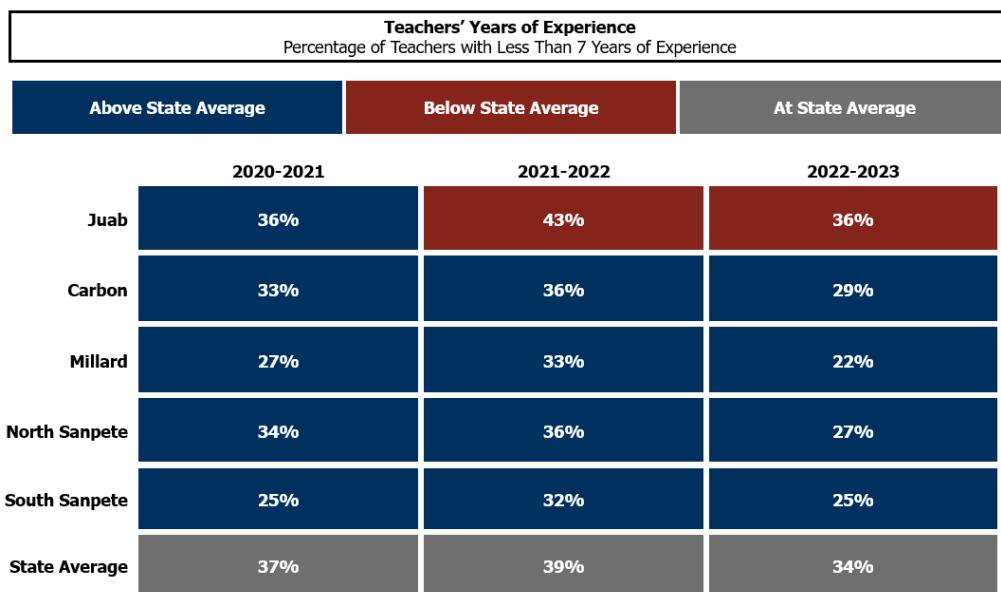
Chapter 1

Teachers in Juab School District Have Fewer Years of Experience Than Average

1.1 Low Salary and High Workload Contribute to Difficulties in Recruiting and Retaining Experienced Teachers

Teachers expressed concerns with low pay and high workload in surveys and interviews. These factors may play a role in the relative inexperience of Juab School District's (Juab or district) teachers. Compared to the state and its peer districts, Juab has a higher percentage of educators with 6 or fewer years of teaching experience. Although a direct correlation cannot be made between teacher inexperience and low test scores, which will be discussed in Chapter 2, our research indicates that teacher inexperience can negatively impact student learning. According to the district, the number of job applications they receive per opening has been very low, often only 0-2 applicants. This could cause the district to have little choice but to hire less experienced teachers, without professional licenses. Comparison data is shown in Figure 1.1 below.

Figure 1.1 Juab teachers are below state and peer averages in years of experience.



Source: Auditor Generated using Data from Utah School Report Card.



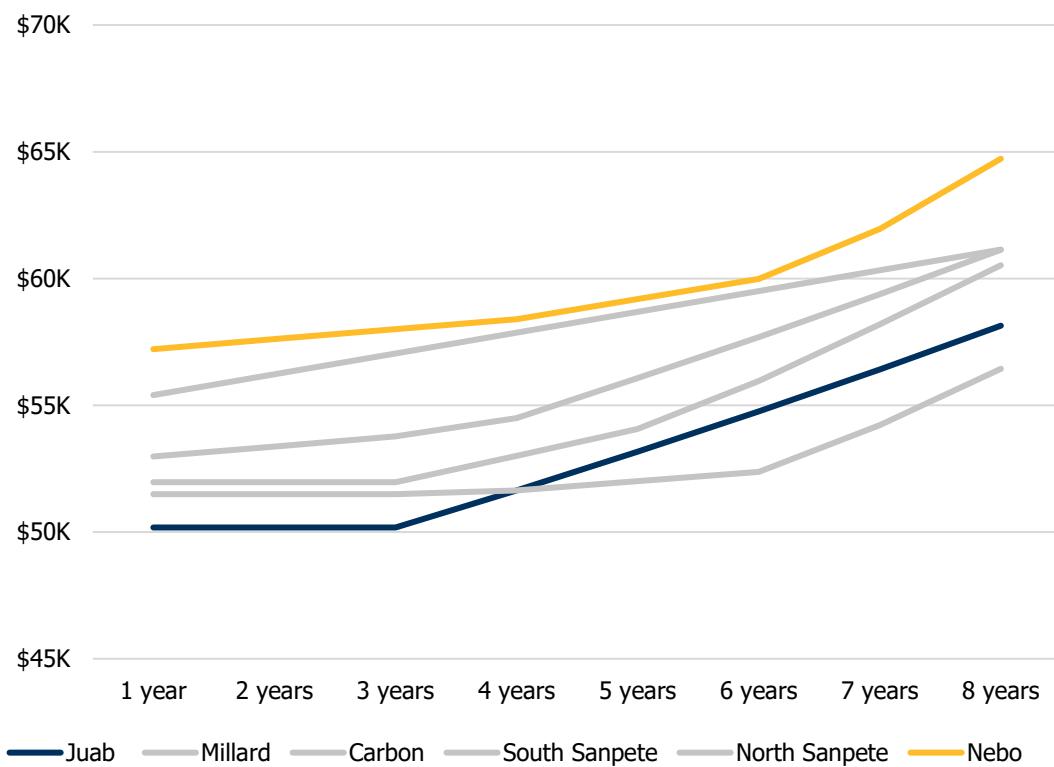
Low Salary Makes Teacher Recruitment More Challenging

One challenge the district faces when recruiting and retaining experienced teachers is its comparatively low salaries. When teacher wages fall below those offered by neighboring school districts and other industries, it becomes more difficult to attract and retain qualified educators. Juab's starting salary is the lowest in its peer group. Moreover, a neighboring school district, located just 30 minutes away from Nephi (where the Juab School District offices are located), offers teachers a starting salary of approximately \$7,000 higher. This salary discrepancy persists throughout a teacher's career, further exacerbating retention issues. This comparison is shown in Figure 1.2.



Juab School District consistently offers a relatively low teacher salary, with its starting pay ranking the lowest among its peers.

Figure 1.2 Juab Has the Lowest Starting Salary Compared to Its Peer Districts. The figure shows teacher starting salaries without experience or a masters degree.



Source: Auditor generated from posted school district salary schedules.



High Workload at Juab School District Could Increase Teacher Burnout

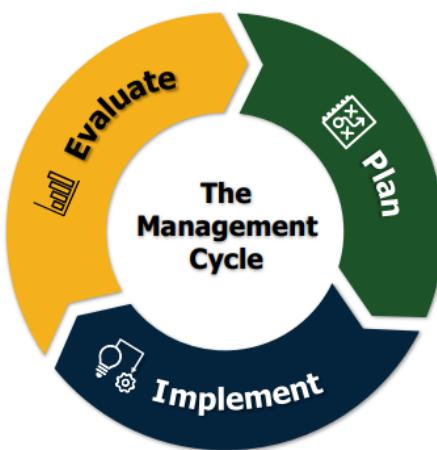
Survey and interview responses from teachers consistently mention high workload expectations within Juab School District. Many of the teachers attribute this high workload to a range of initiatives implemented by the district, including the adoption of competency-based grading. One administrator over this area acknowledged that due to this heavy lift for teachers, additional supports from the district are needed. Competency-based grading requires teachers to create individual rubrics for each content standard, creating more workload in the grading process. These standards used to create rubrics are the Utah core standards in each content area. While all teachers in the state are required to teach these same standards, not all use the standards in their grading practices.

Juab's strategic priorities and plan does not include any clear metrics to gauge the achievement, completion, or effectiveness of these initiatives. Establishing a transparent management cycle that incorporates regular review and revision of initiatives could provide teachers with a greater perspective and clarity on the district's overarching rationale and the benefits to students in each initiative. Such a structured approach promotes evidenced-based decision-making by prioritizing planning, implementation, and evaluation phases.



Transparent management cycles to evaluate initiative effectiveness could help alleviate workload concerns.

Due to the ever-changing needs of a district, the management cycle Juab chooses to adopt must be agile and adaptive. Insights gained during the evaluation phase should then be used to inform and refine plans, starting the cycle over again.



While more could be done by Juab to address issues in initiatives that contribute to high teacher workload, they have already implemented some programs that appear to foster teacher experience, as discussed in Appendix A.

Source: The Best Practice Handbook by the Office of the Legislative Auditor General



RECOMMENDATION 1.1

Juab School District should continue to look for ways to raise teacher salaries to better align with teacher compensation in nearby districts.

RECOMMENDATION 1.2

Juab School District should add metrics to its strategic plan to determine the effectiveness of district-wide initiatives.



BACKGROUND

Juab School District is a small district with about 2,750 students at three elementaries, one junior high and one high school. Juab experienced the greatest learning loss in the state during the COVID-19 pandemic. Since then, the district has been focused on recovery.

FINDING 2.1

Juab School District Has High Graduation Rates Despite Average Test Scores

RECOMMENDATION 2.1

Juab School District should engage with its stakeholders to develop consistent policies and provide education to staff on the implementation of competency-based grading.

FINDING 2.2

RISE Testing Data Shows Some Recovery, Although the Junior High School Continues to Score Below Peers

RECOMMENDATION 2.2

Juab High School should continue to work with Juab Junior High to identify specific subjects and standards in which students scored poorly and develop interventions that specifically target those areas.

FINDING 2.3

Elementary School RISE Scores Are Low, But Some Subjects Show Improvement

RECOMMENDATION 2.3

Juab School District should continue to engage with parents of frequently absent students.

RECOMMENDATION 2.4

Juab School District should consider additional strategies to encourage attendance in frequently absent students.

FINDING 2.4

Juab School District Did Not Report Past English Language Learning Students, Resulting in a Loss of Funding

RECOMMENDATION 2.5

Juab School District should continue to monitor English Language Learner reporting to the Utah State Board of Education and communicate yearly to make sure Juab is receiving funds.



CONCLUSION

Juab School District must continue to focus on recovery, post COVID-19. The district has seen recovery in several areas, but English language arts remains a problem districtwide. Additionally, the junior high is testing below average in all areas. Finally, Juab School District missed out on funding due to its failure to report English language learners to USBE.





Chapter 2

Juab School District Has Seen Some Academic Improvements Post-COVID, but More Can be Done

2.1 Juab School District Has High Graduation Rates Despite Average Test Scores

Juab School District's (Juab or district) graduation rates are consistently among the highest in Utah, with a 98 percent graduation rate in 2023. Although their graduation rate is high, their standardized test scores are often at or below



Juab School District maintains a high graduation rate in Utah, but some of its standardized test scores fall below average among peer districts.

average when compared to peer districts. In addition, the district reportedly experienced the highest percentage of learning loss in the state during COVID-19. While the district has worked diligently to remedy its loss of learning, we believe more can be done. However, Juab School District graduates who attend institutions of higher education appear to be well prepared for their chosen path, with the second-highest average college GPA of their peer group in

2022. Unfortunately, we were unable to assess outcomes for Juab graduates attending technical colleges or joining the workforce due to a lack of data.

Juab's American College Testing (ACT) Scores Have Risen Since COVID-19

Juab School District's ACT scores fell in the years following the pandemic. The most dramatic decrease occurred in the reading category; in 2021 they had the lowest reading ACT score in their peer group. However, since 2021 Juab has increased test scores in all areas of the ACT, returning to near pre-COVID scores. While test scores have increased, Juab remains in the middle of peer districts for ACT scores. The district should continue to focus on improving English language arts in high school and provide timely interventions for students who enter high school academically behind their peers.

There May Be Better Ways to Implement Competency-Based Grading at the Secondary Level

Juab is one of only a handful of school districts that utilize competency-based grading on the secondary level in Utah. The district develops learning targets for every statewide standard in every subject taught. Learning targets are then broken down into elements in which students can demonstrate their level of



competency using individualized methods. Students are graded 1-4 with 1 showing basic knowledge and 4 indicating a student has advanced understanding of the standard.

In interviews with the auditors, some staff members expressed frustration with this way of grading. One suggested that effort may be swaying some grading practices instead of learning outcomes. Additionally, inconsistencies were observed in the terminologies used to discuss competency-based grading. Some inconsistencies may be due to the high number of new staff in the district (discussed in chapter 1). To address these concerns, Juab should engage with its stakeholders in the development of consistent policies and provide education to staff on the implementation of competency-based grading.

RECOMMENDATION 2.1

Juab School District should engage with its stakeholders to develop consistent policies and provide education to staff on the implementation of competency-based grading.

2.2 RISE Testing Data Shows Some Recovery, Although the Junior High School Continues to Score Below Peers

Juab Junior High School Scores Below Peer Schools in All RISE-Tested Subject Areas

Based on both proficiency and student growth, for all three RISE-tested subjects, Juab Junior High has consistently performed below peer districts post-COVID. Scores for junior high students' proficiency have also continuously declined post-COVID with only a few pockets of recovery among the general school population. Test scores have shown signs of improvement in 6th grade science and 7th grade math.

Figure 2.1 shows Juab Junior High RISE testing scores for the 2022-2023 school year.



Figure 2.1 Juab Junior High School RISE Test Scores Are Consistently Below Peers.

The numbers demonstrate the need for continued intervention schoolwide, both individually and in small groups.



Source: Auditor Created from USBE data.

Juab Junior High students averaged below 2, which is less than proficient, in all but 6th grade science and 7th grade math. This loss of learning could eventually affect high school ACT scores and college and career readiness. Juab Junior High School has responded by double blocking certain core subjects and offering interventions on Fridays.

Several Factors for Which the District had Limited Control May Have Impacted Test Scores

Juab Junior High School has experienced significant turnover over the past five years. The current principal is in his first year as principal at the school. Prior to that, the school had two different principals over three years. Turnover in administration may have led to underperformance. Additionally, since 2019, the school has lost 19 teachers. Because of this, the district had to hire many new teachers. The district reports having limited candidates to choose from given



their rural location and their inability to offer wages that are competitive with a nearby district.¹

Consequently, four out of 16 (25 percent) teachers in RISE tested areas at Juab Junior High are teaching without a professional teaching license endorsed in their subject taught. These educators have yet to complete a teacher preparation program relevant to the courses they teach, either through traditional higher education or an alternate pathway.

Juab School District has experienced some growth over the past six years. In the 2019-2020 school year, Juab School District moved its 6th graders into the Junior High School to free up space in its three elementary schools. The transition from elementary school to junior high was likely difficult for students, with teachers and administrators sharing that having 6th graders in the same school as students preparing to enter high school is not ideal. This impact was likely compounded by the COVID-19 pandemic, which forced the school to switch to virtual learning for several months.

The District and High School Should Plan More Interventions to Target Students that Experienced Learning Loss During COVID-19

Prior to the pandemic school year of 2020, Juab Junior High School students outperformed students in several peer schools in English language arts, science, and math. However, the pandemic year appeared to have a significant negative impact on students and now the school is performing worse than its peers. Now these students have entered high school, meaning that Juab High School may experience some setbacks that it should be prepared for. Juab High School's school plan for the 2022-2023 school year set a goal for a five percent improvement in ACT scores. It did not achieve this goal. Action steps listed in the plan focused on teaching learning skills, afterschool interventions, and professional development to achieve this goal. Juab High School should continue to work with Juab Junior High School to identify specific subjects and standards in which students scored poorly and develop interventions that specifically target those areas.



Juab Junior High School's test scores are lower than peer schools' s post-COVID in ELA, science, and math, suggesting potential challenges for Juab High School as these students progress.

¹ Lower wages are discussed in Chapter 1.



RECOMMENDATION 2.2

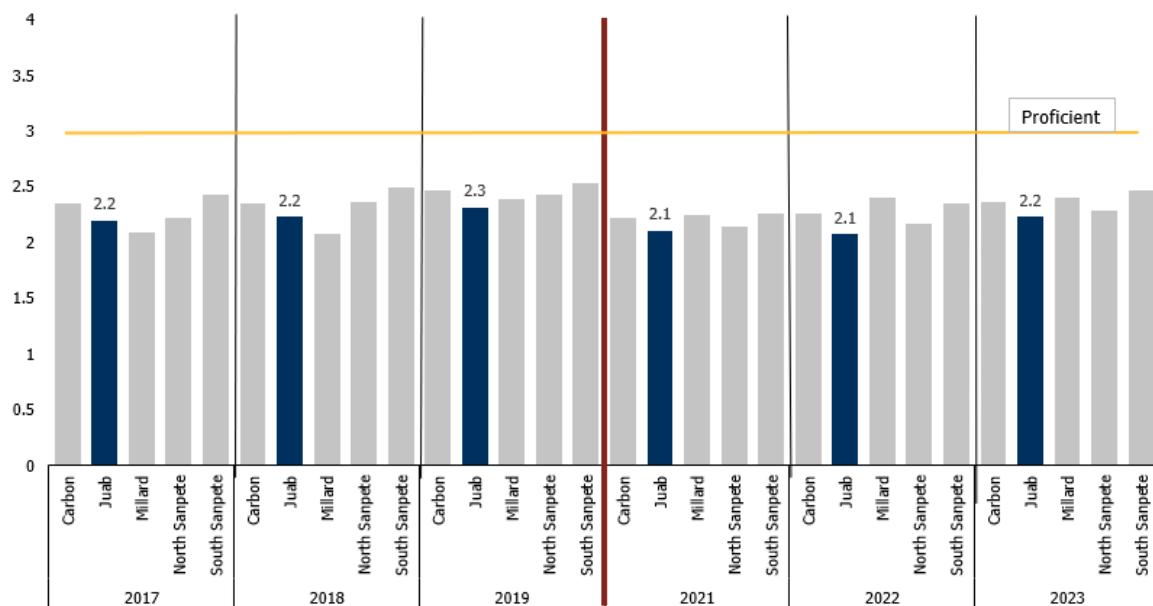
Juab High School should continue to work with Juab Junior High to identify specific subjects and standards in which students scored poorly and develop interventions that specifically target those areas.

2.3 Elementary School RISE Scores Are Low, But Some Subjects Show Improvement

Juab Elementary Schools Performs Below Peer Districts for English Language Arts RISE Proficiency

Since 2021, Juab elementary schools have performed below that of their peers on RISE English language arts testing. Prior to 2021, scores were also low in comparison to peers. Figure 2.2 shows Juab elementary school scores prior to and post COVID-19.

Figure 2.2 Elementary RISE ELA Proficiency Scores Show That Juab Elementary Schools Are Performing Below Their Peers. Juab Elementary Schools have not yet recovered from the learning loss that occurred during the pandemic. COVID-19 is represented by the red line.



Source: Auditor Generated from USBE data.



Similar to Juab's high and junior high schools, students at the three elementary schools have not yet returned to pre-COVID test scores in language arts and perform below their peers.

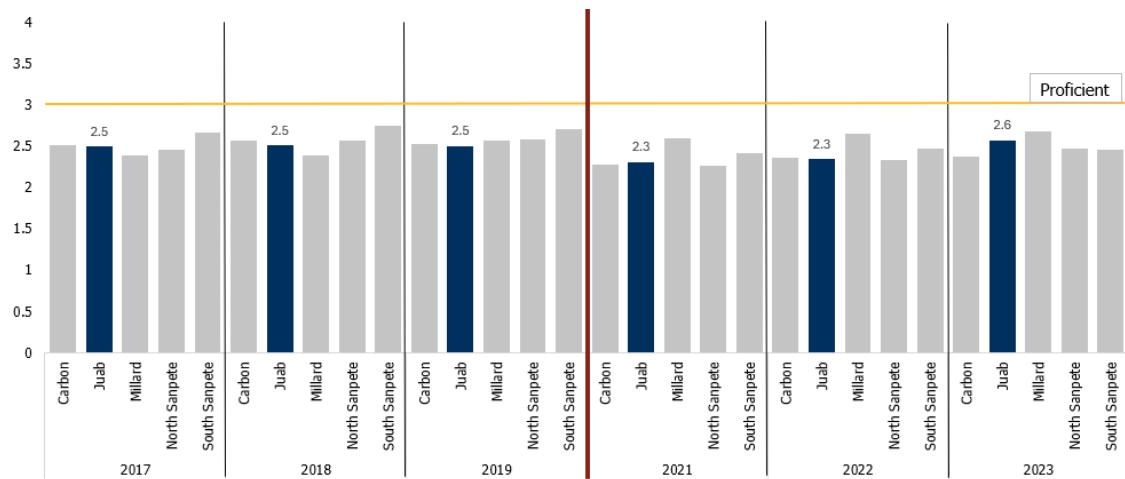
High Absenteeism at Elementary Schools May Contribute to Lower Test Scores

Absenteeism at Juab's three elementary schools is higher than both the junior high and high schools. It is also higher than many other elementary schools in peer districts. Surprisingly, the biggest increase occurred in 2021-2022 school year and not the year prior, suggesting that the increase has less to do with the immediate impact of COVID-19. Students missing critical learning opportunities likely score lower on evaluations and may continue to struggle to keep up with their peers. This could result in higher achievement gaps, making teachers' jobs more difficult. Juab School District should continue to engage with the parents of frequently absent students to determine the cause of the absenteeism and emphasize the importance of attendance on their children's ability to succeed in school. The district should also consider additional strategies to incentivize attendance for these students.

Elementary RISE Math Scores Have Returned to Pre-Covid Proficiencies

Elementary RISE math scores are the highest they've been in a six-year period. Scores dropped off moderately in the aftermath of the pandemic but have since fully recovered. Juab is second to only one peer in elementary math proficiency scores. Figure 2.3 shows how Juab compares to its peers.

Figure 2.3 Elementary Math Proficiency Scores Show District Improvements. Juab School District is currently second among its peers in elementary math scores. Covid is represented by the red line.



Source: Auditor Generated from USBE data.



Although there are areas for improvement, we are encouraged by the progress the district has made after experiencing significant learning loss.

RECOMMENDATION 2.3

Juab School District should continue to engage with the parents of frequently absent students.

RECOMMENDATION 2.4

Juab School District should consider additional strategies to encourage attendance in frequently absent students.

2.4 Juab School District Did Not Report Past English Language Learning Students, Resulting a Loss of Funding

Juab School District inadvertently did not report English Language Learning (ELL) students to USBE which resulted in a loss of funding for these students. While Juab has been following federal requirements to educate these students, the district has mistakenly not been reporting ELL numbers to USBE. This error occurred due to a connection issue between Juab's student database and USBE's database.

Utah funds ELL students through an increase of about 0.4 percent to the student's Weighted Pupil Unit funding, resulting in about \$171 additional dollars per student classified as ELL. Juab currently has about 60 ELL students, meaning the district has not received about \$10,300 per year in state funding dating back to at least 2017. This mistake also cost Juab about \$23 per ELL student of Federal Title III funding. According to the district they have never received any federal funding for ELL students.

When analyzing Juab's performance data, auditors were unable to analyze the academic success of ELL students and compare various at-risk students to peer districts. Since the notification of this error, Juab has worked to rectify the issue and has now correctly reported to USBE the 60 ELL students in the district.



RECOMMENDATION 2.5

Juab School District should continue to monitor English Language Learner reporting to the Utah State Board of Education and communicate yearly to make sure Juab is receiving funds.



BACKGROUND

Juab School District partners with ASU Prep to provide courses in the Statewide Online Education Program (SOEP). The Statewide Online Education Program is available to all Utah students regardless of whether they attend public or private school, or if they are home-schooled. Juab distributes almost \$3 million per year in state funds on behalf of students who take courses through ASU Prep Juab.

FINDING 3.1

Some Schools Utilize ASU Prep Juab for Partially In-person Learning, Raising Policy Questions About the Intent of the Statewide Online Education Program

RECOMMENDATION 3.1

The Legislature should consider clarifying the intent of statute to determine if participating schools' implementation model of in-person, scheduled learning should be funded through the Statewide Online Education Program.

FINDING 3.2

International Students Have Been Participating in ASU Prep Juab, Which Does Not Appear Consistent with Statute

RECOMMENDATION 3.2

Juab School District should ensure that only eligible students participate in the Statewide Online Education Program.

FINDING 3.3

A Gap in Oversight Lead to Excessive Student-to-Teacher Ratios

RECOMMENDATION 3.3

Juab School District should continue to ensure that student-to-teacher ratios do not exceed established limits.

RECOMMENDATION 3.4

Juab School District should continue to evaluate emerging research regarding appropriate and effective student-to-teacher ratios for hybrid classes.



CONCLUSION

Juab's SOEP allows some schools to engage in a hybrid model, in which they combine online resources with in-person learning. This arrangement is called a "cohort" in which students in the physical classroom are all enrolled in SOEP as a class. It is unclear, after working with stakeholders and reviewing statute with legislative attorneys, whether the cohort delivery system aligns with legislative intent because some students' full access could be inhibited.





Chapter 3

The Legislature Should Consider Policy Questions That Have Developed in Juab's Statewide Online Education Program

Juab School District (Juab or district) administers a statewide online education program (SOEP) provided by Arizona State University (ASU Prep Juab or the program).² Currently, there are no students enrolled in Juab School District who also chose to take courses through ASU Prep, administered by Juab. The majority of the students enrolled in the program are from home or private schools. The Statewide Online Education Program is available to all Utah students regardless of whether they attend public or private school, or if they are home-schooled.

The purpose of this audit was not to review ASU Prep and we accordingly provide no conclusions on that program. However, as part of the audit focused on Juab School District, we discovered some policy questions that have developed which we believe the Legislature should consider.

3.1 Some Schools Utilize ASU Prep Juab for Partially In-person Learning, Raising Policy Questions About the Intent of the Statewide Online Education Program

Juab's SOEP allows some schools to engage in a hybrid model, in which they combine online resources with in-person learning. This arrangement is called a "cohort" in which students in the physical classroom are all enrolled in SOEP as a class. Students not attending these specific schools, or who want to participate in SOEP and learn at an alternative pace may not be able to participate in a cohort and take advantage of the in-person learning portion. Students at schools utilizing cohort arrangements typically meet in-person multiple times per week, at a scheduled time, at their school of record with an in-person instructor.

Students not attending these participating schools must choose ASU Prep Juab's fully online option. However, ASU Prep Juab's fully online version is not heavily utilized. Additionally, not every school in Utah qualifies for SOEP funding when their students participate in SOEP, making the cohort style classes less desirable for those schools and thus less likely to be established. It is unclear, after working with stakeholders and reviewing statute with legislative attorneys, whether the cohort delivery system aligns with legislative intent because some students' full

² ASU Prep Juab is a separate entity from ASU Prep Global, which is another SOEP provider in Utah. In this audit, we focus only on ASU Prep Juab.



access could be inhibited. Therefore, we recommend the Legislature consider clarifying SOEP policy.

The Legislature Should Consider Whether SOEP Courses Should Contain Regular, In-person Learning

Our review found that schools and students using ASU Prep Juab courses are mostly using the hybrid cohort approach. While the district appears to have done



The purpose of the SOEP program is to provide learning opportunities at students' own pace, available exclusively online, for public, private, and homeschool students.

a good job managing the program and student outcomes are acceptable, the way these schools utilize ASU Prep Juab may not align with legislative intent for the SOEP program.

One stated purpose of SOEP program is to provide online learning opportunities for public, private, and homeschool students. Juab's SOEP program is authorized in statute as "an [Local Education Authority] LEA program, approved by the LEA

governing board, that is created, according to statute exclusively for the purpose of serving students online...".³ This phrase appears to require that the course must be offered exclusively online and not through in-person instruction. However, students are statutorily allowed to participate from any location, including their regular school, home, or a combination of the two.

The Utah State Board of Education (USBE) has authorized Juab's model of SOEP, knowing that schools use this hybrid, cohort model. To clarify policy questions, the Legislature should consider whether the purpose of SOEP is exclusively for online education. Further, if the cohort model is determined to be effective, the Legislature should also consider legislative changes to expand the cohort model.



USBE is aware of and has authorized Juab's model of SOEP.

Most ASU Prep Juab Courses Cannot Be Used Effectively for Asynchronous (Self-paced) Learning

Statute says that the purpose of online education is to promote "self-paced programs" and to "allow a student to customize [their] schedule."⁴ Because of the in-person nature of the cohort style, a student wishing to work at his/her own pace would not be able to fully participate. One reason for the establishment of

³ *Utah Code 53F-4-504 (1) (b)*

⁴ *Utah Code 53F-4-502 (3) (h)*



the SOEP program is to provide non-traditional students with access to asynchronous learning opportunities. Statute states:

Utah Code 53F-4-502:

"The purposes of the Statewide Online Education Program are to:... (f) provide personalized learning, where a student can spend as little or as much time as the student needs to master the material; (g) provide greater access to self-paced programs enabling a high achieving student to accelerate academically, while a struggling student may have additional time and help to gain competency; (h) allow a student to customize the student's schedule to better meet the student's academic goals..."

Statutory language generates policy questions for the Legislature to consider. Based on legal review provided by The Office of Legislative Research and General Counsel (OLRGC):

...in-person participation would undermine the self-paced, fully online structure the SOEP is designed to facilitate. Students would no longer have complete flexibility to progress through coursework on their own timeline. While some optional in-person offerings may be permissible, making them a requirement appears to facially conflict with the enabling statute's language and intent.⁵ Finally, statute states that "a student may enroll on an online course at any time during a calendar year" which is not conducive for courses that have regularly scheduled classroom time and follow a traditional school calendar.⁶

As mentioned previously, ASU Prep Juab offers a fully online option for most of the courses taught in the hybrid format. However, only 23 students have opted to participate fully online during the 2023-2024 school year. This may partially be due to the fact that the courses have scheduled, though not mandatory meeting



Only 23 Utah students chose to participate in ASU Prep Juab's fully online option in the last school

times, but it may also suggest that students and/or parents prefer being able to interact with teachers and classmates in-person.

Not All Utah Schools Receive SOEP Funding, Making Cohort-Style Participation Less Feasible and Thus Less Likely to Happen in Many Schools.

Private and small school⁷ participation in a cohort-style SOEP is more feasible

⁵ For complete OLRGC opinion, see Appendix B.

⁶ **Utah Code 53F-4-513 (2)**

⁷ In 2023, the Legislature made an exception for small high schools in which schools with under 1,000 students enrolled would not lose WPU when their students participate in SOEP.



than large public school participation. Large public schools do not receive SOEP funds to pay for students participating in the program, and instead lose a portion of their weighted pupil unit (WPU) when students participate in SOEP to pay the SOEP provider. This likely disincentivizes these schools from organizing full classroom participation in the cohort style.

Juab School District has made efforts to convince other school districts with small high schools to participate in ASU Prep Juab using the cohort model. However, it reports that districts have declined because the appropriation for small schools is limited.

RECOMMENDATION 3.1

The Legislature should consider clarifying the intent of statute to determine if participating schools' implementation model of in-person, scheduled learning should be funded through the Statewide Online Education Program.

3.2 International Students Have Been Participating in ASU Prep Juab, Which Does Not Appear Consistent with Statute

One school utilizing the cohort model has enrolled international students in ASU Prep Juab, who do not appear to be statutorily eligible to participate in Utah SOEP. These international students live with Utah residents while they are in Utah. The Utah residents only obtain a power of attorney for these students, which does not appear to be the same as legal guardianship. *Utah Code* states:

***Utah Code* 53F-4-501:**

"(4) "Eligible student" means a student...(B) whose custodial parent is a resident of Utah".

If the Utah resident is not considered a custodial parent, it calls into question whether the student qualifies to receive funding for that course. It is important to note that education statute defines "parent" as a parent or legal guardian.

OLRGC's legal opinion confirmed our analysis, stating:

An international student who is attending a private school or home school must also have a "custodial parent" that "is a resident of Utah" in order to participate



in the SOEP. This differs from an international student who is enrolled in a Utah LEA pursuant to existing enrollment laws in Utah code.

It states further:

A power of attorney is typically used to grant authority to an agent to make financial and property decisions on behalf of another party. In contrast, the Utah Code provides separate and distinct processes for establishing guardianship of a student that differ from a power of attorney arrangement.⁸

The school that allows international students to enroll in ASU Prep Juab accounts for about \$1.3 million annually in SOEP funds paid out. This school has several hundred international students. While the school obtains power of attorney for the host family, based on our legislative legal opinion, power of attorney does not meet the legal requirement of guardianship.

Inconsistent Guidance from USBE Likely Contributed to Juab School District Allowing Ineligible Students to Participate

During the course of the audit, we reached out to USBE to get clarification regarding the eligibility of international students. We were advised that the international student's natural parents remain legal guardians and therefore these students do not meet statutory eligibility criteria for SOEP unless they are enrolled in a public school. However, a "frequently asked question" (FAQ) document for students and parents on USBE's website contains contradictory information. The document states:

Foreign exchange students may enroll in the program while they are enrolled in a Utah public school or private school.

As of April 4, 2024, upon being notified of the concern by our office, USBE has issued definitive guidance disallowing foreign students regardless of whether they are enrolled in public or private schools. Still, inconsistent guidance from USBE likely contributed to Juab's misunderstanding.

RECOMMENDATION 3.2

Juab School District should ensure that only eligible students participate in the Statewide Online Education Program.

⁸ See Appendix B for legal brief.



3.3 A Gap in Oversight Led to Excessive Student-to-Teacher Ratios

An error on the part of Juab School District allowed for excessive student-to-teacher ratios in its SOEP program, based on Juab's internal standards and its use of the hybrid model. Specifically, one teacher was responsible for 474 students in



Four teachers from two different schools were allowed to exceed Juab's established cap of 300:1.

a semester. While we were unable to find credible research to determine reasonable student-to-teacher ratios for hybrid and/or fully online courses, we believe 474:1 is excessive. Citing a lack of external research and standards, Juab School District established a soft cap of 250:1 and a hard cap of 300:1.

We took an in-depth look into two schools that heavily utilize ASU Prep Juab for their students and found four teachers that exceeded Juab's cap. Once notified, the district took action to rectify the situation. The oversight likely occurred because a new district employee had just started running ASU Prep. Juab School District should continue to ensure that student-to-teacher ratios do not exceed established limits as well as continue to evaluate emerging research regarding appropriate and effective student-to-teacher ratios for hybrid classes.

RECOMMENDATION 3.3

Juab School District should continue to ensure that student-to-teacher ratios do not exceed established limits.

RECOMMENDATION 3.4

Juab School District should continue to evaluate emerging research regarding appropriate and effective student-to-teacher ratios for hybrid classes.



3.4 Juab Can Increase the Benefits of Its Partnership with ASU Prep

Juab's contract with the provider grants unlimited free access to all ASU Prep materials, including curriculum. Given that the district struggles to keep up with teacher salaries offered by peers and nearby districts, taking advantage of free curriculum may be advantageous. Curriculum is often very expensive.

Additionally, some Juab teachers must develop their own curriculum which can be labor intensive, leading to higher workloads. Currently, only five teachers have reported utilizing any materials from ASU Prep, despite a diverse offering of courses and lessons from 7th through 12th grade. Juab School District is a 1:1 district which means that all students have a tablet. The district also receives six percent of total SOEP funding back from ASU Prep which mostly just covers the cost of administration. Encouraging teachers to utilize materials from ASU Prep Juab may also reduce the workload for teachers who have to develop curriculum.⁹

Juab School District should also continue to promote ASU Prep Juab to districts with small high schools that do not have to worry about losing WPU funds if their students participate in SOEP. Because Juab's administrative fee is tied to a percentage of total funds received by ASU Prep, Juab would benefit from expanding ASU Prep Juab. Currently, there is \$795,000 in state funds available for small school participation in SOEP.



Currently, only seven teachers have reported utilizing any materials from ASU Prep, despite a diverse offering of courses and lessons from 7th through 12th grade.

⁹ High teacher workloads are discussed in Chapter 1.





Complete List of Audit Recommendations





Complete List of Audit Recommendations

This report made the following twelve recommendations. The numbering convention assigned to each recommendation consists of its chapter followed by a period and recommendation number within that chapter.

Recommendation 1.1

Juab School District should continue to look for ways to raise teacher salaries to better align with compensation in nearby districts.

Recommendation 1.2

Juab School District should add metrics to its strategic plan to determine the effectiveness of district-wide initiatives.

Recommendation 2.1

Juab School District should engage with its stakeholders to develop consistent policies and provide education to staff on the implementation of competency-based grading.

Recommendation 2.2

Juab High School should continue to work with Juab Junior High to identify specific subjects and standards in which students scored poorly and develop interventions that specifically target those areas.

Recommendation 2.3

Juab School District should continue to engage with parents of frequently absent students.

Recommendation 2.4

Juab School District should consider additional strategies to encourage attendance in frequently absent students.

Recommendation 2.5

Juab School District should continue to monitor English Language Learner reporting to the Utah State Board of Education and communicate yearly to make sure Juab is receiving funds.

Recommendation 3.1

The Legislature should consider clarifying the intent of statute to determine if participating schools' implementation model of in-person, scheduled learning should be funded through the Statewide Online Education Program

Recommendation 3.2

Juab School District should ensure that only eligible students participate in the Statewide Online Education Program.

Recommendation 3.3

Juab School District should continue to ensure that student-to-teacher ratios do not exceed established limits.

Recommendation 3.4

Juab School District should continue to evaluate emerging research regarding appropriate and effective student-to-teacher ratios for hybrid classes.



Appendices





A. The District has Implemented Various Programs to Encourage Teacher Retention and Foster Less Experienced Teachers



Teacher Leadership Program Helps Teachers Increase Salary

Juab's Teacher Leadership Program is a way to recognize and compensate master teachers within the district. This initiative offers a 5 percent pay increase to eligible teachers and staff upon completion of specific professional development criteria. Currently, Juab has 31 staff members receiving this designation and a corresponding pay increase. To maintain this distinction and continued pay increase, teachers are required to recertify every three years, completing new professional development standards. Only two teachers who had initially earned their teacher leadership designation chose not to renew. Juab School District should continue to monitor the effect of this program to determine its effectiveness at retaining highly effective educators.

Instructional Coach Program Helps Mentor Teachers

Many teachers reported the value of Juab's positive use of instructional coaching. The goal of Juab's instructional coaches is to make sure each student has access to a highly skilled teacher. Instructional coaches strive to achieve this goal through partnership with teachers.

Instructional coaches take on the role of mentors in new teacher meetings. Coaches meet with first-year teachers weekly, second-year teachers every other week, and third-year teachers monthly; gradually decreasing the frequency of these meetings if they are no longer needed. During these meetings, coaches offer guidance on a range of topics including substitute teacher plans, classroom set-up, lesson organization, and goal setting.

Experienced teachers have the option to request informal observations and personalized coaching cycles from their assigned coach to focus on specific areas for improvement. In our interviews with teachers, many expressed gratitude for the valuable support provided by their coach, which has contributed to their improvement in the classroom. Overall, instructional coaches play a crucial role in supporting and enhancing the professional development of teachers, thereby contributing to the overall quality of instruction within the school community. Juab's commitment to fostering this program reflects its dedication to the ongoing growth and success of its educators.

Teachers Have Access to Personalized Professional Development

Juab's priority to personalized learning extends not only to its students but also to its teachers. By implementing outsourced micro-credentials and in-district personalized training, teachers have the opportunity to select courses that align with their specific areas of growth and professional development requirements.

These courses are typically available asynchronously, enabling teachers to engage in professional development at their convenience. Since Juab started promoting micro-credentials in 2016, 134 teachers have taken advantage of this option at least once. This customized approach guarantees that teachers can access learning opportunities that directly address their individual goals, fostering continuous improvement and enhancing their effectiveness in the classroom.

B. Office of Legislative Research and Counsel Legal Opinion





Office of Legislative Research and General Counsel

W210 State Capitol Complex | Salt Lake City, UT 84114 | Phone: 801.538.1032

John Q. Cannon, Director
Victoria Ashby, General Counsel

Memorandum

To: Darin R. (DRU) Underwood, CIA, Office of Legislative Auditor General

From: Jeffrey Van Hulten, Associate General Counsel

Date: April 15, 2024

Re: Interpretation of Statutory Provisions Regarding the Statewide Online Education Program

Dear Mr. Underwood:

You have asked for a legal opinion regarding the following two questions related to the Statewide Online Education Program (SOEP) under Utah Code Title 53F, Chapter 4, Part 5.

Question 1: Does the Utah Code allow an LEA, via a power of attorney document, to be a "guardian" for international students in order for the international students attending a private or home school to meet the definition of an "eligible student" under the SOEP?

In framing the issue more specifically, the SOEP code allows an "eligible student" to enroll in online courses and defines an "eligible student" to be a student:

- "(a) who intends to take a course for middle school or high school credit; **and**
- (b)(i) who is enrolled in an LEA in Utah; **or**
- (ii)(A) who attends a private school or home school; and
- (B) whose custodial parent is a resident of Utah.

Therefore, an international student who is attending a private school or home school must also have a "custodial parent" that "is a resident of Utah" in order to participate in the SOEP. This differs from an international student who is enrolled in a Utah LEA pursuant to existing enrollment laws in Utah code.

In order to establish a "custodial parent," more commonly referred to in code as the "legal guardian" for an international student at a private school or in a



Office of Legislative Research and General Counsel

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home school, can LEA can act as the "custodial parent" or guardian via a power of attorney document? Based on my analysis, the answer is no.

A power of attorney is typically used to grant authority to an agent to make financial and property decisions on behalf of another party. In contrast, the Utah Code provides separate and distinct processes for establishing guardianship of a student that differ from a power of attorney arrangement.

Specifically, Utah Code Section 53G-6-303 allows a school district to establish guardianship for the purpose of allowing a student to be considered a resident of the school district. Additionally, Section 75-5-206 establishes a court-ordered process for appointing a guardian for a minor.

These code provisions demonstrate that guardianship in the context of education is handled through processes separate from a power of attorney. The code is silent on this issue as it pertains to charter schools and focuses solely on school districts. However, it is clear the Legislature intended guardianship to be distinct from a power of attorney relationship. Therefore, an LEA likely cannot use power of attorney to meet the "eligible student" requirement for international students at a private school or home school under the SOEP.

Question 2: Does requiring some in-person elements for online courses provided through the SOEP violate the enabling statute?

Based on the plain language and stated purposes of the SOEP statute, requiring in-person elements would likely run afoul of the law's intent. There are several key reasons:

1. The statute emphasizes the self-paced nature of the SOEP as a core purpose. Section 53F-4-502 states the legislative purpose and lists "self-pacing" as a direct objective in two separate subsections:
 - (a) Subsection (3)(d): "utilize the power and scalability of technology to customize education so that a student may learn in the student's own style preference and at the *student's own pace*"
 - (b) Subsection (3)(g): "provide greater access to *self-paced* programs enabling a high achieving student to accelerate academically, while a struggling student may have additional time and help to gain competency"
2. Section 53F-4-514(3)(a)(iv)(D) solidifies the self-pacing purpose by requiring the State Board of Education to make rules allowing "open entry and exit" so a student has flexibility to "progress through course material at the *student's own pace*."



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Victoria Ashby, General Counsel

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3. Section 53F-4-504 outlines the four entities that can be an authorized online course provider. Subsection (1)(b) specifies that an LEA program approved by the LEA governing board must be "created *exclusively* for the purpose of serving students *online*." This plain language coupled with the aforementioned self-pacing language indicates the Legislature's intent for LEA programs under the SOEP to be fully online.

4. Section 53F-4-503, which covers requirements for student enrollment in SOEP courses, does not provide any allowable enrollment limitations based on a student's ability to attend in-person sessions. This aligns with the "exclusively online" purpose of LEA programs offering courses through the SOEP.

Mandating in-person participation would undermine the self-paced, fully online structure the SOEP is designed to facilitate. Students would no longer have complete flexibility to progress through coursework on their own timeline. While some optional in-person offerings may be permissible, making them a requirement appears to facially conflict with the enabling statute's language and intent.

In summary, using a power of attorney to establish guardianship likely does not satisfy the "eligible student" criteria under the SOEP needed for international students enrolled in private or home school settings, and requiring in-person elements for SOEP courses would be inconsistent with the enabling legislation on its face and as applied. Please let me know if you have any additional questions.

Sincerely,

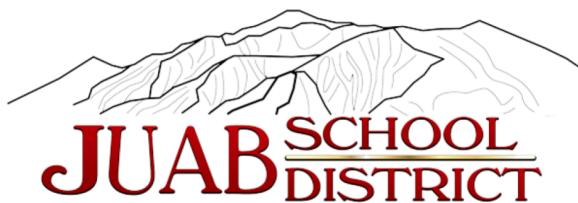
Jeffrey Van Hulten
Associate General Counsel
Office of Legislative Research and General Counsel





Agency Response





Legislative Audit Response

May 8, 2024

Thank you for the opportunity to provide a written response to the Systemic Review of Juab School District. We are grateful for the professionalism of the auditors and welcome the chance to improve our operations. We look forward to spending more time exploring this report and determining ways to respond appropriately to recommendations from the audit committee.

Juab School District is committed to its mission and vision. We seek to provide a flexible, personalized, and blended learning pathway to success for all students characterized by individual student mastery of standards. We have included a brief response to each recommendation below:

Chapter 1: Teachers in Juab School District Have Fewer Years of Experience Than Average	
Recommendation	JuabSD Response
1.1 Juab School District should continue to look for ways to raise teacher salaries to better align with teacher compensation in nearby districts.	Absolutely. Increasing teacher salaries to align with neighboring districts is crucial for attracting and retaining quality educators. <ul style="list-style-type: none">In the upcoming fiscal year, district administration and Board of Education will continue its taxing and management efforts to support teacher retention. Contact Dr. Hughes, Superintendent, for follow-up.
1.2 Juab School District should add metrics to its strategic plan to determine the effectiveness of district-wide initiatives.	We agree that incorporating additional metrics into the strategic plan will help us evaluate the impact and effectiveness of district-wide initiatives over time. <ul style="list-style-type: none">Our Strategic Plan 2.0 is drafted to include such metrics and will be adopted for implementation by October 1, 2024. Contact Dr. Hughes, Superintendent, for follow-up.

Chapter 2: Juab School District Has Seen Some Academic Improvements Post-COVID, but More Can Be Done	
Recommendation	JuabSD Response
2.1 Juab School District should engage with its stakeholders to develop consistent policies and provide education to staff on the implementation of competency-based grading.	We are in the process of developing a reboot for all stakeholders. A dramatic turnover of employees and an influx of parents who were not part of our school system when competency-based grading was first implemented necessitates this reboot.

Chapter 2: Juab School District Has Seen Some Academic Improvements Post-COVID, but More Can Be Done		
Recommendation		JuabSD Response
		<ul style="list-style-type: none"> • In the 2023-24 school year, we have focused on data-gathering, planning, and development; this will ensure preparation for policy and education campaigns in the 2024-25 school year. All implementation will be assessed every six months. Contact Dr. Hughes, Superintendent, for follow-up.
2.2	Juab High School should continue to work with Juab Junior High to identify specific subjects and standards in which students scored poorly and develop interventions that specifically target those areas.	<p>District leaders will collaborate to implement the district instructional framework in the 2024-25 school year. School teams will continue to collaborate, analyze, and identify specific areas for improvement.</p> <ul style="list-style-type: none"> • Educators will evaluate data from multiple metrics, including standardized testing, classroom assessments, and teacher observations. Using this data, school teams will develop targeted interventions that address areas of low performance. Regular progress monitoring will assess the effectiveness of interventions to inform instruction. Contact Director Sandra Nielsen for follow-up.
2.3	Juab School District should continue to engage with parents of frequently absent students.	<p>Yes, engaging with parents of frequently absent students is essential when addressing attendance issues and supporting student success.</p> <ul style="list-style-type: none"> • To support this practice, additional resources (digital tools or systems) will be evaluated in the 2024-25 school year. Contact Director Sandra Nielsen for follow-up.
2.4	Juab School District should consider additional strategies to encourage attendance in frequently absent students.	<p>Yes, school principals will continue to use multiple strategies to address student absences and encourage attendance. Student support teams focus on engaging parents and their chronically absent students with increased contact and communication efforts. Additionally, classroom teachers leverage engagement strategies throughout Tier 1 instruction to encourage student attendance and emphasize the value of being present regularly for classroom instruction and interactions.</p> <ul style="list-style-type: none"> • Progress monitoring will take place at the end of each academic quarter and year for evaluation and assessment. Contact Director Sandra Nielsen for follow-up.
2.5	Juab School District should continue to monitor English Language Learner reporting to the Utah State Board of Education and communicate yearly to make sure Juab is receiving funds.	District office staff and school secretaries will receive additional training before August 1, 2024, to ensure that enrollment of ELL students is accurately captured in PowerSchool (SIS).

Chapter 2: Juab School District Has Seen Some Academic Improvements Post-COVID, but More Can Be Done	
Recommendation	JuabSD Response
	<ul style="list-style-type: none"> Effective immediately, Director Sandra Nielsen will engage with USBE to ensure that reporting is fully compliant by May 30, 2025.

Chapter 3: The Legislature Should Consider Policy Questions that Have Developed in Juab's Statewide Online Education Program	
Recommendation	JuabSD Response
3.1 The Legislature should consider clarifying the intent of statute to determine if participating schools' implementation model of in-person, scheduled learning should be funded through the Statewide Online Education Program.	<p>Yes, legislative support will help all Statewide Online Education Program (SOEP) providers to clarify the intent of statute in determining proper implementation. We will continue to administer the Statewide Online Education Program (SOEP) as directed by USBE.</p> <ul style="list-style-type: none"> Assistant Superintendent Royd Darrington will follow up with USBE on August 1, 2024, to see if any changes need to be made to the operations of ASUPD.
3.2 Juab School District should ensure that only eligible students participate in the Statewide Online Education Program.	<p>We agree with this recommendation; we have always worked directly under the supervision of the Utah State Board of Education (USBE) to only serve those students who USBE approved through the SEATS system. JuabSD has ongoing concerns about the ability of USBE's administrative SEATS system to appropriately identify students who are not eligible for the SOEP program participation.</p> <p>We will continue to work closely with USBE and other SOEP providers to find solutions to improve the system. Effective immediately, ASUPD has received direction clarifying the enrollment of eligible students into the SOEP.</p> <ul style="list-style-type: none"> On April 15, 2024, Assistant Superintendent Royd Darrington notified all private schools of the direction and guidance received from USBE concerning eligible students.
3.3 Juab School District should continue to ensure that student-to-teacher ratios do not exceed established limits.	<p>Yes, we acknowledge an error in training a new employee to identify an online course instructor with more students assigned to them than the internal standards we have set.</p> <ul style="list-style-type: none"> The error was remedied immediately by Assistant Superintendent Royd Darrington upon being brought to our attention and we do not foresee future issues with managing our teacher-to-student ratios. We do not recognize this as a systemic problem in our online courses or within our traditional classrooms.

Chapter 3: The Legislature Should Consider Policy Questions that Have Developed in Juab's Statewide Online Education Program	
3.4	Juab School District should continue to evaluate emerging research regarding appropriate and effective student-to-teacher ratios for hybrid classes.

Thank you again for the opportunity to reflect and improve our practices. We will continue working tirelessly to meet the needs of each student within our district.

Sincerely,



Dr. Kodey Hughes
Superintendent of Schools
Juab School District



Linda Hanks
Board President
Juab School District



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