



Chairman Duffey, Vice Chair Perales, Ranking Member Ramos and members of the Higher Education Subcommittee, my name is Charles See. I am an Assistant Deputy Chancellor at the Ohio Department of Higher Education (ODHE), and I, along with Dr. Stephanie Davidson, Vice Chancellor for Academic Affairs at ODHE, will be providing additional testimony on the College Credit Plus program.

I would first like to thank the committee for inviting ODHE back to testify. The committee has done an exceptional job at gathering information on the College Credit Plus program (CCP) from multiple perspectives. At the Chairman's request, today we will be providing the committee with additional information on the current structure and operation of the College Credit Plus program, addressing some of the concerns raised in testimony, and again offering our perspective on how the proposed changes in House Bill 474, coupled with current structures in existing CCP law and regulations, will improve the program going forward.

Overview

Study after study conclude that students participating in high quality dual enrollment programming have the capacity to reduce their time to degree, greatly improve their chances at persisting at the postsecondary level, and can substantially reduce their overall cost of postsecondary attainment. The CCP program represents Ohio's high-quality dual enrollment opportunity for Ohio students. The program offers a cost-effective pathway for more college-ready students to gain access to, and complete, postsecondary coursework while in high school, which in turn provides students the opportunity to reduce the cost of their postsecondary education moving forward.

The CCP program is currently in its first year of operation. One of things clear from the feedback ODHE and ODE have received thus far is that the secondary and postsecondary communities are still in the process of acclimating to new CCP laws, rules and regulations. This is to be expected, and as with any new program, time is needed to transition from old rules and practices to new standards, policies and procedures.

Very preliminary data show some of the early successes for the CCP program. There appears to be a substantial increase in interest from students and parents in dual enrollment opportunities. Participation numbers (which need to be confirmed) appear to be higher than previous dual enrollment programs (**number**). We further estimate that in its first year of operation, CCP has already saved students and parents more than \$60 million in postsecondary cost. Complete first-year program data is due to the Chancellor by July 15, 2016. We look forward to analyzing this data and using it to make recommendations for improving CCP moving forward.

Prior to addressing some of the specific concerns relating CCP outlined in previous testimony, I would like to provide the subcommittee with a brief overview of how the CCP program was established and talk generally about the program's current operational structure.

House Bill 59 of the 130th General Assembly required the Chancellor of Higher Education to make recommendations for establishing the CCP program, whereby high school students could earn college credit at Ohio institutions of higher education. Per the legislation, the Chancellor was required to consult

with the Inter-University Council of Ohio, the Association of Independent Colleges and Universities of Ohio, the Ohio Association of Community Colleges and the Superintendent of Public Instruction. In order to ensure that as many voices as possible were heard prior to establishing the recommendations for CCP, the Chancellor expanded the groups consulted with to include superintendent organizations, school board organizations, principal organizations, private high school organizations, career tech organizations and school business official organizations.

At one of the early meetings of the consultant groups, a consensus process was conducted to determine the primary issues that needed to be addressed in the establishment of a new dual enrollment system. The analysis started with a review of the state's current dual enrollment options. The process yielded the following "high priority" issues that the CCP program needed to address:

- Lack of quality and consistent information regarding dual enrollment opportunities
- Arbitrary eligibility requirements
- Inequitable grading policies which disadvantaged dual enrollment students
- Unpredictable costs to students to participate in the program
- Lack of available dual enrollment offerings
- Inconsistent quality of dual enrollment programs
- Varied teacher credential standards for dual enrollment instructors.

In addition to identifying the issues that the program should address, the group also identified a core set of principles upon which the program should be based, which included:

- Students must always be the primary focus and beneficiary of education policy.
- It is the responsibility of K-12 and higher education institutions to work collaboratively and think innovatively in order to advance the achievement and success of Ohio's students;
- The College Credit Plus program should be structured to ensure open access to all college-ready students with minimal need for contributing student resources;
- There must be flexibility in the College Credit Plus program in order to encourage innovation;
- Increasing the participation rates of underrepresented and low income student populations in programs that result in higher graduation rates and postsecondary persistence is an important education priority for the state;
- Providing students with the opportunity for career exploration and promoting exposure to relevant college courses while in high school has value to students, parents and the state.

Current CCP Structure

Participation

- All college-ready students in grades 7-12 can participate
- Public high schools and college must participate in the program
- Private high schools and colleges may participate in the program
- Students must declare their intent to participate in the program by April 1 of each year, but can issue notice of intent as early as February 15 of each year.

- Students must apply to institutions of higher education and be granted admission.
- Admissions decisions must be determined using the same criteria for all incoming students (CCP administrative regulations require an additional step for institutions that don't normally require an assessment as part of its regular admissions process. See OAC 3333-1-65.3).
- Private and home-school students must also apply to the Ohio Department of Higher Education for funding.
- Public and nonpublic schools are prohibited from denying students meeting the eligibility criteria from participating in the program.
- Students may participate in CCP during the summer.

Required Information and Services (Secondary Schools)

- Provide general information regarding the program prior to March one of each year
- Provide counseling services to students regarding consequences and benefits of the program
- Post information on the program on school website
- Host an information night along with colleges in the school district's region
- Implement a grading policy that does not disadvantage CCP students
- Report required data to the state

Required Information and Services (Colleges and Universities)

- Provide timely notice of admission (14 days prior to start of class)
- Provide students and secondary school courses and hours of enrollment
- Promote CCP on its website
- Provide professional development for high school teachers teaching their course
- Conduct classroom observation on courses taught at the high school by high school teachers
- Provide each participating student with an academic advisor
- Report required data

Calculation of Eligible Semester Hours and Calculation of High School Credit

- CCP students are eligible to take up to 30 semester hours or up to 45 quarter hours in one academic year
- Three or above semester hours earned for a single course converts to one full high school unit
- CCP limits the total number of potential earned credits in CCP to 120 over the course of a secondary student's education career

CCP Funding

- Established a cap on the total amount of dollars per pupil which could be utilized for CCP participation (83% of the foundation amount)
- Established caps on the maximum (ceiling) and minimum (floor) per credit hour amounts that can be charged to districts
- Established procedures for negotiating a per-credit-hour amount between the floor and ceiling
- Established procedures for requesting approval to charge a per-credit-hour amount below the statutory floor
- Permits CCP courses to be taught in different educational environments and establishes price structures for each
- Establishes default funding mechanisms in instances where districts and IHE are unable to reach agreements

- Limits instances where students can be charged for CCP participation to attendance at participating private IHEs
- Precludes students that have been identified as economically disadvantaged from being charged for participation in CCP
- Establishes separate appropriations for chartered non-public, non-chartered non-public and home school participation in CCP
- Requires schools districts to be responsible for books
- Requires colleges and universities to waive fees

Course Quality

- CCP courses may be offered in the high school on campus or on-line
- The course offering must be the same course that the college or university offers and not be a variation of the high school course
- The course must follow the colleges pre-determined syllabus and not be constructed based upon all or part of the high school syllabus
- The instructor of the course must meet ODHE requirements for postsecondary instruction
- The college or university must use their assessment methodology in the course

Reimbursement for Poor Performance

- School districts can seek reimbursement from a student if they withdraw from a course after 14 days or fail to obtain a passing grade in a course.
- Under no circumstances can a district seek reimbursement from a student that is determined to be economically disadvantaged, regardless of grade or regardless of drop date
- Schools have the burden of determining the economic status of a student prior to taking any action to seek reimbursement

Advisory Council

- The Chancellor is charged with establishing a CCP Advisory Council
- The Council assists the Chancellor and Superintendent with the following:
 - Establishing performance metrics for the program.
 - Monitoring the program moving forward.
- The first meeting of the Advisory Committee is scheduled on June 22, 2016

Proposed Changes in House Bill 474

In addition to the formal process of collecting CCP data, ODHE and ODE have been committed to monitoring the progress of CCP implementation through continuous communications with education practitioners. This process has led to the identification of several issues that we believe require on-going attention.

Two of the identified issues are reflected in the language of House Bill 474. These provisions give the Chancellor rule making authority to determine the specific courses that the state will fund in the CCP program and require the Chancellor to determine the circumstances under which students who underperform in CCP are allowed to continue in the program. The language was proposed in response to

concerns that students may be participating in courses that don't support degree completion and that the current regulations do not provide enough protection for students from during irreparable harm to their academic standing through underperformance. As with all aspects of the CCP program the proposed language requires the Chancellor to establish a mechanism for gathering input from the secondary and postsecondary education community as part of the rules development process.

ODHE and ODE are tracking additional issues which we plan to address utilizing the current Advisory Council Structure.

The legislation also establishes a pilot for a co-requisite remediation model within CCP. Under the model school districts and postsecondary institutions work in partnership to establish a process whereby identified high school seniors can participate in programing that provides remedial and college level content within the same English or math course. The partners would need to apply to be a part of the pilot process and only three pilots are to be approved. The goal of the program is to evaluate the success of providing high school seniors with an evidence-based pathway that has shown success in remediating minor academic deficiencies while allowing the student a better opportunity to persist in postsecondary education. There is clear evidence that shows that students who participate in exclusive developmental education at the postsecondary level are much less likely to move to credit bearing courses.

Addressing Specific Concerns

Program Quality

Issue:

A uniform standard is needed for determining college readiness

Current CCP law requires students to be admitted to an IHE as a condition of participating in the program. Students must be evaluated by the IHE using the same admissions criteria established for all students seeking admissions to the institution. In conjunction with the IHE's traditional admissions requirements, students must take an objective assessment (ACT, SAT, Accuplacer), administered by the IHE. The results of these assessments must be considered as part of the admissions decision.

Prior to CCP, districts had significant control over determining the students that would be permitted to participate in dual enrollment programs. Across the state there was a wide variance in eligibility requirements, both academic and non-academic, which generally targeted a narrow group of potential participants. This circumstance lead to the perception that eligibility requirements were sometimes arbitrarily established and lacked the flexibility to identify otherwise qualified students.

The language in CCP requiring that students go through the same admissions process that all college seeking students go through has already established a uniform process for determining college readiness. Again the program data that will be collected will provide a clear picture of where students start in the program and how they perform

While the current statutory structure sets a solid foundation for requiring postsecondary institutions to determine college readiness, ODHE and ODE are open to continuing to review standards for making this

determination. We believe however that the CCP Advisory Council established by the General Assembly is the correct forum for the continuation of this conversation.

Issue:

There needs to be metrics for comparisons between college level courses that qualify for CCP and courses available at the high school level.

The CCP program is designed for high school students to engage in an authentic college experience. This means that the courses taken by the students must be the same courses offered to all other students of the IHE. CCP students must be taught from the same syllabus, take the same assessments and be subject to the same grading procedures as those required for any other student attending the IHE. CCP courses are **not meant** to be aligned or compared to courses students receive as part of their high school experience. High school courses are just that, high school courses.

Students participating in CCP can do so only at an IHE where programs have been approved by the Chancellor. These institutions are conferring college credit through successful completion of the courses they offer. Institutions risk state, regional, and national accreditation if they confer credit that does not meet postsecondary standards. To establish a process whereby college courses are being compared to high school courses as a condition of conferring high school credit for the college course taken is contrary to the notion of the student engaging in an authentic postsecondary experience. **The high school cannot be in a position to drive the content of postsecondary coursework.**

Cost Concerns

Issue:

Eliminate the “floor” for schools districts where school district faculty is conducting the CCP course on the school district campus and instead allow flexibility at the local level for financial agreements between school districts and IHEs.

The concept of the “floor” is a very important component for ensuring financial sustainability and academic quality for CPP. CCP law and regulations require IHEs to perform classroom observations and provide professional development opportunities for high school teachers who work as adjuncts and teach CCP courses at a high school. These activities are required to ensure that the courses taught at the high school are truly representative of the institution’s campus course and that adjunct instructors are teaching the course consistent with the standards of professionalism and quality expected by the institution. There is a cost associated with these activities which must be covered by the college. When developing the financial structure of CCP, input was taken from IHEs as to the minimum cost it would take to sustain the activities required by the program. In recommending the floor amount, institutions also confirmed the absolute necessity of having a funding source to cover the additional responsibilities required by the program in order to avoid taking those costs from other areas of the institution.

Issue:

Establish a level of financial responsibility for parents....in order to create accountability for the student and family rather than CCP being an entitlement regardless of student’s performance or outcome in the college course.

One of the more significant barriers to student participation in the previous program was costs. There were no parameters on how much an institution could charge for students to participate in the program. In establishing recommendations for the CCP program, ODHE viewed as part of its mission, the establishment of program that required minimal, if any, costs to students and parents which we believe CCP accomplishes. If the underlying policy consideration of establishing a minimal-cost program changes, then ODHE would want to be part of the process of vetting any proposed solutions.

With respect to accountability for students in the CCP program. If a student in CCP fails or withdraws from a CCP course after the specified withdrawal period, they are subject to the secondary school seeking reimbursement to recover the costs of their participation. There are no parallel circumstances under which a secondary student failing a course at the secondary school is subject to potential financial penalty. Failing or withdrawing from a CCP course could also have significant and permanent negative effect on a student's academic record at both the high school and postsecondary level.

Textbooks

Issue:

There needs to be a statewide textbook policy that reduces the burden for school districts if they are to be the sole provider of textbooks for CCP courses.

This is an issue that is being closely monitored by ODHE and ODE. We agree that there is much room for improvement with respect to the purchase and processing of textbooks for CCP students. We are working with both secondary and postsecondary institutions to share best practices regarding standard agreements processes and procedures that appear to be working well for all parties. We are encouraging early and open dialogue between parties about how the textbook process will proceed going forward. The issue is potentially complicated by the fact that not all IHEs have control of the textbook purchasing process. In some cases independent contractors with their own policies and procedures are in charge of textbook purchasing. Because of this fact, a uniform standard may be difficult to apply and enforce. We are committed however to continuing to work with secondary and postsecondary institutions and the CCP Advisory Council to find ways to make this process more efficient.

Miscellaneous

Issue:

A commission or Taskforce needs to be established that includes all stakeholders for the decision making and rule setting for CCP.

Response

The development of rules and regulations for CCP has always been and will continue to be an open process. The Chancellor and Superintendent of Public Instruction have sought and received input from a wide variety of secondary and postsecondary constituents in developing rules and regulations for the CCP program. Proposed language in House Bill 474 requiring the development of additional rules contain provisions requiring the input of stakeholders in this process. In addition, as previously

mentioned, current CCP statute requires the formation of an advisory council which will contain education practitioners from secondary and postsecondary institutions.

Issue:

Increase the availability of high school teachers qualified to be adjunct instructors permitted to teach CCP courses. School districts currently do not have any authority for the approval of qualified instructors and there is no state wide consistency in who is selected to teach.

Response

The state has dedicated substantial resources in support of high school teachers gaining the necessary credentials to teach coursework at the college level. We anticipate that recent funding appropriated for this purpose will result in a significant increase in the available pool of teachers across multiple subjects areas qualified to serve as adjuncts. Ultimately however, the decision to hire the appropriate person to teach an IHE's course must remain at the IHE. As previously mentioned, the CCP course taught at the high school must be the same course taught at the campus. IHEs are charged under CCP to observe those courses and ensure that they meet the educational and professional expectations of the institution. The instructor in the classroom must be someone the institution is comfortable with teaching that course and representing the institution for that purpose. The IHE should be **the sole responsible entity** evaluating the fitness and qualification of the individual teaching their course.

Chairman Duffey, and members of the committee, this concludes my testimony. I would be happy to respond to any questions you may have.