



Senate Finance Subcommittee on Higher Education: Public Testimony House Bill 49

May 25, 2017

Chair Gardner, Vice Chair Williams and members of the Senate Finance Subcommittee on Higher Education, my name is Michele Brown and I have the honor of serving as the President-elect of the Ohio Alliance of Dual Enrollment Partnerships (OADEP). My colleague Robert Callahan who is serving as OADEP's Government Relations Chair joins me today for this testimony.

We would first like to thank the subcommittee members for including OADEP in this very important conversation and to provide a brief description of our organization. OADEP began in 2009 as a grass root cadre of dual enrollment practitioners and advocates from across Ohio meeting to discuss best practices, opportunities and challenges. OADEP is proud to be the first state chapter of the National Alliance of Concurrent Enrollment Partnerships (NACEP).

Our membership currently includes over 100 professionals who represent a diverse set of organizations including both public and private school districts, college and universities and community organizations. The purpose of OADEP is to link Ohio college-school dual enrollment partnerships and to support and promote such partnerships through advocacy of quality initiatives, program development, professional development, communication and promotion of national standards.

OADEP actively engages in the following activities:

- Disseminate best standards for high quality dual enrollment programs
- Provide professional development to all interested parties concerning quality dual enrollment programs, including discussions for best practices and challenges
- Advocate for programs that enable interested teachers to obtain dual enrollment credentialing
- Serve as a state advocate for dual enrollment partnerships
- Foster strong partnerships between post-secondary and secondary institutions

On behalf of our organizations membership, we would like to take this opportunity to address the potential impacts, both positive and negative of the policy proposals related to the College Credit Plus program in House Bill 49.

Refining the Intent to Participate Appeals Process

OADEP continues to support the requirement that students submit an intent to participate notice to their secondary school leadership on an annual basis. This requirement ensures that some level of communication and coordination is taking place between the students, the students' family and school district officials prior to participation in the College Credit Plus program.

Additionally, we support policy that appropriates decision-making discretion at the local (IHE and Secondary School) level. Empowering school district leaders with the discretion to field appeals and make decisions based on knowledge of specific circumstances and internal / external forces that may have affected a student's ability to meet the April 1st deadline.

However, questions remain as to where home-educated students would send an appeal as the proposal does not specifically address this group of students. Additionally, some stakeholders have expressed concern that the removal of a neutral party, in this case the Ohio Department of Education, may not provide an equitable opportunity for appeal.

So long as school districts make decisions in an equitable manner, the OADEP membership supports the proposal to move the appeals process from the Superintendent of Public Instruction's Office (ODE) to the governing board or superintendent of the student's school district.

Assessing a Students Eligibility

OADEP believes that secondary school students should demonstrate the appropriate level of academic preparedness relative to the type of coursework that they intend to take prior to being granted admission to an IHE's College Credit Plus program. Our membership appreciates that this policy attempts to prevent those students who are not college ready based on the Statewide Uniform Remediation-Free Standards from participating. However, in some cases, such as coursework that is technical in nature, meeting remediation free standards is not always directly correlated to academic success in those types of courses.

It's important to note that the remediation-free standards were established by the public college and university presidents and serve as a clear target for college readiness. We have concerns regarding the proposed language that would allow students to be admitted who score within "one standard error of measurement" as that measurement is not well defined and seems to fall short of the intent of the policy.

We recognize the individual uniqueness of each IHE that participates in the College Credit Plus program and strongly believe that each institution best understands the characteristics of a person that most lend to academic success in their programs. Participating institutions should have the authority to set admission policy locally that aligns best with the types of programs and courses they offer. While at the same time, it will be imperative to ensure that those policies are designed for student success and not solely enrollment.

Enrollment Communication Distribution

The OADEP membership supports the proposal to remove the requirement to include the Superintendent of Public Instruction on notices to participants and school districts regarding admission and course enrollment information. The Ohio Department of Education has alternative methods for accessing this data via other required reports that every participating IHE submits on a per-term and annual basis. This proposal would cut down on unnecessary paperwork and administrative resources.

Course Eligibility

The intent of dual enrollment programs are to provide a means for secondary school students to earn college credit and satisfy high school graduation requirements concurrently. Language that currently exists in the Ohio Revised Code allows College Credit Plus participants to enroll in any course in an IHE's catalog so long as the student meets both the IHE's admission policy and course prerequisites. The exploratory nature of the rule provides students with an opportunity to experience a diverse set of academic disciplines, course modalities and career tracks. However, the OADEP membership recognizes and appreciates that this program is subsidized by the Ohio taxpayers and believes that the program must be administered in a fiscally efficient and responsible manner.

The OADEP membership supports a restriction of course options in the following scenarios:

- The course fees would create unnecessary financial hardship on an IHE.
- The course would be unnecessarily duplicative.

In all cases, students should be advised by the IHE on how a college course would apply to a degree or other academic pathways and by the school district if the course would satisfy a high school graduation requirement. The OADEP membership would not support a policy that would restrict students to only courses within the Ohio Transfer Module (OTM) or Transfer Assurance Guides (TAGs) systems. Additionally, if this proposal is passed as is, significant input from both secondary schools and IHE's should be collected by ODE and ODHE prior to any final language is introduced as rule.

Textbook Agreements

Textbooks costs continue to create a financial hardship on secondary schools, some of which are spending well over \$100,000 dollars per year on course materials for their participating students. Additionally, secondary schools have very little control over the cost of textbooks. That control lies mostly with the textbook publishers and college faculty who in most cases operate under academic freedom and have discretion over textbook decisions.

The OADEP membership appreciates that this policy proposal attempts to create a cost-sharing model but does not support the specific language at this time. IHE's are already charging a reduced per credit hour rate for tuition and waiving course fees and are not prepared to assume the additional financial burden of providing all required course materials, which in this proposal now also includes home-instructed students.

OADEP recommends that ODE and ODHE create a statewide taskforce to study and make recommendations on ways in which savings on required course materials could be obtained. Many IHE's are already engaged in this work and could provide valuable resources in helping to shape those recommendations.

Underperforming Students

The OADEP membership supports the proposal to create continuation, dismissal and return polices for underperforming College Credit Plus students that differ from the ones already in place for regular students. Any students who enrolls in college coursework assumes certain risks. The greatest risk to College Credit Plus participants, and the one that the OADEP membership has the most concern with, is the downstream impact that negative academic performance can have on a student's future academic goals and career. The OADEP membership believes that significant input from both secondary schools and IHE's should be collected by ODE and ODHE before any final policy language is introduced as rule.

Biennial and Annual Reporting Requirements

The infancy of the College Credit Program warrants the need for sound research based data to inform best practices and future policy proposals. The proposal in this bill to require the Ohio Department of Higher Education to produce additional biennial and annual reports on the status of the program and student achievement metrics, which include quality assurance measures related to the program, is welcomed by the OADEP membership.

IHE's Obligation to Pay for Entrance Assessments

The OADEP membership is opposed to any policy that would require an IHE to pay for a student's assessment exam for the purposes of admission, or one that would pressure an IHE to administer an alternative exam that's purpose is for course placement, not admission, in order to save costs.

In accordance with the College Credit Plus legislation, IHE's are required to apply the same admission policy to College Credit Plus applicants as they do to regular degree seeking undergraduate applicants. Guidance provided to IHE's for developing admission policy for CCP participants is found in both in the Ohio Revised Code and Ohio Administrative Code (ORC 3365.03, ORC 3365.05 and OAC 3333-1-65.3).

For institutions operating on a selective admission policy, there is a distinct difference between admission and placement; for the most part, admission policies supersede placement. It is important to remember that on many campuses, the Accuplacer

exam is not cataloged as an acceptable assessment for either purpose. On many campuses throughout the State, ACT or SAT scores are used for both admission and placement. Additionally, the purpose of the remediation free standards set by the college and university presidents in 2012 was for placement, not admission to an institution.

The remediation free standards (<https://www.ohiohighered.org/college-readiness>) explicitly state that, "The Chancellor holds no authority over which college entrance examination is accepted at each institution." Based on this language, we feel that every IHE has the authority to determine which assessment exam(s) it wishes to accept for the purposes of both admission and placement.

Beginning this year, all public secondary school students in the State of Ohio have the opportunity to sit for an ACT assessment during eleventh grade, and the costs are covered by their school district. Additionally, any 11th or 12th grade secondary school student who is deemed economically disadvantaged can receive a fee waiver that allows them to register for the ACT or SAT at no cost. These two options provide for at least some opportunity for participation in the case the student wishes to participate but not have either the financial means or the desire to pay for the exam registration fees.

Additionally, if this proposal were passed and implemented several questions and logistical hurdles would exist:

- This would expose institutions to additional significant costs. IHE's receive hundreds, sometimes thousands, of College Credit Plus applications from 7th through 11th grade students a year. The registration fees for the ACT and SAT are \$39.50 and \$45.00 respectively.
- There is no guarantee that a student would apply to the institution that paid for their assessment. A student may take their "free" exam and use the score to apply to any other institution as either a CCP or regular student applicant. This practice would increase an institutions cost exposure unacceptably.
- Detailed questions about new rules remain. For example, if a student does not earn an appropriate composite score or the required sub-scores for remediation free purposes, could the student simply have another IHE pay for another exam by submitting an additional application to that institution? If so, would there be a limit on the number of institutions that a student could apply to and receive a "free" assessment?
- There is not currently a mechanism in place for an IHE to waive or pay for a prospective applicants ACT or SAT registration fee. Institutions would need to rely on cooperation from the ACT or SAT organizations in order to make this possible, and neither testing agency has indicated that they will provide such a mechanism.
- At many institutions, admission policy is part of academic policy, informed by faculty governance, and any change to allow for an alternative assessment for the purposes of admission would need to be approved by the faculty.

The OADEP membership feels strongly that this proposal goes beyond the scope and intent of the CC+ program, directly poses a conflict with current CCP legislation, and introduces additional costs and logistical barriers that only further perpetuate unsustainable environments for dual enrollment programs to exist.

Requiring a C Grade or Higher in Order to Earn College and High School Credit

The OADEP membership is unclear what problem this proposal attempts to resolve and for the following reasons, we feel strongly that it be removed from the bill.

- As the sole accrediting body for concurrent / dual enrollment partnerships, the National Alliance of Concurrent Enrollment Partnerships (NACEP) helps to ensure that dual enrollment programs adhere to the highest standards so students experience a seamless transition to college. NACEP accreditation standards encourage institutions of higher education to transcribe dual enrollment credit in the same fashion as all other college credit earned by regular students. Institutions may not be able to seek NACEP accreditation if they have implemented academic policies that do not treat dual enrollment students equitably. Institutions that are already accredited may be at risk of losing their accreditation if they are required to implement this or other similar policies.
- The Ohio Transfer and Articulation Policy states that, "Ohio public institutions of higher education are to accept and apply all transfer coursework with a letter grade of D or higher as the institution would for a native student under

the business rules and academic policies of the receiving institution.” If a student had participated in the College Credit Plus program while in secondary school and completed a course at an IHE earning a D, based on current transfer policy the expectation would be that any future receiving IHE would be required to accept and apply the course. However, the lack of credit earned in this particular case would prevent the student from transferring the course. Thus, this policy proposal is in direct conflict with transfer policies informed by the Ohio Revised Code and established in States mandated transfer policy.

- Secondary school seniors who earn a grade below a C in a course needed to satisfy a high school graduation requirement may not be able to graduate. In addition, this proposal would create inequity with other advanced standing options (IB and AP) where high school credit is awarded for grades of D- and higher.

Chair Gardner, Vice Chair Williams and members of the Senate Finance Subcommittee on Higher Education, the Ohio Alliance of Dual Enrollment Partnerships (OADEP) is grateful for the opportunity to engage in this conversation and to offer perspectives on behalf of our membership that we hope are valuable to you as these conversations continue. We would welcome any questions you may have at this time.

Sincerely,

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President-Elect

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