

October 1, 2025

Shane Wahls  
Superintendent  
131 South River Park Dr.  
PO Box 520  
Guttenberg, Iowa 52052

Dear Superintendent Wahls:

This letter is official verification that the Iowa Virtual Academy (IVA) attendance center at the Clayton Ridge School District has been granted conditional accreditation as an online school for the 2025-2026 school year, in accordance with [Iowa Code 256.9\(55\)](#) and Iowa Administrative Code 281—15.5(256). This means the school must provide evidence of compliance with the following items in order to be considered eligible for potential approval as an online school for the 2026-2027 school year.

The Department of Education received concerns regarding student attendance, student records, communication to parents and resident districts and student assessments. As part of the review process the Department of Education requested documents from the Clayton Ridge School district. Based on the review of the documents submitted and records at the Department of Education the following noncompliance items and required actions are listed below.

1. **Student Records:** 281—Iowa Administrative Code 12.3(4) requires districts to maintain student records. A review of data submitted by the Clayton Ridge CSD indicated 3028 students were enrolled at some point during the year and 1747 students were exited by IVA. The Clayton Ridge CSD IVA attendance center data submitted to the Student Reporting in Iowa (SRI) indicated only 63 students exited. This is a discrepancy of 1684 (1747-63) students in SRI. At the end of each quarter, the Clayton Ridge CSD will provide the Department with a list of the students by ID number and residence district. The spreadsheet should include date of enrollment, days of attendance and date of exit, if applicable, from the Iowa Virtual Academy since the start of the school year.
2. **Student Attendance:** Evidence provided by Clayton Ridge CSD and IVA did not indicate all previous attendance records were ported into the JMC system. IVA will provide verification of attendance data provided for the resident district and parents of students open enrolled in the Iowa Virtual Academy.
3. **Chronic Absenteeism:** [Senate File 2435](#) details public school attendance requirements. Department review of documentation provided by Clayton Ridge CSD regarding the IVA attendance center related to chronic absenteeism indicated the district has a process to notify parents and resident districts for open enrolled students. However, based on communication from districts and documents from Clayton Ridge CSD, it does not appear communication is sent on a regular basis. At the end of each quarter, the Clayton Ridge CSD will provide the Department with documentation of communication sent to IVA parents and resident districts, if the student is open enrolled, that met the requirements of SF 2435.
4. **Special Education Billing:** Moneys received by the school district of the child's residence for the child's education, derived from moneys received through chapter 257 and 273.9 shall be paid by the school district of the child's residence to the appropriate education agency, private agency, or other school district providing special education for the child pursuant to contractual arrangements as provided in section 273.3, subsections 5 and 6. ([Iowa Code § 256b.2](#)) In FY25, Clayton Ridge billed other districts for a total of 143 students.

- a. Incorrect number of days billed (Clayton Ridge billed for more days than they should have)
  - i. 1 student was exited from special education on 11/20/2024, but was billed for the full year.
  - ii. 1 student was exited from special education on 11/6/2024, but was billed for the full year.
  - iii. 1 student was exited from special education on 5/7/2024, but was billed for the full year.
  - iv. 1 student was enrolled for a total of 164 days, but was billed for the full year.
  - v. 1 student enrolled on 10/28/2024 and exited from special education on 10/18/2024, but was billed for 106 days.
- b. Inconsistent number of days billed for special education. Without an explanation of why the number of days billed for special education is less than the number of days attended, the impact is unknown.
  - i. 1 student enrolled 179 days, but was billed for 43 with no exit date or initial IEP date during the school year.
  - ii. 1 student enrolled 179 days, but was billed for 127 with no exit date or initial IEP date during the school year.
  - iii. 1 student enrolled 179 days, but was billed for 126 with no exit date or initial IEP date during the school year.
  - iv. 1 student enrolled 179 days, but was billed for 101 with no exit date or initial IEP date during the school year.
  - v. 1 student enrolled 179 days and was exited from special education on 12/12/24, but was billed for 0 days.

Clayton Ridge incorrectly billed districts for students for days the student was not served pursuant to an IEP. In addition, it appears there are students whose home districts should have been billed for IEP services, but were not billed the number of days of enrollment.

The Department will complete an audit of Clayton Ridge IVA open enrollment billing, including a review of billing procedures and protocol.

5. **Student Assessment:** Iowa Code 256.7(21)(b)(2) and 279.60(3) requires districts to ensure all students complete the Iowa Statewide Assessment of Student Progress (ISASP). Documentation provided by the Clayton Ridge CSD IVA attendance center was unclear on how the district ensured all students attending the IVA attendance center complete the ISASP. In March Clayton Ridge CSD will provide the Department with a spreadsheet with student ID numbers for students currently attending IVA and date of the assessment. In May IVA will update the spreadsheet to include the date of ISASP completion.
6. **IEP meetings:** Documentation provided by Clayton Ridge was unclear if IEP meetings were held for IEP students that fall within the chronic absenteeism criteria. At the end of each quarter, the Clayton Ridge CSD will provide the Department with documentation of communication sent to IVA parents and resident districts, if the student is open enrolled, that met the requirements of SF 2435. Documentation should include: prior written notice that includes a plan of action to support attendance, a change to an existing BIP aligned with attendance and consideration of other related supports to assure that the student has access and support.

Eric Heitz and Buffy Campbell will contact you to discuss next steps.

Sincerely,

Dr. Corey Seymour  
Bureau Chief of School Improvement  
Iowa Department of Education  
Grimes State Office Building  
Des Moines, IA 50319  
Phone: 515-326-0162

CC: Tina Wahlert, Division Administrator: [tina.wahlert@iowa.gov](mailto:tina.wahlert@iowa.gov)  
Leisa Breitfelder, Division Administrator, [leisa.breitfelder@iowa.gov](mailto:leisa.breitfelder@iowa.gov)  
Mike Cavin, Executive Director, [mike.cavin@iowa.gov](mailto:mike.cavin@iowa.gov)  
Buffy Campbell, Education Program Consultant, School Improvement: [buffy.campbell@iowa.gov](mailto:buffy.campbell@iowa.gov)  
Stefanie Edler, Administrative Consultant, [stephanie.edler@iowa.gov](mailto:stephanie.edler@iowa.gov)  
Buffy Campbell, School Improvement Consultant, [buffy.campbell@iowa.gov](mailto:buffy.campbell@iowa.gov)  
Eric Heitz, Administrative Consultant, School Improvement: [eric.heiz@iowa.gov](mailto:eric.heiz@iowa.gov)