

OHIO AUDITOR OF STATE
KEITH FABER



Performance Audit

of

Ohio's College Credit Plus Program

August 2022

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Dear Fellow Ohioans:

As Ohio students head back to school soon, many families are thinking about ways to stretch their dollars during tough economic times. Thankfully, Ohio has a great program for families and students to save on future higher education costs. As your State Auditor and a dad of high school students, too - I want to be sure that every Ohio student and family is aware of this program and is prepared to take full advantage of it. My Ohio Performance Team took a deep dive into Ohio's College Credit Plus program and found that when used early and often, Ohio families can save thousands of dollars on higher education costs by taking classes that count for high school and college at the same time.

Ohio's College Credit Plus is a dual enrollment program that allows Ohio students in grades 7 through 12 to earn high school and college credit simultaneously. Established in 2015, College Credit Plus has the goal of increasing the number of high school students completing college coursework, while also reducing their tuition costs as they pursue a college degree at an Ohio college or university. Most importantly, this opportunity comes with no or only minimal cost to the student and family and is almost fully funded by the State, high school and higher education partner.

Since its inception, College Credit Plus has steadily grown and now boasts enrollment in excess of 76,000 students. In fact, 2020 high school graduates who took advantage of College Credit Plus courses entered college with an average of 14 college credits or nearly 5 college courses. Again, all at no to little cost to the student or family. Additionally, as of 2021, nearly 8,000 associate degrees and certificates have been awarded to high school students who really ramped up their College Credit Plus dual enrollment. Our audit also found that students participating in dual enrollment were more likely to graduate from high school and pursue college or university degrees or other post-secondary certificates. While these facts and figures are encouraging, we can do better! Ohio students and families need to take advantage of this program, while high schools and higher education partners must do more to hype up College Credit Plus.

Despite the enormous advantages of the program, a wide disparity exists among school districts in how well this program is embraced. One easy path to improved participation would be for the Ohio Department of Higher Education and Ohio Department of Education to work on a joint marketing campaign and provide standardized forms that could be used by every student participating in the program. Also, the Ohio Department of Higher Education and Ohio Department of Education need to refine and tailor a program to encourage participation amongst low performing districts.

Our audit also found economically disadvantaged and minority students participated in the program at lower rates than their peers. For these groups, studies have shown that participation in dual enrollment programs can be particularly impactful. Students in low-income and minority groups have been shown to enroll in college at higher rates after participating in dual enrollment programs, they also tend to have better outcomes while in college – such as: higher retention rates, higher GPA, and higher graduation rates. Certainly the State and education providers can build off these outcomes and do more to ensure that every Ohio student and family has real and meaningful access to this program.

Our examination of Ohio's College Credit Plus program has found that when school districts promote these classes and families take the time to learn more and participate, the program helps our students save time and money in their pursuit of a college degree. Some of these savings are apparent as fewer required credit hours for a degree means less out of pocket costs for Ohio families. However, some of these savings are also achieved through the reduced housing and book costs that accompany fewer semesters on a college or university campus. Additionally, students can offset tuition costs through internships or co-op programs earlier in their collegiate careers. These types of programs allow students to work, and earn an income, while accumulating college credits and gaining valuable work experience. These programs also help to provide existing and emerging industries in Ohio with a workforce that is ready to contribute on day one.

Helping our kids achieve their goals is something every parent strives to accomplish. College Credit Plus is an existing program that can provide an opportunity for more Ohioans to achieve their goal of earning a degree. We need to be better in helping Ohio's students and families find the assistance they need in their pursuit of a college education.

Sincerely,

A handwritten signature in black ink that reads "Keith Faber". The signature is written in a cursive, flowing style.

Keith Faber
Auditor of State
Columbus, Ohio

August 16, 2022

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College Credit Plus Program

Performance Audit Summary

WHAT WE LOOKED AT

In Ohio, students in seventh through twelfth grade can enroll in college courses at little to no cost to their families through College Credit Plus (CCP), a dual enrollment program that allows eligible students to earn college and high school credits simultaneously by taking courses from Ohio colleges or universities. The program is coordinated by the Ohio Department of Education (ODE) and the Ohio Department of Higher Education (ODHE). While the program is jointly managed, each department assumes different roles and responsibilities. ODHE takes the lead in adopting rules that govern the program and communication, while ODE takes the lead in data verification and directing funding for program fees from the districts to colleges and universities. The purpose of the program is to enhance a student's post-secondary success while improving the career readiness of those graduating from high school in Ohio. As an additional benefit, students and families have the opportunity to save money on tuition costs by completing certain course credits during high school.

Prior to 2015, when the CCP program was created through legislation and became effective, districts could participate in a voluntary dual-enrollment program known as the Post-Secondary Enrollment Option. One key difference between the two programs is that districts are required to offer students the opportunity to participate in CCP and to provide information sessions so that students and their families are informed of their options.

Students were first able to participate in the program during the 2015-2016 academic year (AY 2016), and the program just completed its seventh year. In AY 2021, more than 76,000 students took advantage of the program earning more than 650,000 credit hours.

We reviewed the program's governance, participation, and outcomes along with funding and cost implications related to the program. The purpose of the audit was to determine the impact that the program has on Ohio students and their families while also identifying ways program participation could be improved.



Online Data Dashboard

In addition to the information contained in the report, data dashboards were created to provide detailed data on CCP usage at the district level. These dashboards provide insights using a variety of metrics including demographic and geographic data. Click here for the [Website](#).

WHAT WE FOUND

Ohio began offering dual enrollment in 1989 through the Post-Secondary Enrollment Option Program (PSEOP). This program, which existed for approximately 25 years, had several barriers to participation. For example, districts had the ability to discourage its use, such as by limiting a student’s ability to participate in extra-curricular activities or requiring high school students to take multiple college courses to obtain high school credit for an individual class.

CCP was established in 2015 as a replacement for PSEOP and was designed to alleviate many of the participation barriers identified in PSEOP.¹ CCP participation has dramatically increased dual enrollment participation relative to PSEOP. In AY 2015, PSEOP’s final year, the total number of credit hours taken was approximately 190,000. CCP had more than 650,000 credit hours taken in AY 2021, or an increase of approximately 240 percent.

In the first five years of CCP, program participation increased by approximately 50 percent, from 54,053 participants in AY 2016 to 76,601 participants in AY 2021. Based on available data, students who participated in CCP had, on average, 14 college credits completed when graduating from high school in 2020. This is the equivalent of almost five college courses completed, or approximately one semester’s worth of college, prior to enrolling as a traditional college student. These credits can expedite the amount of time it takes to graduate from a college program and provide students with more flexibility when determining their educational goals. In AY 2020, the amount of credits attempted represented a potential cost savings totaling more than \$155 million for Ohio families.

CCP offers four different methods of instruction, and only one requires attendance on the college campus so students have flexibility in how they choose to participate in college

¹ CCP was first operational in AY 2016 as HB 487 of the 130th GA (effective 9/2014) replaced PSEO with CCP. Uncodified language set forth the transition in which PSEO continued for AY 2015 and CCP started operation in AY 2016.

courses and are not required to be on campus. The most utilized option for instructional delivery for CCP students is at the high school using credentialed district employees. In addition to traditional on-campus enrollment, students may also attend courses exclusively online or a college may have an instructor or professor go to the high school to teach a course.

Colleges and universities receive payment for the courses taken by CCP participants in two ways. The first is through a transfer of district state foundation funding from ODE. This transfer is based on the specific educational delivery method utilized by participants and either the corresponding default rate established in legislation or the negotiated rate between a district and a college or university. When a student at a district enrolls in a CCP course, a portion of the foundation funding for that student is transferred to the college or university. This payment is akin to a regular tuition payment, although the cost per credit hour is lower than that of a traditional student. In addition to these transfers, public colleges and universities receive funding from the state known as the State Share of Instruction (SSI) for the education of Ohioans including CCP students that complete courses through the program.

While the program successfully provides many students with advanced educational opportunities, there is room for improvement in key areas. We identified multiple recommendations in the areas of program operations and participation which will enhance the success of the program.

KEY OBSERVATIONS

Key Observation 1: Nationwide, dual enrollment programs have been proven to have a far-reaching impact on participating students. Students who participate in dual enrollment programs are more likely to graduate from high school, go to college, and complete a degree. While the CCP program is relatively new, these trends are identifiable in existing data. For students that graduated from Ohio high schools in 2016, the college enrollment rate was 46 percent higher amongst CCP participants than the statewide average. Further, once these students enrolled in college, the retention rate from year one to year two for CCP students was 48 percent higher than the statewide average.

Key Observation 2: As of 2021, nearly 8,000 associate degrees and certificates had been awarded to CCP students while they were still in high school. Further, for those that enrolled in postsecondary programs, we found that CCP students earned bachelor's and associate degrees while earning a similar number of total credits to their peers that did not participate in CCP. This means that the program is helping them to save money in college because these students are taking fewer courses than peers while enrolled exclusively in

college. The average CCP student saves approximately \$4,400 in tuition, fee, and textbook costs.

Key Observation 3: Nationally, participation in dual enrollment programs has been shown to close equity gaps for economically disadvantaged and minority students. However, the impact of this opportunity has been limited due to lower rates of participation of economically disadvantaged and minority students. For Ohio’s dual enrollment program, College Credit Plus we identified several factors that likely contribute to this lagging participation rate that are likely to be barriers for some students in these populations.

Key Observation 4: While CCP has achieved the initial program goals of improving overall participation rates and minimizing barriers for students, there are no formal goals and objectives to guide the future of the program. In particular, the data collected by ODHE and ODE on program participation is largely used to report out historical performance. This information, if used strategically, could be the basis of a forward-facing plan designed to increase access to the program in underserved populations, expand participation to save families additional tuition costs, and proactively respond to the evolving needs of Ohio’s future workforce and economy.

PROGRAM PARTICIPATION

With the exception of AY 2021, which was impacted by the COVID-19 pandemic, the CCP program has seen growth in participation in each year of existence. This growth has occurred both in the number of individuals participating and in the number of credits which are attempted and earned. Ohio has one of the highest rates of dual enrollment in the country. However, the market for talent is increasingly competitive for job seekers, businesses, and governments seeking to encourage economic growth. Ohio benefits from a well-educated workforce and identifying ways to increase participation in CCP can help give graduating seniors a competitive edge.

Our review of program participation and outcomes identified some key areas that will assist overall participation and enhance program experience for Ohio’s students and families. We further identified areas where changes could be made to encourage low-income and minority students to participate at a greater rate.

Recommendation 1: Providing information and promoting CCP to families encourages and increases program participation. Traditional school districts are required by law to begin providing information regarding CCP to students and families beginning in 6th grade. However, several districts self-reported that they failed to comply with this requirement and there is wide variation as to when information is first provided to families. ODE is broadly responsible for administering the educational policies of the state including the

administrative responsibilities of school officials and personnel and should work to ensure compliance with requirements specific to CCP. ODE and ODHE should take a larger role in the marketing, communication, and compliance of the program. As a part of this, the Departments should consider, using rule writing authority if necessary, developing standard communication forms that Districts would be required to use to eliminate confusion regarding the use of state funding for the program. Ensuring consistent communication and marketing of the CCP program and offering clear CCP enrollment forms will help to increase program participation. Also see **Recommendation 7**.

Recommendation 2: College courses can be taken through CCP on a college or university campus, in a high school setting, or online. Currently, the CCP delivery methods that are the most easily accessible to students are those models which are held at a high school campus. In order to improve overall CCP participation rates, school districts should work to increase the number of classes available in the high school setting. This will require decisions to be made at the local district level based on the needs of the community. In some instances, it may require the credentialing of additional high school teachers, sharing credentialed teachers among school districts, or leveraging county Educational Service Centers to provide CCP instruction. In others, it may require strong partnerships with colleges or universities to provide professors on the high school campus. By expanding access to CCP courses at the high school, students will be able to more easily participate in the program.

Recommendation 3: The General Assembly has allocated a total of \$8 million in grant funding for the purpose of increasing the number of CCP credentialed high school teachers which was jointly administered by ODE and ODHE. The most recent grants were awarded in FY 2020 and provided funding through FY 2023. Entities were awarded funds to be used towards graduate coursework necessary to credential teachers to instruct CCP courses. Grantees received funding through a reimbursement of expenses once claims were verified by ODE. However, the law did not grant ODE the authority to require that individuals complete the credentialing process. This means that grant funding may not be maximized as individuals may ultimately choose to not seek out credentialing. If future grants are awarded, ODE and ODHE should work with the General Assembly to require the attainment of CCP instructor credentials as a condition of the award, along with a required service period. Doing so would help to ensure that the grant funds are fully maximized for their intended purpose of increasing the number of CCP credentialed teachers. In turn, this could result in increased program participation.

Recommendation 4: Traditionally underserved students, particularly those that are low-income or minority, participate in the CCP program at a lower rate than their peers. The

reduced rate of participation is due, in part, to barriers that these populations face that impact the ability to attend courses online or on campus. To improve program participation, ODE and ODHE should work to minimize barriers to participation such as limited access to support services and high speed internet for these students. In doing so, the Departments can improve CCP participation rates for traditionally underserved students, allowing more families to take advantage of program benefits, including exposure to advanced educational opportunities and cost savings associated with pursuing post-secondary education. As additional data is collected and incorporated into long-term strategic goals, ODHE and ODE can work with colleges and universities and districts to design and expand targeted initiatives to further address barriers and develop a plan to increase participation.

Recommendation 5: For those students who choose to attend CCP courses at a college or university, there is little to no program specific orientation available to them. While colleges and universities have orientation programs for traditional students, new CCP students may not benefit from those to the same degree as orientations specifically tailored to them. ODE and ODHE should work with colleges and universities to ensure there is a robust and uniform orientation program for CCP participants. These orientation programs should be designed in a way that the comfort level of CPP participants is increased as they navigate college course and so that they are prepared for the rigor and expectations of college courses.

PROGRAM OPERATIONS

The CCP program functions as a collaborative effort with ODHE and ODE providing funding and general oversight and high schools, colleges, and universities responsible for the education of students. While there is no direct funding support for the operations of this program, the staff working on this program are funded through general appropriation to the Departments; ODHE employs two full-time positions dedicated to implementation and oversight functions. To the extent that public funding is applied to the program, it is in the transfer of school foundation funding from districts to colleges and universities for those students participating in CCP and the inclusion of CCP students in the calculation of the State Share of Instruction (SSI), which is distributed to public colleges and universities through ODHE.

Our review of the program's governance, funding, and cost implications led to multiple recommendations that would improve overall programmatic operations. In particular, our recommendations are focused on the strategic utilization of data and improved oversight in order to develop goals and objectives for the program.

Recommendation 6: The CCP program does not have distinct, progressive, measurable program goals supported by routine data analysis and evaluation. While ODHE and ODE both collect significant amounts of data related to the CCP program and student participation, this information is focused on outputs, such as the number of courses taken in a year, and not outcomes, such as reduction in time spent pursuing a degree or certificate program. As appropriate program oversight is established and data collection is enhanced to include outcome data, formal goals and metrics should be developed to ensure desired programmatic outcomes are being achieved and to identify areas for improvement.

Recommendation 7: The laws governing CCP establish specific duties for ODHE and ODE related to the distribution of funds and data collection and reporting. They further require the establishment of an advisory committee to assist in the development of performance metrics and monitoring of the program’s progress. However, the laws do not identify who is responsible for overall program oversight. ODHE, ODE, and the CCP advisory committee should work with the General Assembly to clarify and strengthen the management, oversight, and compliance monitoring functions necessary to allow CCP to reach its potential. In doing so, they should consider what structures and resources will be necessary to continue to monitor and improve the program in order to provide strategic direction that will support the evolving needs of Ohio’s students, economy, and workforce.

Recommendation 8: There is a significant amount of data collected by both ODHE and ODE regarding the CCP program, and the content and quality of this data exceeds that of most peer state dual enrollment programs. This data is largely related to program participation while students are in high school and is used to comply with annual reporting requirements that provide historic detail on the outputs of the program. While the data collection practices used by ODHE and ODE are generally good in comparison to peer states, there is room for improvement. In some cases, there are data fields that are incomplete, particularly as it relates to demographic information, and data that is inconsistent in nature, such as identifying the type of courses being taken. This type of information is critical in identifying where program improvements could be made. Both ODHE and ODE should work to ensure that the CCP data collected is both complete and consistent. This information can then be leveraged to identify and work towards strategic programmatic goals.

Recommendation 9: When a student takes college courses through the CCP program, ODE directs payment to the college or university based on a default rate that is specified in ORC. The default rate varies based on the delivery model and contains both a maximum and minimum charge. The current formula that establishes the default rate uses a set dollar amount identified in ORC as a baseline and has not been significantly updated since the program first began. The General Assembly should review the default payment rates to ensure that they appropriately reflect the current cost to IHE’s to provide CCP courses to

high school students. In doing so, the General Assembly should consider how future changes to the foundation funding model might impact the program's default fee rates.

Recommendation 10: In addition to CCP participation fees, school districts are also required by law to cover the costs of textbooks, which can be costly. One way to reduce the impact of purchasing textbooks is through the use of open educational resources (OER), which are freely accessible, openly licensed text, media and digital assets including college textbooks, online supplements, etc. While efforts have been made to expand opportunities for the use of open educational resources in the state, their current utilization appears to be limited. The General Assembly should require ODE and ODHE promote opportunities to increase the use of OER materials among CCP participants and could consider splitting the cost of educational materials between colleges and universities and high schools. A strategic effort should be made to align existing and available OER materials with CCP courses offered among the State's various colleges and universities. Collaborative efforts should be aimed toward gaining wider acceptance and adoption of OER materials among Ohio's colleges and universities. Increased adoption of OER textbooks would reduce costs to school districts, which could, in turn, encourage further participation in the program.

Issue for Further Study: Public colleges and universities receive funding from the state through the State Share of Instruction (SSI) to subsidize the cost to educate Ohio residents. This funding is based on a complex formula that takes into account student enrollment and academic outcomes and is based on detailed cost information reported by institutions to ODHE within the Higher Education Information (HEI) system. The formula does not differentiate CCP students based on course delivery model. This means that a CCP student using the high school instruction delivery method would generate the same SSI value as an on-campus CCP student. As a result, the SSI funding received for the education of CCP students may be outsized relative to the actual costs of that education. ODE and ODHE should work with the General Assembly to re-evaluate how to best set and deliver SSI payments to ensure the payments align with the costs incurred by colleges and universities to deliver CCP services.

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Table of Contents

Introduction.....	1
College Credit Plus	2
Stakeholder Roles and Responsibilities	3
Delivery Models.....	4
Program Funding	6
Participant Results	9
Audit Overview.....	11
Audit Methodology.....	11
Summary of Results.....	12
Noteworthy Accomplishment.....	16
Program Participation	17
Background.....	17
What We Looked At.....	18
Why We Looked At This.....	18
What We Found	19
Recommendation 1: Ensure that all School Districts Comply with Program Requirements ...	23
Recommendation 2: Increase Access to CCP Courses at High Schools	29
Recommendation 3: Implement Additional Grant Requirements	33
Recommendation 4: Minimize Barriers to Participation Among Underserved Student Populations.....	36
Recommendation 5: Ensure there is a Robust and Uniform Orientation Process for CCP Students.....	43
Program Operations	47
Background.....	47
What We Looked At.....	47
Why We Looked At This.....	48
What We Found	48
Recommendation 6: Implement Formal Goals, Objectives and Strategies for College Credit Plus.....	51
Recommendation 7: Clarify and Enhance the Level of Program Oversight Responsibilities ..	54
Recommendation 8: Improve Data Collection and Utilization.....	57

Recommendation 9: Update Default Rate Based on True Cost of CCP Delivery 62
Recommendation 10: Leverage Open Educational Resources 66
Issue for Further Study: Review SSI Funding in Relation to CCP Participation 69
Note on Colleges and Universities with Respect to CCP 72
Client Response Letter 78
Appendix A: Purpose, Methodology, Scope, and Objectives of the Audit 83
Appendix B: Program Participation 98
Appendix C: Program Operations 120

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Introduction

Preparing students to be active and productive members of society is a fundamental goal of primary and secondary education. However, the job market is rapidly changing and the jobs of today and tomorrow require education and training that goes beyond the traditional primary and secondary curriculum. According to a study from the Georgetown University Center on Education and the Workforce, approximately 80 percent of well-paying jobs require education beyond a high school diploma.² At the same time, based on national data, fewer than 20 percent of students entering 9th grade are expected to earn a college degree by the age of 24. In order to remain competitive in a global market, we must provide additional support to students in high school to encourage participation in advanced educational opportunities and to minimize the financial burden associated with such educational endeavors.

Dual enrollment, or simultaneously taking high school and college credit courses, is designed to allow students the opportunity to earn college credit while still enrolled in high school or middle school. These programs are generally implemented at the state-level and their structure can vary in relation to oversight, funding models, organizational structure, student eligibility, and credit transferability. The U.S. Department of Education has identified the benefit of dual enrollment programs dating back to the early 1990s noting that the average time to degree was reduced by a half a calendar year for students with college credits earned in high school.

Courses taken through dual enrollment programs can be on a college campus, online, or at a student’s high school. Nationwide, nearly 90 percent of high schools offer dual enrollment coursework and 80 percent of participating students took courses at their high school. Ohio’s current dual enrollment program, College Credit Plus (CCP) was established in 2015 and is primarily governed by the provisions found in Ohio Revised Code (ORC) Chapter 3365. The program offers all academically eligible students in grades 7 through 12 the opportunity to enroll in college courses. CCP is jointly managed by both the Ohio Department of Education (ODE) and the Ohio Department of Higher Education (ODHE).

The Ohio Auditor of State, through its Ohio Performance Team (OPT), is required by ORC § 117.46 to complete at least four performance audits of state agencies¹ (two of the audits must be of state agencies selected from a list comprised of the administrative departments listed in ORC § 121.02 and two of the audits must be of other state agencies) or, at its discretion, institutions of higher education during each biennium. In 2021, OPT initiated a performance audit³ of CCP. This audit serves to provide transparent insight into the effectiveness of the program and to provide recommendations that will help to continue the growth of the program.

² <https://cew.georgetown.edu/cew-reports/3pathways/>

³ Performance audits are conducted according to Generally Accepted Government Auditing Standards. See [Appendix A](#) for additional details.

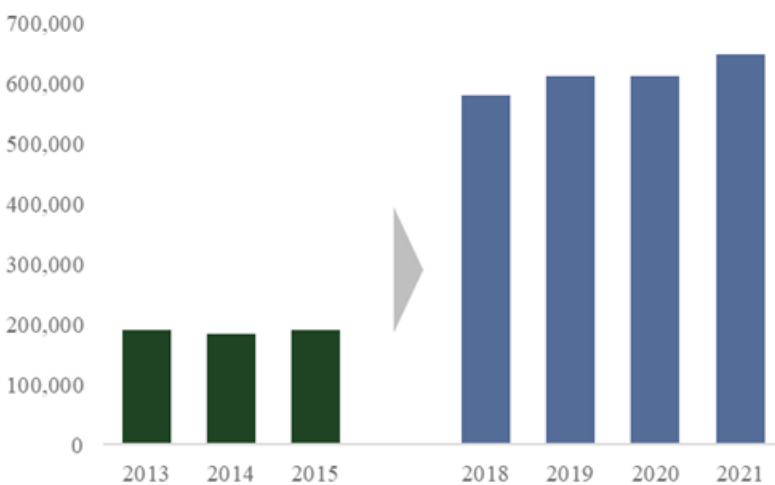
College Credit Plus

Dual enrollment programs are an effective way to invest in a state’s economic future. Studies show students who have taken dual enrollment courses increase the workforce quality, especially in economically depressed regions, as dual enrolled students are more likely to pursue post-secondary education. Dual enrollment allows students to have access to more rigorous course work at an earlier stage in their education pathway, which prepares students to better understand the heightened challenge of post-secondary education. This preparedness ultimately leads to a higher success rate for post-secondary graduation, a higher rate of employment, and higher lifetime earnings since having a post-secondary degree is directly related to positive economic benefits.

Ohio’s dual enrollment programs can be traced back to 1989 with the creation of the Post-Secondary Enrollment Options Program (PSEOP). This program was initially intended to offer high school juniors and seniors the opportunity to earn college credit and was expanded to include freshmen and sophomores in 1997. In 2015, the Ohio General Assembly implemented a new dual enrollment program, CCP, to correct the identified shortfalls of PSEOP, including providing the necessary funding to support the program and its participants.

One specific goal of the changes implemented with CCP was to improve participation amongst eligible students. As seen in the table to the right, the number of credit hours earned by students participating in CCP has more than tripled compared to the final year of PSEOP.

Annual Credit Hours Earned



During the final three years of PSEOP, as shown in **green** on the chart to the left, the total number of credit hours earned by participants hovered around 200,000 annually.

Under the laws governing CCP, the number of credit hours earned, as shown in **blue**, has more than tripled.

Due to the transition from PSEOP to CCP and the change of data collection methods, information from 2016 and 2017 was excluded from the chart.

Source: ODE

Efficient • Effective • Transparent

The purpose of dual enrollment programs generally is to enhance a student’s post-secondary success while improving the career readiness of those graduating from high school. As an additional benefit of CCP, students and families save money on tuition costs by completing certain course credits during high school. According to the 2021 CCP Annual Report, Ohio students have saved over \$833 million in tuition savings since CCP’s inception, underscoring the impact of offering state funded dual enrollment to students.

Stakeholder Roles and Responsibilities

ODE and ODHE have varying roles and responsibilities related to CCP but the two departments are considered partners and, along with the CCP Advisory Committee, regularly collaborate on the program and related decisions. Along with these two departments, colleges and universities, K-12 school districts (school districts), and students all play an important role in the success of CCP.

ORC and OAC establish both the roles and responsibilities of the major stakeholders in CCP. Along with these stakeholders, the Chancellor of Higher Education (the Chancellor) and Superintendent of Public Instruction (the Superintendent) are also given major roles. The following are high level perspectives for each stakeholder and the corresponding roles and responsibilities.

ODE is responsible for verifying collected data, directing payment of CCP participant tuition, awarding funds to nonpublic and home school applicants, and communicating CCP program details; ODE is also responsible for the mediation between school districts and colleges regarding course offerings and tuition rates. ODHE is responsible for communicating CCP program details, reporting collected data, and ensuring data reporting compliance among colleges and universities. Currently, the main role of ODHE is communicative; the burden of implementation falls on the students, the school districts, and the colleges and universities. As mentioned, while ORC gives these responsibilities to these two departments respectively, both departments discuss and collaborate with each other before making final decisions.

ORC § 3365.02 mandates that all public Ohio colleges, universities, and school districts must participate in CCP. Colleges and universities must report required data to the Chancellor, feature CCP details on the institution's website, send pre-term notices of admission, and provide academic counseling to CCP participants. Colleges and universities are also responsible for developing model course pathways for secondary school students as well as providing professional development and classroom observation for CCP courses that are being taught in school districts by school district instructors that have met CCP credentialing requirements.

School districts must permit students to enroll in CCP, offer counseling to CCP participating students, and provide program information along with eligibility requirements, the consequences of not completing a course, and the responsibilities of the student. School districts typically provide this information at an annual mandatory College Credit Plus informational session to allow each participating college that is located within thirty miles of the school to meet with

interested students and parents. School districts are also required to promote CCP on their websites along with providing details for the current agreements with participating colleges and universities.

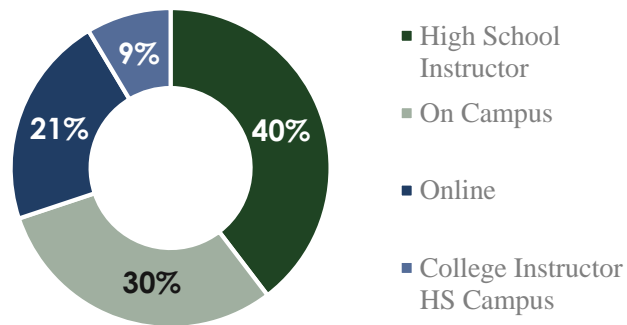
The Chancellor and the Superintendent must collaborate on the reporting of CCP on an annual basis, and this is done through an annual report that is posted on both Department’s website⁴. These two positions have the ultimate responsibility of continuing CCP and improving the program as it relates to Ohio students and its taxpayers.

Delivery Models

Students who participate in CCP can choose one of four learning methods, referred to as delivery models. The choice of delivery model for courses is based on a variety of factors, including availability, which may not be within the control of the student. For example, a student may wish to take a specialized course that is not offered through the high school that can be taken online. In each delivery model, the student is taking a course from the college or university. This means that they are an enrolled college student and, upon the successful completion of the course, the student would have a college transcript showing the credits earned. A description of each of the delivery models can be found on the following page.

While students in Ohio may enroll in courses using one or a combination of delivery models, in Ohio nearly half of all courses were taken in a high school setting, either with a high school teacher or a college professor administering the coursework. This matches national trends which suggest that dual enrollment programs offered in high school settings are the most popular option. In addition to being the most prevalent delivery model in Ohio, the High School – Approved Secondary Teacher delivery model also results in generally better performance outcomes for students relative to the others; average GPA is higher within this delivery model while the rate of course failures is lower.





AY 2020 Credit Hours by Delivery Model



Source: ODE

⁴ Per ORC § 3365.15, the requirement to publish an annual report expires in December 2023.

CCP Delivery Model Options

COLLEGE		On Campus Learning		
		LOCATION College / University	EDUCATOR College Faculty	PEERS College Students
Students would generally be responsible for arranging transportation to and from the college campus and would need to work with their district to ensure appropriate scheduling.				
HIGH SCHOOL		High School Instructor		
		LOCATION High School	EDUCATOR High School Teacher with Credentials	PEERS High School Students
		College Instructor		
		LOCATION High School	EDUCATOR College Faculty	PEERS High School Students
A college employee comes to the high school to teach courses.				
DIGITAL		Online Learning		
		LOCATION Online [Occasionally College for Testing]	EDUCATOR College Faculty	PEERS College Students
Online courses may require transportation to the college campus in order to take tests, but the majority of work is self-guided using online materials.				

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Program Funding

There is no specific funding set aside for CCP operations.⁵ That is to say, the state’s biennial budget does not set an appropriation that is used to oversee and ensure compliance with program requirements; any expense associated with the management of the program is absorbed in the general operations budgets of each department and stakeholder.⁶ Instead, as discussed above, colleges and universities, and districts, are responsible for ensuring students have the information and support necessary to successfully participate in CCP. While there is no operational funding, the program uses millions of dollars in state funding annually to ensure that students may participate in the program at no cost.

Course Enrollment Payments

Colleges and universities with CCP students enrolled receive payments from ODE that are similar to tuition payments a traditional student would be responsible for. ODE is responsible for transferring funds to colleges and universities based on fee structures known as default rates which are identified as the default ceiling and default floor amounts in ORC § 3365.01. The default rates are formula based and differ based on the educational delivery model. The rates include a ceiling, which represents the highest allowable charge per credit hour, and a floor, which represents the lowest allowable charge per credit hour. Colleges and universities may not charge less than the floor without the approval of the chancellor. The current rates, as identified in ORC § 3365.01, are as follows:

Default Ceiling Rate: For AY 2022, the ceiling rate was set at \$166.55 per credit hour. Colleges and universities may charge this rate for both On College Campus and Online courses.

Default Mid-Level Rate: This rate is set at 50 percent of the ceiling rate. For AY 2022, this is \$83.28 per credit hour. Colleges and universities may charge this rate for courses taught through the High School – College Faculty delivery method.

Floor Rate: This rate is set at 25 percent of the ceiling rate. For AY 2022, this was \$41.64 per credit hour. Colleges and universities may charge this rate for courses taught through the High School – Approved Secondary Teacher delivery method.

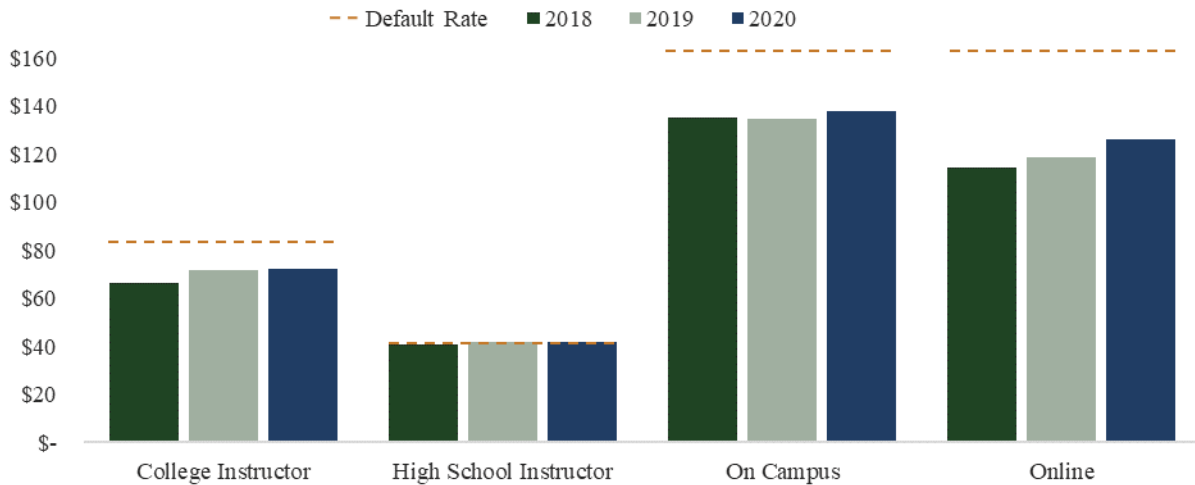
While these default rates are set colleges and universities and districts may negotiate with each other for an alternative payment structure, so long as it does not fall below the default floor amount, or exceed the lesser of the applicable default rate or the college or university’s standard

⁵ The biennial budget does provide earmarks to fund CCP participation for students that attend non-public schools or that are home schooled. Additionally, there have been two grants issued through ODE that provide funding specifically for teachers seeking CCP credentials, as discussed in [Recommendation 3](#).

⁶ ODHE employs two full-time positions dedicated to implementation and oversight functions.

rate, for each instructional model.⁷ The following chart shows the average rate charged per credit hour for public school districts in each year between AY 2018 and AY 2020.

Delivery Model Average Rate Per Hour by Year



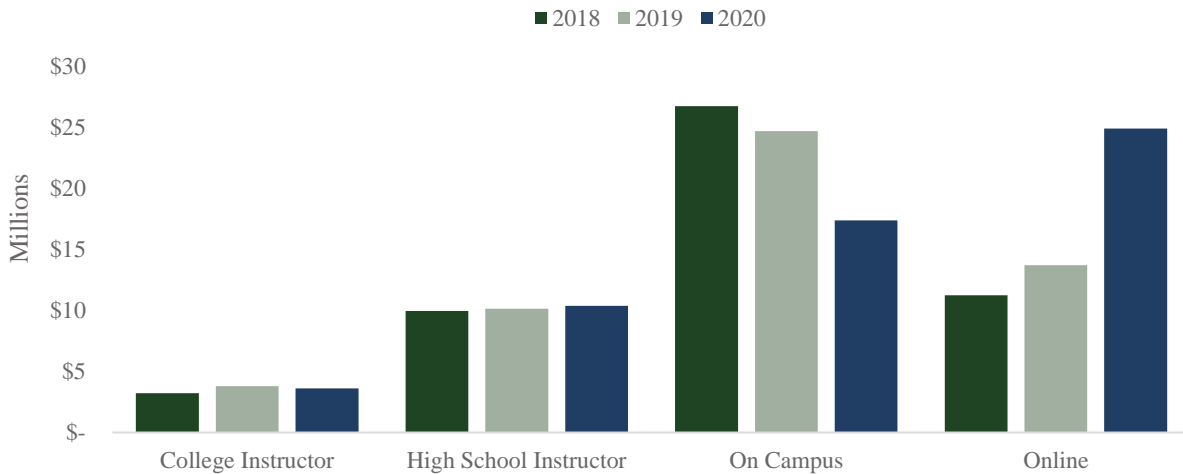
Source: ODE

Notably, this chart shows that on average colleges and universities are negotiating fees that are less than the default rates for three of the four delivery methods. The fourth delivery method, High School – Approved Secondary Teacher, has a cost per credit hour which represents the floor, or minimum payment. As such, it is to be expected that the cost per credit hour for this method would not be lower than the default rate.

If a participating student is enrolled in a public school, the transfer of funds comes as a deduction from the state foundation funding provided to the student’s home district. The following chart show program-wide tuition deductions from school districts by delivery model in AY 2018 through AY 2020.

⁷ ORC § 3365.07 outlines special maximum allowable rates for non-public secondary school participants and private colleges and universities.

Delivery Model Deductions per Year (AY 2018 - 2020)



Source: ODE

Notably, in AY 2020, ODE deducted approximately \$25 million in foundation funding from districts statewide to pay for CCP related fees for courses taken through online delivery models. By comparison, only \$10 million in foundation deductions were made for courses taken through the High School – Approved Secondary Teacher model. However, during that year, nearly twice as many courses were taken using the High School – Approved Secondary Teacher delivery method compared to the online delivery method.

If a student attends a non-public school or is home schooled, the transfer of funds comes from ODE using funds from a set of earmarked after the courses have been approved. This earmark is set in the biennial budget. If the number of courses that are requested exceed the available funding, it is distributed on a prorated basis using a sliding scale that allows students in higher grade levels to enroll in more course than those in lower grade levels.

State Share of Instruction

Public colleges and universities in Ohio typically receive funding from students through tuition and fees and from the state through the State Share of Instruction (SSI), which is intended to subsidize the cost to educate Ohio residents. CCP students that are enrolled at public colleges and universities generate SSI revenue for those institutions. SSI is distributed based on a complex formula that takes into account course completions, program completions, and socioeconomic factors. All public institutions that have CCP students that complete courses would receive some amount of SSI funding associated with these students.

Participant Results

The program has been successful in terms of total participation growth compared to PSEOP. As previously discussed, the number of credit hours earned has effectively tripled under CCP compared to PSEOP. Additionally, the number of students that participate has grown in each year of the program’s existence.⁸ While the program is available to students beginning in 7th grade, the vast majority of participants are in 11th and 12th grade, which is consistent with national participation trends. On average, CCP participants earn approximately 14 college credits in the program, or the equivalent of about one semester’s worth of college. Most participants earn at least 6 credits. For the average CCP student that earns approximately 14 credit hours in the program, there is roughly \$4,400 in tuition, fee, and textbook cost avoidance. The top quartile of program participants save an average of roughly \$11,800.

“Participating in CCP allowed me to take fewer courses as a freshman, which gave me time to adjust to college. I also was able to take on an internship, and I will be able to graduate in four year.”

- Current College Student

Students that participate in CCP are more likely to enroll in college than their peers. The percent of CCP students that enrolled in college after high school ranged from approximately 68 to 78 percent from 2016 through 2020, while only 53 percent of students that did not participate in CCP enrolled in college in 2016 and 2017. Those CCP students that enroll in college after high school are also more likely to remain in college, which is measured by ODHE and identified as persistence. CCP students have high and consistent rates of persistence from year one to year two in undergraduate enrollment, ranging between approximately 94 and 95 percent from 2016 to 2021. During this same timeframe, the statewide average of persistence for students from year one to year two in college was 57 percent.

Based on the rate of persistence from year one to year two of college, it is not surprising that participating in CCP has had a significant impact on reducing the college dropout rates.⁹ As shown in the chart below, college dropout rates amongst CCP participants were significantly lower than those of non-CCP participants in the high school graduating cohorts of 2016 and 2017. The dropout rate amongst CCP participants also fares much better than the national statistic in 2021 of 40 percent, according to *educationdata.org* (November 2021).

⁸ Participation declined in AY 2021, however this is largely attributed to difficulties related to the COVID-19 pandemic.

⁹ There is no universal definition of dropout. In order to conduct this analysis, we developed a working definition. As such, we defined a dropout as, “a student which graduated high school in 2016 or 2017, was enrolled as an undergrad immediately after HS graduation, and then was not present in the HEI data for at least 2020 and 2021, while not obtaining a degree at any point.

CCP participants that enroll in college and complete their chosen program do so with approximately the same number of total credit hours as their peers. This means that, for the average CCP participant entering college with 14 credit hours, they may be able to graduate on an accelerated timeline or take on an additional part-time job to help pay for the expense of higher education. They may also decide to take a reduced course load to better understand their materials. The credit hours students obtain via CCP allow them to be flexible with their education and make choices that benefit their individual situations.

“Because of CCP, I was able to finish my undergraduate degree in 18 months. I took two years off before returning to college and have obtained a master’s degree and I’m now halfway through a PhD program.”

- Current College Student

From the program’s inception, CCP participants have earned over 6,800 bachelor’s degrees and over 7,500 associate degrees. For those students graduating high school in the 2016 cohort, more CCP participants have earned, or are in pursuit of, an advanced degree at a higher proportional rate than their non-CCP peers.

**Advanced Degrees: CCP vs Non-CCP
2016 HIGH SCHOOL GRADUATING COHORT**

	CCP	Non-CCP
Students With or Pursuing Grad Degree	1,250	2,302
Total High School Grads	23,322	74,082
Percentage With or Pursuing Grad Degree	5.4%	3.1%

Source: HEI

Audit Overview

Because CCP is a program that is managed jointly by ODE and ODHE, we worked with both departments to determine the appropriate scope and objectives for this project. We analyzed four scope areas relating to program operations and effectiveness and identified 10 recommendations and one issue for further study that could improve overall program participation and performance. These findings have been organized into two sections on program participation and program operations.

Audit Methodology

Program Review

We first focused on understanding how the program functions. This included an in-depth review of the program’s history and purpose, the program’s relevant ORC and OAC, its funding model, and the roles of stakeholders. We conducted this research primarily through review of the publicly available code and rule, and through interviews with representatives from ODE, ODHE, and key individuals involved in the creation of the program.

Stakeholder Feedback

Once we achieved an understanding of the program’s function and identified the major stakeholders involved, we solicited feedback from those groups. The primary tools we used for that were a comprehensive survey of Ohio’s K-12 school districts, and individual interviews with colleges and universities.

We administered the K-12 survey in November of 2021 to all public school districts, as well as to the contacts ODE was able to provide for community schools. The survey asked questions regarding district management and faculty perceptions of the program as they relate to concepts such as methods of delivery, barriers to participation, and program communication and promotion efforts. The survey yielded a response rate of 31 percent.

College and university interviewees participated on a voluntary basis, and initial selection was based on CCP participation stratifications. We placed all public college and universities in order according to their respective CCP participation rates as a percentage of enrollment and then grouped them into high, mid, and low utilization categories. We then requested interviews with 30 institutions- 10 from each group. This was done in order to get a broad range of feedback and to avoid the data being skewed by only those that utilize CCP very heavily or not much at all. We ultimately conducted 20 interviews in October of 2021. Similar to the K-12 survey, the interview questions sought to elicit feedback about CCP program perceptions regarding delivery methods, costs, barriers to participation, student preparedness, program operations, and teacher credentialing.

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We were also able to obtain feedback from a limited sample of former CCP students at the University of Cincinnati, Shawnee State University, and Northwest State Community College. We asked similar questions related to their experiences with the program.

Data Regression Analysis

Data analyses were conducted on a multitude of facets of the program. We calculated CCP usage for each school district using funding deduction reports, normalized on a per student basis in grades 7 through 12. Based on these participation rates, we were able to run regression analyses to identify trends, patterns, and relationships between program participation and a myriad of variables. We were also able to measure the impact that factors like program promotion and communication, and stakeholder compliance with program requirements have on program participation. HEI data was also leveraged to analyze program outcomes.

Summary of Results

According to a national study conducted by NCES, approximately 34 percent of graduating seniors participate in dual enrollment programs. We found that the CCP program is in-line with this national average for participation. Approximately 35 percent of graduating seniors in Ohio participate in CCP and graduate with some college credit. As previously discussed, for those participants, a significant cost savings can be achieved through the avoidance of tuition, fees, and books. The credits earned through CCP can be used in a variety of ways, such as completing a program on an accelerated timeline or taking on a part-time job to help pay for college expenses.

In some instances, students are graduating from high school with certificates, associate degrees, and in rare occurrences bachelor's degrees. These students that take advantage of the program at this level are able to jump-start their careers and boost their lifetime earning potential; all at little to no cost to their families.

While more students are participating in dual enrollment and earning more college credits through CCP compared to PSEOP, there are areas where it can be improved. We noted that, similar to national trends, the participation rates for minority and economically disadvantaged students lag that of the total student population. For these students, participation in the program would be most beneficial. Participating in dual enrollment has been shown to be a powerful tool in bridging the achievement gap in these populations. ODE and ODHE acknowledge this participation gap in the annual report, but little to no strategic planning is conducted to address these shortfalls. Our audit identified 10 recommendations and one issue for further study that can help ODE, ODHE, the General Assembly, colleges, universities, and public school districts improve the operations of this program in order to further encourage participation, both amongst the general student population and amongst targeted populations.

Recommendation 1: Providing information and promoting CCP to families encourages and increases program participation. Traditional school districts are required by law to begin providing information regarding CCP to students and families beginning in 6th grade. However,

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several districts self-reported that they failed to comply with this requirement and there is wide variation as to when information is first provided to families. ODE is broadly responsible for administering the educational policies of the state including the administrative responsibilities of school officials and personnel and should work to ensure compliance with requirements specific to CCP. ODE and ODHE should take a larger role in the marketing, communication, and compliance of the program. As a part of this, the Departments should consider, using rule writing authority if necessary, developing standard communication forms that Districts would be required to use to eliminate confusion regarding the use of state funding for the program. Ensuring consistent communication and marketing of the CCP program and offering clear CCP enrollment forms will help to increase program participation.

Recommendation 2: College courses can be taken through CCP on a college or university campus, in a high school setting, or online. Currently, the CCP delivery methods that are the most easily accessible to students are those models which are held at a high school campus. In order to improve overall CCP participation rates, school districts should work to increase the number of classes available in the high school setting. This will require decisions to be made at the local district level based on the needs of the community. In some instances, it may require the credentialing of additional high school teachers, sharing credentialed teachers among school districts, or leveraging county Educational Service Centers to provide CCP instruction. In others, it may require strong partnerships with colleges or universities to provide professors on the high school campus. By expanding access to CCP courses at the high school, students will be able to more easily participate in the program.

Recommendation 3: The General Assembly has allocated a total of \$8 million in grant funding for the purpose of increasing the number of CCP credentialed high school teachers which was jointly administered by ODE and ODHE. The most recent grants were awarded in FY 2020 and provided funding through FY 2023. Individuals and districts were awarded funds to be used towards graduate coursework necessary to become credentialed to teach CCP courses. Grantees received funding through a reimbursement of expenses once claims were verified by ODE. However, the law did not grant ODE the authority to require that individuals complete the credentialing process. This means that grant funding may not be maximized as individuals may ultimately choose to not seek out credentialing. If future grants are awarded, ODE and ODHE should work with the General Assembly to require the attainment of CCP instructor credentials as a condition of the award, along with a required service period. Doing so would help to ensure that the grant funds are fully maximized for their intended purpose of increasing the number of CCP credentialed teachers. In turn, this could result in increased program participation.

Recommendation 4: Traditionally underserved students, particularly those that are low-income or minority, participate in the CCP program at a lower rate than their peers. The reduced rate of participation is due, in part, to barriers that these populations face that impact the ability to attend courses online or on campus. To improve program participation, ODE and ODHE should work to minimize barriers to participation such as limited access to support services and high speed internet for these students. In doing so, the Departments can improve CCP participation rates for traditionally underserved students, allowing more families to take advantage of program benefits,

including exposure to advanced educational opportunities and cost savings associated with pursuing post-secondary education. As additional data is collected and incorporated into long-term strategic goals, ODHE and ODE can work with colleges and universities and districts to design and expand targeted initiatives to further address barriers and develop a plan to increase participation.

Recommendation 5: For those students who choose to attend CCP courses at a college or university, there is little to no program specific orientation available to them. While colleges and universities have orientation programs for traditional students, new CCP students may not benefit from those to the same degree as orientations specifically tailored to them. ODE and ODHE should work with colleges and universities to ensure there is a robust and uniform orientation program for CCP participants. These orientation programs should be designed in a way that the comfort level of CPP participants is increased as they navigate college course and so that they are prepared for the rigor and expectations of college courses.

Recommendation 6: The CCP program does not have distinct, progressive, measurable program goals supported by routine data analysis and evaluation. While ODHE and ODE both collect significant amounts of data related to the CCP program and student participation, this information is focused on outputs, such as the number of courses taken in a year, and not outcomes, such as reduction in time spent pursuing a degree or certificate program. As appropriate program oversight is established and data collection is enhanced to include outcome data, formal goals and metrics should be developed to ensure desired programmatic outcomes are being achieved and to identify areas for improvement.

Recommendation 7: The laws governing CCP establish specific duties for ODHE and ODE related to the distribution of funds and data collection and reporting. They further require the establishment of an advisory committee to assist in the development of performance metrics and monitoring of the program’s progress. However, the laws do not identify who is responsible for overall program oversight. ODHE, ODE, and the CCP advisory committee should work with the General Assembly to clarify and strengthen the management, oversight, and compliance monitoring functions necessary to allow CCP to reach its potential. In doing so, they should consider what structures and resources will be necessary to continue to monitor and improve the program in order to provide strategic direction that will support the evolving needs of Ohio’s students, economy, and workforce.

Recommendation 8: There is a significant amount of data collected by both ODHE and ODE regarding the CCP program, and the content and quality of this data exceeds that of most peer state dual enrollment programs. This data is largely related to program participation while students are in high school and is used to comply with annual reporting requirements that provide historic detail on the outputs of the program. While the data collection practices used by ODHE and ODE are generally good in comparison to peer states, there is room for improvement. In some cases, there are data fields that are incomplete, particularly as it relates to demographic information, and data that is inconsistent in nature, such as identifying the type of courses being taken. This type of information is critical in identifying where program improvements could be

made. Both ODHE and ODE should work to ensure that the CCP data collected is both complete and consistent. This information can then be leveraged to identify and work towards strategic programmatic goals.

Recommendation 9: When a student takes college courses through the CCP program, ODE directs payment to the college or university based on a default rate that is specified in ORC. The default rate varies based on the delivery model and contains both a maximum and minimum charge. The current formula that establishes the default rate uses a set dollar amount identified in ORC as a baseline and has not been significantly updated since the program first began. The General Assembly should review the default payment rates to ensure that they appropriately reflect the current cost to IHE’s to provide CCP courses to high school students. In doing so, the General Assembly should consider how future changes to the foundation funding model might impact the program’s default fee rates.

Recommendation 10: In addition to CCP participation fees, school districts are also required by law to cover the costs of textbooks, which can be costly. One way to reduce the impact of purchasing textbooks is through the use of open educational resources (OER), which are freely accessible, openly licensed text, media and digital assets including college textbooks, online supplements, etc. While efforts have been made to expand opportunities for the use of open educational resources in the state, their current utilization appears to be limited. The General Assembly should require ODE and ODHE promote opportunities to increase the use of OER materials among CCP participants and could consider splitting the cost of educational materials between colleges and universities and high schools. A strategic effort should be made to align existing and available OER materials with CCP courses offered among the State’s various colleges and universities. Collaborative efforts should be aimed toward gaining wider acceptance and adoption of OER materials among Ohio’s colleges and universities. Increased adoption of OER textbooks would reduce costs to school districts, which could, in turn, encourage further participation in the program.

Issue for Further Study: Public colleges and universities receive funding from the state through the State Share of Instruction (SSI) to subsidize the cost to educate Ohio residents. This funding is based on a complex formula that takes into account student enrollment and academic outcomes and is based on detailed cost information reported by institutions to ODHE within the Higher Education Information (HEI) system. The formula does not differentiate CCP students based on course delivery model. This means that a CCP student using the high school instruction delivery method would generate the same SSI value as an on-campus CCP student. As a result, the SSI funding received for the education of CCP students may be outsized relative to the actual costs of that education. ODE and ODHE should work with the General Assembly to re-evaluate how to best set and deliver SSI payments to ensure the payments align with the costs incurred by colleges and universities to deliver CCP services.

Noteworthy Accomplishment

In addition to our recommendations, we identified one noteworthy accomplishment that occurred during the course of our audit. CCP has historically relied on multiple measures to determine student eligibility, which is considered a best practice according to *Unlocking Potential: A State Policy Roadmap for Equity and Quality in College in High School Programs* (The College in High School Alliance and Level Up, 2019). These measures included minimum grade point averages, standardized test scores, and academic recommendations. The eligibility requirements were taken into consideration on a sliding scale basis, so for example, someone with low test scores but a high grade point average may still be considered eligible for the program.

In 2020, as a result of the COVID-19 pandemic, eligibility requirements were relaxed. Changes were made to eligibility requirements that allowed students to participate using only grade point average as the determining criteria. Initial data showed that using grade point average to determine eligibility did not result in a drop in academic performance from CCP participants. The CCP Advisory Committee proposed changes to eligibility to be made permanent. The state's biennial budget bill passed in 2021 included language requiring ODE and ODHE to develop rules that would identify additional eligibility measures. Eligibility changes implemented by HB 110 (134th GA) resulted in new OAC Rule 3333-1-65.14, which, which allows for students to be considered eligible if they meet one of three criteria:

- Obtain a remediation-free score on one of the approved standard assessment exams set forth in paragraph (D)(2) of rule 3333-1-65.3 of the Ohio Administrative Code; or
- Have a cumulative unweighted high school grade point average of at least 3.0; or
- Have a cumulative unweighted high school grade point average of at least 2.75 but less than 3.0 and receive an A or B grade in a relevant high school course.

The changes to eligibility requirements allow for increased program participation by reducing reliance on standardized tests. In particular, this may allow for increased participation amongst economically disadvantaged and minority groups that traditionally do not perform as well on standardized tests.

Additional Advantages

North Central State College has a program which offers extended tuition benefits to participating CCP students. The institution offers free tuition beyond high school graduation for those students that attend CCP courses through North Central State College. Students must earn a minimum GPA of 2.75 in order to be eligible for this tuition benefit.

This program is mutually beneficial to students and the college. Eligible students are able to complete programs with little to no tuition expenses. The college has benefited by increasing its long-term subsidies through state funding because CCP students are able to complete programs and graduate faster than a traditional student, which increases the amount of SSI revenue. The college has indicated that graduation has increased by 30 percent since 2018 as a result of this program.

Program Participation

CCP is intended to provide high school students the opportunity to pursue college-level courses at little to no cost. By allowing individuals to obtain college credit while still in high school, this program benefits students and families by reducing the financial burden of attending college after high school graduation. Under the law and rules governing CCP, traditional public school districts must offer eligible students the opportunity to participate in the program. We reviewed available data related to CCP participation and outcomes and conducted interviews with students, traditional school districts, colleges, and universities in an effort to identify strategies for increasing participation and student success in the program.

Background

Dual enrollment programs date back to the 1950s when the Provost at the University of Connecticut initiated a program allowing local seniors to enroll at the university. The idea behind this first program was to provide additional academic challenges to high achieving students while simultaneously providing them a head start for college.

In Ohio, the first formal dual enrollment program was the Post-Secondary Enrollment Options Program (PSEOP), which was enacted into law by the General Assembly in 1989. This original program was designed for students in 11th and 12th grades and was expanded in 1997 to include students in 9th and 10th grade. While this program provided opportunities to some students, it had several areas where it fell short or had challenges. For example, some districts required excessive college coursework in order to earn high school credit. Districts also limited the ability of some students to participate in extra-curricular activities. Additionally, some colleges and universities required higher admissions standards for PSEOP students compared to traditional incoming freshmen.

CCP was designed to address these issues, create a uniform dual enrollment model, and encourage increased participation in the state's dual enrollment program. Overall, it has successfully increased participation during the first five years of the program. During AY 2016, the last year of PSEOP, approximately 190,000 credit hours were taken by participating students. The number of credit hours taken during AY 2021 school year by CCP students was more than 650,000, an increase of approximately 240 percent.

What We Looked At

We reviewed available data to determine what opportunities for increased participation existed and where resources and efforts should be focused. In particular, our focus was on identifying areas where participation could be improved amongst low-income and minority students, as these groups tend to lag the overall statewide participation rate.

To perform our analysis, we conducted interviews and surveys with districts, institutions of higher education, and past program participants. We also used data from ODHE and ODE for a regression analysis¹⁰ to determine the significance of certain demographic characteristics. This type of analysis shows how each variable interacts with the other. Due to the large number of variables that could impact participation, our analysis was designed to identify a narrow list of actions that could be taken in order to improve participation rates. In total, there were 22 tested variables that were considered statistically significant. An explanation and extended table of each variable can be found in [Appendix C](#).

Why We Looked At This

The CCP program is relatively new, having been in operation for six years. During this time, tens of thousands of Ohio families have taken advantage of the dual-enrollment opportunity. While the program's annual report provides significant data regarding program outputs, such as the number of courses attempted and credits earned, there is little published on program outcomes and impacts, such as those related to graduation timelines, college dropout rates,

CCP Hours per Student (7th through 12th grade)

In order to determine program participation on a district-by-district level and conduct meaningful statistical analysis, we created a metric titled CCP Hours per Student to serve as a baseline for participation. This provides a common variable among our various analyses and allowed us to control for district size.

This metric uses the average total CCP credit hours from AY 2018-2020 in a district divided by the average enrollment of 7th through 12th graders in the district during the same time period. In some instances, a single year of data was used for analysis purposes.

Due to limited data, the metric does not take into consideration if a student would be academically eligible to participate in CCP and rather identifies the entire student population that might be eligible to participate under the grade parameters in law.

¹⁰ A regression analysis models the relationship between two variables.

or workforce and economic implications.¹¹ We looked at program participation and student experience to determine the impact this program is having on Ohioans and to identify areas where targeted efforts could result in improvements.

What We Found

CCP is open to students in 7th through 12th grade who meet certain academic eligibility standards. These eligibility requirements may vary from institution to institution, based on individual standards. Students must first apply for admission to the institution and then enroll in courses as they are available. Students have four potential CCP course delivery methods to choose from. The delivery method is dependent upon the availability of the course offerings at the time of the students' enrollment. The four delivery methods are:

- On a College Campus with a College Instructor;
- Online with a College Instructor;
- On a High School Campus with a College Instructor; or
- On a High School Campus with a High School Instructor.

No matter which delivery method is chosen, if the student successfully completes the course, they are eligible for both high school and college credit. The cost associated with courses is paid for using a portion of the state foundation funding the district receives for the student, and funds are transferred to colleges and universities directly by ODE. While a family may choose to pay for courses, students are eligible to take up to 120 college credit hours in the program at no cost. As a result, it is possible for individuals who take advantage of the program to graduate from high school and college concurrently.

In the most recent annual report, which covers AY 2021, approximately 76,000 students across the state were enrolled in CCP. The majority of these students, 91 percent, were in grades 9 through 12.¹² Franklin County had the highest total enrollment with approximately 5,500 students or 10 percent of the eligible student population (the total number of students in grades 9 through 12 within the county). Shelby County, located just north of Dayton, had the highest rate of student participation with 39 percent of eligible students enrolling in the CCP program. Overall participation ranged from 6 to 39 percent, with the median county participation rate being 15 percent. The variation in participation rates on a county level suggests that some districts may have embraced participation amongst their student populations more than others.

¹¹ According to ODHE, the standard measurement of graduation rates for baccalaureate programs is six years. With the first participants in the CCP program graduating in 2016, a complete data set would not be available until the 2022 higher education data is submitted. The 2016 cohort would represent the first-year CCP participants and would have only had one year of CCP participation. For further assessments of program outcomes, see [Appendix B](#).

¹² Of the remaining students, 0.6 percent were enrolled in grades 7 and 8 and approximately 8.3 percent had an unknown or unreported grade level.

Of the total students that used CCP in AY 2021, over 92 percent of students maintained a 2.0 GPA or higher with 77 percent maintaining over a 3.0 GPA. During AY 2021, there were a total of 1,512 credentials earned. These credentials include both a certificate and an associate degree, with 75 percent of the credentials earned being an associate degree. In total, there was nearly \$160 million saved in tuition costs for students using CCP during AY 2021.

While CCP has provided thousands of high school students the opportunity to jump start their college courses, it has historically been underutilized by minority students and those students who are considered economically disadvantaged.¹³ In AY 2021 for example, 17 percent of the total high school student population was African American. However, of the high school student population participating in CCP, only 5.5 percent were African American. Similarly, in AY 2021, nearly half of Ohio’s students met the criteria for economically disadvantaged, but only 17 percent of CCP students met the criteria.¹⁴ As discussed in [Recommendation 4](#), these populations face barriers that make attending courses online or at a college campus more difficult, which may, in turn, limit or prohibit participation.

One criticism of CCP is that students “waste” the credits earned through the program by taking the same number of courses as non-participants once enrolled as a traditional student, and graduating with far more credits than required. However, for those enrolled in an associate or bachelor’s program, we were able to review the total number of credits at the time of graduation or program completion for both CCP participants and traditional students. Our analysis found that CCP students that earned associate and bachelor’s degrees in 2021 graduated with roughly the same number of credit hours as traditional students. This means that CCP students do not appear to take more college coursework than necessary compared to their peers. For the average CCP student, this is approximately one semester’s worth of courses that they do not need to take as a traditional student. From student interviews, we were able to capture how some CCP students were using the flexibility associated with their CCP credits after high school graduation. These include:

- Saving money on out-of-pocket tuition costs;
- Taking fewer courses during semesters allowing more time to work during the school year; and,
- Exploring majors or classes outside of the required program pathways to potentially find a more fulfilling career after graduation.

¹³ “Economically disadvantaged” is defined in OAC 3333-1-65 as students who are members of households that meet the income eligibility guidelines for federal free or reduced-priced meals. Families that have a household income less than or equal to 185 percent of the federal poverty level qualify for this program; in 2022, a family of four with a household income of \$26,500 would be at the federal poverty level. Students are additionally identified as economically disadvantaged if the household participates in Medicaid, Supplementary Nutrition Assistance Program, supplementary security income, federal public housing, or low-income home energy assistance program.

¹⁴ The total number of minority and economically disadvantaged students eligible for the program is unknown since eligibility is partially based on GPA and standardized test scores, and these data points are not available due to privacy protections.

These findings ultimately led us to identifying five recommendations that will help to improve the overall participation rate in the program, improve the student experience for those individuals who take courses through CCP, and save money for students and their families.

- **Recommendation 1:** Providing information and promoting CCP to families encourages and increases program participation. Traditional school districts are required by law to begin providing information regarding CCP to students and families beginning in 6th grade. However, several districts self-reported that they failed to comply with this requirement and there is wide variation as to when information is first provided to families. ODE is broadly responsible for administering the educational policies of the state including the administrative responsibilities of school officials and personnel and should work to ensure compliance with requirements specific to CCP. ODE and ODHE should take a larger role in the marketing, communication, and compliance of the program. As a part of this, the Departments should consider, using rule writing authority if necessary, developing standard communication forms that Districts would be required to use to eliminate confusion regarding the use of state funding for the program. Ensuring consistent communication and marketing of the CCP program and offering clear CCP enrollment forms will help to increase program participation.
- **Recommendation 2:** College courses can be taken through CCP on a college or university campus, in a high school setting, or online. Currently, the CCP delivery methods that are the most easily accessible to students are those models which are held at a high school campus. In order to improve overall CCP participation rates, school districts should work to increase the number of classes available in the high school setting. This will require decisions to be made at the local district level based on the needs of the community. In some instances, it may require the credentialing of additional high school teachers, sharing credentialed teachers among school districts, or leveraging county Educational Service Centers to provide CCP instruction. In others, it may require strong partnerships with colleges or universities to provide professors on the high school campus. By expanding access to CCP courses at the high school, students will be able to more easily participate in the program.
- **Recommendation 3:** The General Assembly has allocated a total of \$8 million in grant funding for the purpose of increasing the number of CCP credentialed high school teachers which was jointly administered by ODE and ODHE. The most recent grants were awarded in FY 2020 and provided funding through FY 2023. Entities were awarded funds to be used towards graduate coursework necessary to credential teachers to instruct CCP courses. Grantees received funding through a reimbursement of expenses once claims were verified by ODE. However, the law did not grant ODE the authority to require that individuals complete the credentialing process. This means that grant funding may not be maximized as individuals may ultimately choose to not seek out credentialing. If future grants are awarded, ODE and ODHE should work with the General Assembly to require the attainment of CCP instructor credentials as a condition of the award, along with a required service period. Doing so would help to ensure that the

grant funds are fully maximized for their intended purpose of increasing the number of CCP credentialed teachers. In turn, this could result in increased program participation.

- **Recommendation 4:** Traditionally underserved students, particularly those that are low-income or minority, participate in the CCP program at a lower rate than their peers. The reduced rate of participation is due, in part, to barriers that these populations face that impact the ability to attend courses online or on campus. To improve program participation, ODE and ODHE should work to minimize barriers to participation such as limited access to support services and high speed internet for these students. In doing so, the Departments can improve CCP participation rates for traditionally underserved students, allowing more families to take advantage of program benefits, including exposure to advanced educational opportunities and cost savings associated with pursuing post-secondary education. As additional data is collected and incorporated into long-term strategic goals, ODHE and ODE can work with colleges and universities and districts to design and expand targeted initiatives to further address barriers and develop a plan to increase participation.
- **Recommendation 5:** For those students who choose to attend CCP courses at a college or university, there is little to no program specific orientation available to them. While colleges and universities have orientation programs for traditional students, new CCP students may not benefit from those to the same degree as orientations specifically tailored to them. ODE and ODHE should work with colleges and universities to ensure there is a robust and uniform orientation program for CCP participants. These orientation programs should be designed in a way that the comfort level of CPP participants is increased as they navigate college course and so that they are prepared for the rigor and expectations of college courses.

Recommendation 1: Ensure that all School Districts Comply with Program Requirements

Providing information and promoting CCP to families encourages and increases program participation. Traditional school districts are required by law to begin providing information regarding CCP to students and families beginning in 6th grade. However, several districts self-reported that they failed to comply with this requirement and there is wide variation as to when information is first provided to families. ODE is broadly responsible for administering the educational policies of the state including the administrative responsibilities of school officials and personnel and should work to ensure compliance with requirements specific to CCP. ODE and ODHE should take a larger role in the marketing, communication, and compliance of the program. As a part of this, the Departments should consider, using rule writing authority if necessary, developing standard communication forms that Districts would be required to use to eliminate confusion regarding the use of state funding for the program. Ensuring consistent communication and marketing of the CCP program and offering clear CCP enrollment forms will help to increase program participation.

“Our biggest barrier to participation is a lack of information. We can create pathways all day long, we can credential instructors, and do all kinds of things, but if students don’t know about it, they can’t do it.”

- College Official

Impact

There are significant levels of non-compliance with program requirements among school districts, including those related to marketing the program on district websites, the timing of when CCP information is provided to students, and grade weighting. By requiring compliance for all districts, ODE will help to ensure that all students receive equal information regarding CCP and help to continue to eliminate barriers to the program.

Background

With the exception of OAC § 3333-1-65.5(A), which specifies consequences for school districts and colleges and universities for noncompliance with data reporting, and potential actions by the State Board of Education related to professional conduct violations, no formal compliance and oversight functions are expressly authorized in statute or rule to ensure school district compliance with the requirements of the CCP program. This has resulted in neither ODE nor ODHE ensuring school districts comply with their statutory and administrative requirements.

Some efforts at uniformity are apparent in Ohio law. Under ORC § 3365.15, the chancellor of higher education, in consultation with the superintendent of public instruction, must create a standard packet of information for CCP directed toward students and parents that are interested in the program. Our analysis noted that original versions of the standard information packet

templates as developed by ODE and ODHE were not always used by school districts. Rather, the standard templates were in some cases customized in such a way that may discourage participation in the program.

Methodology

We scheduled and conducted interviews with representatives of ODE and ODHE regarding agency roles and oversight functions, and reviewed the relevant codes and rules related to agency roles and responsibilities. ODE and ODHE representatives noted that, while there are certain requirements of school districts, the ORC and OAC contain no oversight mechanisms or penalties, with the exception of those found in OAC § 3333-1-65.5(A), for failing to adhere to CCP program requirements at the school district level.¹⁵

To better understand how ODE and ODHE handle compliance for CCP, OPT interviewed department representatives. During the interviews with ODE and ODHE representatives, it was stated there are currently issues around compliance with colleges, universities, and school districts as it relates to ORC. This statement led to further analysis of non-compliance within the CCP program.

K-12 Survey

We conducted a survey about the CCP program to capture K-12 district attitudes and perceptions of the program as they relate to the methods of delivery, barriers to participation, and promotion efforts. The survey was sent to all to public school district, community school, joint vocational school district, educational service center, and STEM school contacts available through ODE. We received a response rate of approximately 31 percent¹⁶. Survey responses have been used throughout this report to illustrate areas of high performance and potential improvement.

Impact of District Attitudes on Participation and Regression

We also conducted a regression analysis on the 242 districts with complete survey responses using district profile and CCP program information to determine other areas of high performance or need for potential improvement in the areas of CCP program marketing and participation. A full description of the analysis can be found in [Appendix B](#).

¹⁵ During the interview process, ODE and ODHE noted that funding can technically be withheld in certain instances of non-compliance as an enforcement mechanism, but would only be impactful to colleges and universities. See OAC § 3333-1-65.3(B) and OAC § 3333-1-65.5(A). The Departments also noted that this enforcement mechanism has never been utilized in practice.

¹⁶ The number of respondents by type is as follows: public school districts (262), community schools (38), joint vocational school districts (13), educational service centers (3), and STEM schools (2).

Form Template Analysis

We obtained the following forms from ODHE’s CCP webpage:

- Information session PowerPoint;
- Annual notice template;
- Counseling session template; and
- Intent to participate form template.

OPT categorized districts that responded to our survey and calculated, for each, a CCP Hours per Student (7th through 12th grade) value. Districts were grouped into one of three groups based on the CCP Hours per Student (7th through 12th grade) value, high use, medium use, or low use. Districts were then randomly selected from each group and OPT requested copies of the four forms listed above from each selected district. We then reviewed the materials provided by the districts to determine whether they differed from the templates provided by ODE and ODHE, and if they contained all the required material from the templates.

Analysis

Through interviews and survey responses, we were informed of several areas of noncompliance at the school district level. These areas include hosting CCP information on school district websites, initial student communication for CCP, GPA grade weighting, CCP promotional efforts, and use of inaccurate application or informational forms. It should also be noted that during the interview process, ODHE stated that they do not currently check to make sure that colleges and universities are not accepting students who do not qualify for CCP.

CCP Information on School District or Institution Websites

ORC § 3365.04(C) and ORC § 3365.05 require school districts, colleges, and universities to feature CCP information on their respective websites.

Survey results indicate that 109 respondents, or 37.1 percent, do not feature CCP on their district website. District groupings of those responding they did feature CCP on their website had an 8.8 percent higher CCP Hours per Student (7th through 12th grade) value.

Additional feedback from CCP program participants indicated that some districts appeared to actively discourage students from participating in CCP or made obtaining program information challenging.

“My high school didn’t share much information about CCP. I had to ask about it to get the information I needed to participate.”

- Current College Student

Initial Grade Level for CCP Communication

ORC § 3365.04(A) requires school districts to initiate communication about the CCP program to students beginning in 6th grade. Survey results indicated 130 respondents, or 43.6 percent, begin communication in high school; 156, or 52.3 percent, begin communication in middle school; and 12, or 4.0 percent, begin communication in elementary school. Districts that followed ORC and

indicated they initiated communication with students prior to high school had a 14.3 percent higher CCP Hours per Student (7th through 12th grade) value.

AP Promotion and Grade Weighting

ORC § 3365.04(E) requires school districts to give equal grade point average weight to CCP and advanced standing program coursework to include AP. However, 18 survey respondents, or 7.2 percent, indicated that their districts applied different weights to these two course types. Thirteen of the respondent districts have AP courses weighted higher than CCP and five have CCP courses weighted higher than AP. This practice of unequal grade point average weight is not permitted because it has the potential to negatively affect student standing within the district, as well as impact program participation, encouraging high performing students to select the program that would provide a GPA advantage.

In addition to the instances of potential non-compliance shown in the K-12 survey, interviews with colleges and universities indicated that it is possible that some school districts actively encourage AP over CCP. In our college and university interviews, two community colleges noted the following about K-12 district support of AP over CCP:

- Districts may perceive AP and CCP as competing programs.
- Districts promote AP more heavily than CCP.
- District attitudes about CCP may influence how a specific district may prioritize AP over CCP for its students.
- District grade weighting or inclusion in honors program recognition may be used to influence selection of AP over CCP.

To better understand the impact of noncompliance as it relates to AP versus CCP, we ran regression analysis to compare CCP participation when AP was the school districts perceived preferred method. Our regression analysis indicated a strong link between K-12 district promotion of AP, the selection and number of AP course offerings, and CCP participation. Additional analysis can be found in [Appendix B](#).

CCP Alternatives

For students seeking college credit, alternatives to CCP exist. These alternatives include Early College High Schools, Career-Technical Education, International Baccalaureate (IB) programs, and Advanced Placement (AP) courses.

Of these options, AP is the most prevalent in Ohio. Students taking AP courses must take an end of course exam and obtain an acceptable score to obtain college credit. Acceptance of these credits is a decision made by the individual college and university and standards may vary between institutions.

For analysis relating to the participation in AP courses compared to CCP at the district level, please see [Appendix B](#).

AP vs CCP Analysis

	High CCP Hours per Student	Medium CCP Hours per Student	Low CCP Hours per Student
Average Number of AP Subjects in a District	5.3	8.1	11.1
Average AP Enrollment as a % of 7th-12th Grade Enrollment	12.1%	15.8%	17.6%

Source: ODE

Use of Standardized Forms or Templates

While ODHE provides standard templates for program applications and forms, our analysis found that it was common for districts to edit the templates provided by ODHE prior to publication for use by district students and parents.

On the Intent to Participate form, more than half we reviewed differed from the template. Some districts added guidance for Option A (student pays) and Option B (district pays) but did not clearly indicate that Option B was the default. Multiple districts added initial lines related to the student being charged for the cost to the district if they fail a course. There were also multiple examples of online dropdown setups with many more specific selections rather than just indicating an intent to participate.

Regarding the Annual Notice form, 80 percent of the reviewed documents differed from the template. More than half of these were missing at least one element from the template, which commonly included the student participation options section of the template.

More than half of the PowerPoint presentations used for informational sessions differed from the ODHE template; however, only a few were missing elements of the template. There was at least one example of AP courses being outlined and referenced in the district version of the presentation.

These variations indicate that the information received by students and parents may vary based on what a district chooses to highlight. Participants could be discouraged by a more cumbersome form or a form that highlights costs to the family. In the absence of ODE monitoring the manner in which the templates are deployed, districts could potentially discourage participation through the tone and content of forms and presentations.

Conclusion

In order to ensure Ohio families and students are sufficiently informed of the CCP program, ODE and ODHE should validate that all districts are complying with program requirements relating to communication and marketing. Reducing non-compliance with program mandates, as set out in Code and Rule, will improve consistency and clarity in providing program information to students. Similarly, monitoring compliance on grade parity between CCP and AP courses will help ensure that students are treated fairly regardless of which program they may choose. Last, verifying that districts are not modifying standard forms to imply a significant financial outlay for the student will help maintain access for students with more limited ability to afford post-secondary opportunities.

Recommendation 2: Increase Access to CCP Courses at High Schools

College courses can be taken through CCP on a college or university campus, in a high school setting, or online. Currently, the CCP delivery methods that are the most easily accessible to students are those models which are held at a high school campus. In order to improve overall CCP participation rates, school districts should work to increase the number of classes available in the high school setting. This will require decisions to be made at the local district level based on the needs of the community. In some instances, it may require the credentialing of additional high school teachers, sharing credentialed teachers among school districts, or leveraging county Educational Service Centers to provide CCP instruction. In others, it may require strong partnerships with colleges or universities to provide professors on the high school campus. By expanding access to CCP courses at the high school, students will be able to more easily participate in the program.

“Each mode of delivery has benefits, but being in the high school building makes it the most accessible for all students and allows us to reach a wider berth of students. Especially the underserved or underrepresented populations.”

- K-12 Administrator

Impact

Scheduling and attending CCP courses at the high school allows students to easily schedule and attend classes in the course of a regular school day. By expanding the number and variety of courses offered at the high school, districts can encourage program participation amongst students while maintaining a supportive learning environment. Further, by offering courses in a high school setting, many of the barriers to participation for traditionally underserved populations, as discussed in [Recommendation 4](#), will be eliminated.

Background

Dual enrollment programs are generally acknowledged to be beneficial to those high school students who take advantage of them. According to a national study conducted by the National Center for Education Statistics (NCES), nearly 9 out of 10 high schools offer some sort of dual enrollment program.¹⁷ In Ohio, dual enrollment programs have existed in some form for more than 30 years and all traditional public school districts are required to participate in CCP, the state’s current program.

While districts are required to participate in the program, that does not mean that students have open access to college courses. There are a number of barriers that may impede a student from

¹⁷ <https://nces.ed.gov/pubs2019/2019430.pdf>

taking advantage of CCP. One such barrier to participation across the program is access to appropriate courses. CCP students may find themselves unable to enroll in a traditional on-campus course due to limited availability or scheduling conflicts with required high school courses. Ensuring that access to CCP courses is maximized at the district level is an important step in improving overall program participation as doing so would help to alleviate some of the challenges associated with balancing schedules at two different locations. Maximizing opportunities in the high school setting would also reduce those unique barriers that are significant to underserved student populations, see [Recommendation 4](#).

High school instructors that teach CCP courses must undergo a credentialing process. This typically means that additional subject-specific advanced coursework is necessary, often resulting in a master’s degree. Because these CCP classes are college level courses, the individual instructing them must maintain the same qualifications as a professor teaching the course on campus.

Methodology

To identify ways in which program participation could be increased, we attempted to determine which program delivery model was preferred among stakeholders. This was done through our surveys sent to traditional public school districts¹⁸ and a review of available participation data. Once the preferred delivery model was identified, we conducted further analyses to determine ways in which districts could work to improve availability of CCP courses.

Analysis

Nearly 50 percent of all CCP courses are taken in a high school setting, with the majority being taught by an approved high school teacher. In addition to being the most prevalent instruction method for CCP, the High School – Approved Secondary Teacher delivery model also results in the best academic performance for students, with individuals completing courses through this method having the highest average GPA for CCP courses and the lowest rate of failed courses compared to other delivery methods. The popularity of high school based instructional models is not unique to CCP. Nationwide, approximately 80 percent of students that participate in dual enrollment courses do so at their own high school.¹⁹

As noted in [Recommendation 3](#), there is significant demand for funding that would allow high school teachers to become credentialed in order to teach CCP courses. This indicates that there is a desire and need at the district level to provide additional opportunities to students to enroll in CCP courses at the high school. However, due to the nature of dual enrollment, individuals that are teaching CCP courses must meet the criteria to teach college level courses. In many cases,

¹⁸ We distributed the survey based off of a comprehensive contact list as provided by ODE. While the contacts were predominantly traditional districts, there were several responses from various other entities. In total, there were responses from 262 public districts, 38 community schools, 13 JVSDs, 3 ESCs, and 2 STEM schools.

¹⁹ <https://nces.ed.gov/pubs2019/2019176.pdf>

this requires additional coursework beyond what is typically necessary to teach other advanced standing courses offered in high school settings.

The primary barrier to increasing the number of CCP courses in a high school setting is the availability of qualified instructors. Districts will need to identify how best to address this barrier. Our analysis identified three options to consider, but districts must review their operational needs to determine the best option based on available resources.

Credentialing Instructors

High school teachers may become credentialed to teach CCP courses through a college or university. In becoming credentialed, the teacher must meet the same criteria that an adjunct professor would need to meet in order to teach college courses on campus. To become credentialed, a high school teacher must possess either a Master’s degree in the discipline or a Master’s degree in any field plus 18 credit hours in the discipline. In addition to the credentialing process, an individual must receive approval as an adjunct instructor by the college or university granting the college credit in order to teach a CCP course.

The desire to assist more high school teachers in obtaining credentialing is apparent by the grant programs administered by ODHE and ODE as discussed in [Recommendation 3](#). The most recent grant, which provided \$3 million in funding, had applications totaling over \$24 million in requested funding. This would indicate that there is significant demand throughout the state for teachers to become credentialed CCP instructors. However, because a subject-specific master’s degree is not necessary to teach high school classes, it may be overly costly and time-consuming for some districts to push employees to obtain credentialing.

Shared Service Models

Due to the varying nature of credentialing cost-effectiveness, sharing credentialed teachers among school districts may be a financially beneficial option for expanding access to the program at a student’s home district. There are several examples across the State of school districts sharing staff and resources, which could serve as model for this option. For example, school treasurers are often time shared among districts.

Leveraging County Educational Service Centers (ESCs) may be an additional option to cost-effectively provide CCP instruction in high schools. According to the Ohio Educational Service Center Association (OESCA), ESCs are, “large-scale service providers offering administrative, academic, fiscal and operational support services to Ohio’s school districts, chartered nonpublic schools, community schools, and STEM schools.”

Historically, ESC’s have provided a great deal of support to school districts for special education services such as occupational, physical, speech therapy, and psychology services. Additionally, ESC’s frequently provide preschool special education programs, as well as gifted and talented programs. While 37 ESC’s across the State assist school districts and higher education institutions in coordinating dual enrollment programs in some capacity, ODE and ODHE were not aware of any instances in which an ESC provides credentialed instructor services. If school

districts, colleges, and universities were to expand partnerships, ESC instructors who are qualified may be able to fill the gap for CCP in high school instruction.

Adjunct Faculty on a High School Campus

A final option for expanding access at high schools would be to increase the use of the High School Campus – College Instructor delivery model. For this delivery model to be more frequently used, school districts would need to partner with colleges and universities and have an adjunct level faculty member that is qualified to teach CCP courses commute to the high school hosting the CCP course.

To expand this method of learning and offer additional support for school districts, colleges and universities could hire or use current adjunct faculty that specifically go into high schools to instruct CCP courses within the region. It should be noted that enrollment at almost all two-year institutions is declining in Ohio, and that the two-year institutions may have faculty that are underutilized which could fill this gap. Expanding CCP instruction to include more adjunct faculty would require school districts to partner with local colleges and universities. The impact of doing this would be an increase in access to high school instruction while also maintaining the high quality CCP course instruction expectation.

Conclusion

Districts should work to increase the number and type of CCP courses offered in a high school setting in order to improve overall program participation. In doing so, districts should consider the needs of their community when determining how best to improve access to CCP. Increasing the number of classes at the high school through efforts to increase the credentialing of high school instructors, leveraging shared service opportunities, or increasing partnerships among secondary schools and institutions of higher education to provide more adjunct faculty at high schools would allow more students to participate in the program and take advantage of cost savings opportunities related to college tuition.

Recommendation 3: Implement Additional Grant Requirements

The General Assembly has allocated a total of \$8 million in grant funding for the purpose of increasing the number of CCP credentialed high school teachers which was jointly administered by ODE and ODHE. The most recent grants were awarded in FY 2020 and provided funding through FY 2023. Entities were awarded funds to be used towards graduate coursework necessary to credential teachers to instruct CCP courses.²⁰ Grantees received funding through a reimbursement of expenses once claims were verified by ODE. However, the law did not grant ODE the authority to require that individuals complete the credentialing process. This means that grant funding may not be maximized as individuals may ultimately choose to not seek out credentialing. If future grants are awarded, ODE and ODHE should work with the General Assembly to require the attainment of CCP instructor credentials as a condition of the award, along with a required service period. Doing so would help to ensure that the grant funds are fully maximized for their intended purpose of increasing the number of CCP credentialed teachers. In turn, this could result in increased program participation.

Impact

Under current grant practices, there is risk that some portion of the grant funds may be awarded to teachers for coursework completed that does not result in the attainment of CCP credentials. If the use of grant funds is not fully maximized, the number of credentialed teachers available to meet demand may be reduced, potentially limiting access to the program. Requiring teachers to become fully CCP credentialed will ensure that state issued grant funds will be properly used.

Background

In FY 2016 and FY 2020, ODE and ODHE jointly administered a total of \$8 million in grants to secondary schools, colleges, and universities for the purpose of credentialing high school teachers to instruct CCP courses. In FY 2016, there was approximately \$15.2 million worth of grant applications with approximately \$5 million being awarded. In FY 2020, there was approximately \$24.3 million worth of grant applications with \$3 million being awarded.

All school districts, colleges, and universities were eligible to apply, but priority was given to cohorts that included economically disadvantaged high schools where there was a limited or non-existent credentialed teacher pool to instruct CCP courses. The grant proposals were scored according to nine criteria to determine where grant funding would be awarded. The grant criteria included:

²⁰ Individuals were not awarded grants. The list of eligible entities included public and nonpublic schools, educational service centers, nonprofits, and colleges and universities.

- Student Access;
- Collaboration;
- Supporting Students;
- Communication or Recruitment Plan;
- Sustainability;
- Likelihood of Success;
- Retention;
- Innovation; and
- Budget.

Methodology

AOS obtained information regarding the management of the teacher credentialing grant from ODHE and ODE. AOS then compared the current state of client practices to industry best practices as identified by the Government Finance Officers Association (GFOA) and the Federal grants program management office.

Analysis

According to ODE, the teacher credentialing grant funds are disbursed on a reimbursement basis. Grant awardees pay for the cost of coursework upfront, and the awardee submits a request for reimbursement after coursework is completed. While ODE has a process for verifying the appropriateness of reimbursement claims and ensure graduate coursework is being completed, funds are reimbursed for coursework taken, regardless of whether the teacher becomes credentialed.

Under the current rules of the teacher credentialing grant, there is no requirement that individuals obtain a CCP credential. Because of this, there is risk that some portion of the grant funds may be spent on coursework that does not result in the attainment of CCP credentials. As of March 2022, approximately 30 percent of grant awardees, or 113 teachers, had not yet earned CCP credentials.²¹

In *Performance Measures* (March, 2018), the GFOA recommends that, “all organizations identify, track, and communicate performance measures to monitor financial and budgetary status, service delivery, program outcomes, and community conditions”. *Understanding the Reporting and Oversight Process* (grants.gov) indicates the need for progress reports as an oversight mechanism used for federal grants. “Grant recipients submit regular reports

²¹ While 30 percent of awardees not reaching the CCP credential threshold is significant, award recipients were given until June of 2023 to complete their credentialing work due to the ongoing COVID-19 pandemic.

documenting a project throughout its lifespan. These reports may include both expense-related data and quantitative information about the project's impact.”

Service Requirement

Programs such as the Public Service Loan Forgiveness Program (PLSF) provide incentives to individuals that work in certain public sector or non-profit fields. Specifically, PLSF will forgive federal student loans for individuals that work for qualifying employers for a period of time. Similarly, private sector companies often provide employees educational opportunities with the requirement that they remain at the company for a period of time after taking part in any such opportunity. ODE and ODHE should consider incorporating such a requirement into future grant funding. Doing so will help to ensure the state’s investment in educators to provide CCP courses to students.

Conclusion

ODHE and ODE should work with the General Assembly to require the attainment of CCP instructor credentials as a condition of future grant programs. Doing so would help to ensure that the grant funds are fully maximized for their intended purpose of increasing the number of CCP credentialed teachers. In turn, having more credentialed teachers could result in increased access to the program.

Recommendation 4: Minimize Barriers to Participation Among Underserved Student Populations

Traditionally underserved students, particularly those that are low-income or minority, participate in the CCP program at a lower rate than their peers. The reduced rate of participation is due, in part, to barriers that these populations face that impact the ability to attend courses online or on campus. To improve program participation, ODE and ODHE should work to minimize barriers to participation such as limited access to support services and high speed internet for these students. In doing so, the Departments can improve CCP participation rates for traditionally underserved students, allowing more families to take advantage of program benefits, including exposure to advanced educational opportunities and cost savings associated with pursuing post-secondary education. As additional data is collected and incorporated into long-term strategic goals, ODHE and ODE can work with colleges and universities and districts to design and expand targeted initiatives to further address barriers and develop a plan to increase participation.

“Some districts with large underserved student populations have teachers that are already overworked and don’t have incentives to take on the load of teaching CCP course. Students in these districts face many barriers if they want to come to campus to take courses through CCP.”

- College Administrator

Impact

Multiple studies have been conducted that suggest low-income and minority students benefit from participation in dual enrollment programs.^{22,23,24} The elimination of barriers to participation in courses offered on-campus and online will allow districts to assist more students in taking advantage of the benefits of CCP.

Background

At both a state and national level, minority and economically disadvantaged student groups have continually been under-represented in dual enrollment programs. Gaps in participation rates may reflect lack of access to these opportunities at schools predominately attended by students of color, as well as, in some states, barriers posed by tuition, fees, transportation issues, eligibility

²² An, B.P. (2013). The Impact of Dual Enrollment on College Degree Attainment: Do Low-SES Students Benefit? *Educational Evaluation and Policy Analysis*, 35, 57–75.

²³ Taylor, J. L. (2015). Accelerating pathways to college. *Community College Review*, 43(4), 355– 379.

²⁴ *Dual Credit & Student Success: The Effect of High School Dual Credit on Educational Outcomes at Kentucky Public Universities* (2020). The Kentucky Council on Postsecondary Education.

policies, and lack of information about these programs. Minority and economically disadvantaged student groups are also persistently underrepresented in CCP participation.

As research and experience has shown, students of color and students from low-income families can and do succeed when given the opportunity to engage in college-level work in high school. Strong peer-reviewed research demonstrates that participation in college in high school programs improves college transitions and persistence. Collectively, these studies show positive, statistically significant effects when high school students complete college courses, even after controlling for prior academic achievement and demographic variables. In fact, such programs are most effective in improving college access and success when they focus on students who are low-income, underrepresented in higher education, or at risk of not completing postsecondary education.

Disadvantaged Student Data in the CCP Annual Report

Throughout the life of the CCP program, minority and economically disadvantaged student groups have experienced disproportionately lower participation rates. Within the 2021 CCP Annual Report, ODE provides an overview of CCP participation rates by race and ethnicity in comparison to high school public student population percentages from AY 2016 through AY 2021. The data indicates that, based on their relative proportion of the total student population, non-white student groups have a significantly lower participation rate compared to white students. This dynamic does not appear to have improved significantly from year to year. The persistent participation gap is particularly evident for African American and Hispanic students.

The annual report also identifies the percentage of economically disadvantaged students participating in CCP. In Ohio, nearly 50 percent of students are considered economically disadvantaged based on the definitions used by ODE, but only 17 percent of students that participated in CCP in AY 2021 were identified as economically disadvantaged. This is a significantly lower percentage compared to the total student population. Similar to the stagnant participation rates among non-white student groups, participation among economically disadvantaged students has not significantly improved from year to year.

Methodology

Using our regression analysis, we identified variables that impact overall CCP participation rates at the district level and were considered statistically significant. We then identified ways in which actions could be taken to address those variables that were statistically significant and therefore represented potential barriers to participation. Further, through our survey of participating school district officials and interviews with colleges and universities, we catalogued what administrators felt were significant barriers. We also conducted a review of existing programs to determine if there were any best practices to promote program participation among minority and economically disadvantaged students.

Analysis

Through numerous interviews with ODHE, ODE, colleges, universities, and school districts, there were consistent barriers to student participation in CCP identified. These barriers may exist due to systemic issues or they may be recognized as a barrier on a national scale for dual enrollment programs across the country. The barriers identified and analyzed include:

- **Student Support Services:** This includes transportation, meal services, and student counseling.
- **IT Services:** This includes students that may not have access to high-speed internet which is a requirement for Online Course Delivery.
- **Eligibility Requirements:** This includes the use of Innovative Programs between school districts and college or university partners.

Support Services

“Support services” is an all-encompassing term used to describe equity programs that are offered to disadvantaged students. These services include transportation services, meal services, counseling services, academic services, health services, and special education services. While support services are offered by the school district through state and federal funding support, these services are not provided for students while they are taking CCP courses on a College campus. Not offering the additional support services to CCP students creates barriers and limits students' abilities to be successful in the program. The following is an analysis of Meal Service, Transportation Service, and Counseling Services as it relates to the impact on CCP students.

Meal Service

In interviews with Shawnee State University and Washington State Community College, access to meals was indicated as a limiting factor in CCP participation. In many areas, low income students rely on school breakfast and lunch programs for the majority of their food needs. In these higher poverty areas, students may be faced with the decision of attending a college course on campus or eating lunch. In these cases it would be difficult for students to turn down nutritional needs in order to attend the college class on-campus.

“Some students have to decide if they are going to eat. The high school provides their only meal of the day, so they may not come to us for CCP because they need a meal.”

- College Administrator

Transportation Service

In many parts of Ohio, access to public transportation is extremely limited. If a student does not have their own transportation, it may not be possible to travel to a college campus to attend classes. As discussed in [Recommendation 6](#), *Unlocking Potential: A State Policy Roadmap for Equity and Quality in College in High School Programs* (The College in High School Alliance and Level Up, 2019) provides policy recommendations for dual enrollment programs.

Transportation support is listed as one of the necessary steps dual enrollment programs need to provide, specifically the state should require that transportation supports be provided to students that need them to access courses.

Counseling Services

In the secondary school setting, the current dynamic of the CCP program places the majority of the coordination burden on school counselors. According to the school district survey responses, 68.7 percent of school districts indicated that school counselors are the primary coordinator for CCP and students. ORC § 3365.04(B) spells out certain roles and responsibilities regarding counseling services for students as they relate to the program. It states that public and participating nonpublic secondary schools must provide counseling services to students in 6th through 11th grade and to their parents before the students participate in the program under this chapter to ensure that students and parents are fully aware of the possible consequences and benefits of participation. According to that same code, counseling information shall include many items, including program eligibility, scheduling, consequences of failing or not completing a course, financial arrangements for tuition, textbooks, and fees, and many more.

Our analysis indicated that in AY 2019, Ohio had 409 students for every counselor. This is 159 students more per counselor than the American School Counselor Association’s (ASCA) recommended 250 students per counselor.²⁵ The limited number of school counselors relative to the ASCA benchmark, and in relation to the burden placed on that position, may contribute to the perpetual under-representation of minority and economically disadvantaged students in the CCP program. Ensuring that counselor to student ratios are as low as possible will help minimize the student counselor barriers inherently present in the CCP program. Alternatively, increasing the CCP program contact points for students may help alleviate the burden that is placed on most counselors who coordinate the CCP program for students.

IT Services

An identified barrier for CCP enrollment included IT services and high-speed internet access. According to the Annual Report, the online delivery method is the second least used delivery method. Two factors may affect the degree of online utilization within CCP, a lack of interest by school districts to support the online delivery method and limited high-speed internet access for students.

“In some cases the availability of technology is a challenge. We do have online classes that CCP kids participate in, if they don’t have internet at their homes that could be a barrier.”

- College Administrator

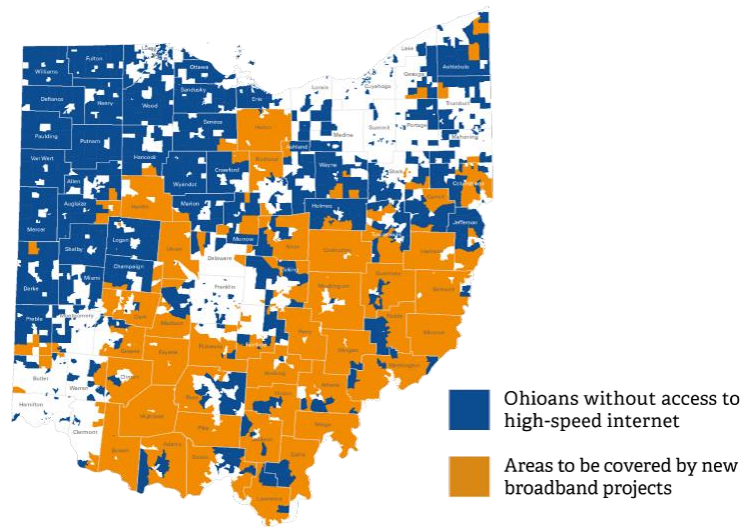
²⁵ School Counselor Roles and Ratios (ASCA, 2022)

The online delivery method is the least favored among K-12 survey respondents. Only 27 respondents, or 8.9 percent, listed online as the most preferred modality.²⁶

Additionally, some parts of Ohio lack reliable high speed internet access. According to the Federal Communications Commission (FCC), high speed broadband internet is defined as 25 Mbps download and 3 Mbps upload speeds. The map below indicates internet speeds across the state. Outside of the three largest cities in the state- Cincinnati, Columbus, and Cleveland- high-speed internet was not readily available as of August 2021, according to Broadband Ohio.

Ohio Residential Broadband Grant Program

The State of Ohio is investing \$250 million into broadband expansion as approximately 1 million Ohioans live without broadband internet access. House Bill 2 of the 134th General Assembly established The Ohio Residential Broadband Grant Program²⁷. Funded as part of Ohio's FY 2023 operating budget, the program will provide \$250 million in grants to internet service providers for the construction of broadband projects that improve high-speed internet access in unserved and underserved areas of Ohio and is to be administered by BroadbandOhio. Eligible projects should provide service access of at least 25 Mbps download and 3 Mbps upload to residences in areas that do not have a provider that can supply that speed.



In order to identify counties which could be targeted with these funds to positively impact CCP participation in the Online delivery method, we gathered county broadband data and identified the bottom quarter of counties that had 75 percent or less of households with high-speed broadband access. All of the identified counties are set to receive some portion of the grant; eight counties identified have more proposed service area addresses than the statewide county average of 6,105. When normalized on a per household basis, five counties have a lower number of proposed service area addresses than the statewide county average of 0.25, which could indicate

²⁶ One potential reason the online delivery method is not preferred more may be due to cost, as tuition for this delivery method is based on the highest default ceiling amount. [Recommendation 9](#) goes into detail about delivery method costs. This means that school districts are paying more tuition to colleges and universities even though students are not accessing the college and university campuses and often using the school districts infrastructure for the online courses.

²⁷ Signed into law in May of 2021

that these counties are set to receive a proportionately lower share of grant resources relative to the rest of the state. Increasing the high-speed internet access across the state may help minimize the barrier associated with the online course delivery method.

Eligibility Requirements - Innovative Programs

An Innovative Program is a program designed to allow underrepresented students to earn CCP credits through alternative programming that is specifically designed by colleges and universities. These programs allow for colleges, universities, and school districts to partner and design specific curriculum. Innovative Programs is a codified initiative that allows school districts, colleges, and universities to apply for an eligibility waiver for the underrepresented CCP students within the program.

According to our interviews with colleges and universities, most of the twenty interviewed institutions of higher education stated they have no initiatives that specifically focused on increasing CCP participation of minority or less affluent students. While there were a few colleges that saw an increase in CCP participation for these students either through purposeful and focused intervention or inadvertently through their existing programs, only three institutions were identified as having specific initiatives which populations can be targeted for increased CCP participation. Two notable examples are through Marion Technical College and the University of Cincinnati.

Marion Technical College has a program called Graduate Pathways to Success (GPS), which is a subset of CCP. This program works in partnership with Marion City Schools, a district where all students receive a free school lunch. It works by letting students take classes during freshman year, then an increasing number of courses as they continue their education. The idea is that students will have a certificate or associate degree when they graduate from high school. Marion Technical College officials stated they view the program as successful, and they have worked to potentially expand this program to other institutions including North Central State College (NCSC).

The University of Cincinnati (UC) has been active in using Innovative Programs and has expanded offerings in early IT programs. It also has a new manufacturing technology program at their Grant Career Center in Clermont that targets socioeconomically disadvantaged students in which participants would only need one additional year to get a certification. Finally, it is planning a future initiative related to engineering.

While specific initiatives aimed at increasing participation in CCP among underrepresented student groups are not in widespread use, there are some institutions of higher education with programs in place which could serve as examples for other institutions in this effort. Colleges and universities should develop targeted initiatives and seek opportunities to expand the use of Innovative Programs which would continue to reduce barriers in CCP.

Conclusion

Student support services, IT services, and eligibility requirements were the three most identified barriers for CCP participation. ODE and ODHE should focus on coordinating initiatives with school districts to minimize barriers to CCP participation and incorporate specific goals related to these barriers in its strategic planning efforts (see [Recommendation 6](#)). Participation in CCP would likely increase among disadvantaged students if they were provided assistance in these areas by the impacted school districts.

Recommendation 5: Ensure there is a Robust and Uniform Orientation Process for CCP Students.

For those students who choose to attend CCP courses at a college or university, there is little to no program specific orientation available to them. While colleges and universities have orientation programs for traditional students, new CCP students may not benefit from those to the same degree as orientations specifically tailored to them. ODE and ODHE should work with colleges and universities to ensure there is a robust and uniform orientation program for CCP participants. These orientation programs should be designed in a way that the comfort level of CPP participants is increased as they navigate college course and so that they are prepared for the rigor and expectations of college courses.

“Orientation was very transactional and not particularly helpful, I would have liked to speak to students who had participated in the program or taken a tour of campus before I started classes.”

- Current CCP Student

Impact

By having ODE and ODHE mutually develop a standard orientation process for colleges and universities, new CCP students will gain a more thorough understanding of the rigor and expectations involved in the advanced courses that CCP is offering, as well as the resources available to them such as library and tutoring services. This could have a positive financial impact by reducing the frequency of CCP course failures, which cost over \$2 million in FY 2021.²⁸

Background

Navigating the transition from high school to college can be daunting and, in addition to academic preparedness, requires social and emotional maturity. Student preparedness can be a major determinate of success in college level courses.

Preparedness consists of many aspects including possessing a solid understanding of the expectations to which one will be held. Orientation programs for incoming students can help prepare them by outlining the different expectations of college coursework as compared to high school work, including managing self-paced work, communication with instructors, and study skills. Students participating in CCP may have different needs than traditional students entering college and could be better served by having a robust orientation tailored to their specific needs.

²⁸ At the discretion of each district, when a student fails a course, they may be responsible for paying the district the actual tuition amount that was deducted on their behalf. If the rate was negotiated, the student would pay back the district according to that rate, not the default schedule.

Students, their families, and individual colleges and universities all have a stake in CCP coursework being completed successfully.

Methodology

Based on the CCP Hours per Student (7th through 12th grade) metric, we created a sample of institutions of higher education which could be used to conduct one-on-one interviews based on relative CCP utilization, and grouped them into High, Medium, and Low utilization categories. This method was used to ensure we would gather feedback from institutions with a variety of experiences participating in CCP. By selecting colleges and universities from each utilization group, we made certain views from high, medium, and low utilizers were heard. Interviews were scheduled with institutions from the sample which were willing to participate. The feedback collected during the interview was then coded for analytical purposes and analyzed on a question by question basis.

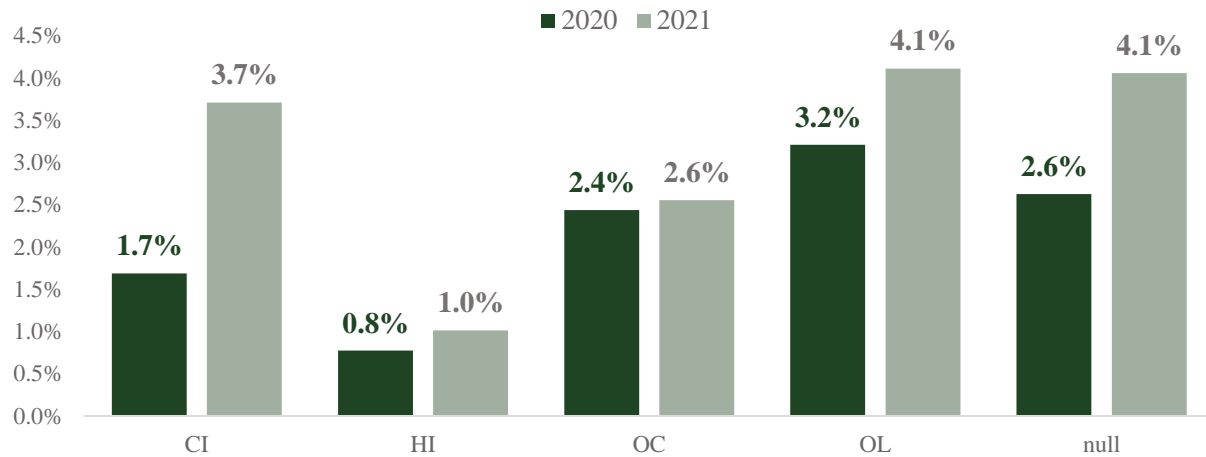
Analysis

Being prepared for college coursework can be a determining factor on how successful a student is in college. One aspect of preparedness for CCP is demonstrating academic readiness at the appropriate level for the course and being eligible for the advanced coursework. Another aspect of preparedness is being mature enough to manage the different and often challenging expectations of college coursework. Through interviews with multiple colleges and universities, OPT learned that few have concerns regarding academic preparedness, but many have concerns about the maturity of the CCP students they enroll. In total, twenty-five percent of interviewees mentioned maturity for CCP level courses as their main concern. Colleges and universities generally cited concerns about the maturity level needed for the topic areas covered in CCP courses, a lack of communication etiquette with professors, struggles with learning software and management systems, and issues with time management. One of the colleges or universities noted that time management was of particular concern for at-risk students.

Not being prepared, whether due to maturity or academic ability, has potentially significant financial consequences. ORC § 3365.09 states that if a student does not pass a CCP course, that student may be responsible for the cost of the course.²⁹ While academic eligibility requirements restrict many students who are unprepared, getting students ready and ensuring they have a strong understanding of the increased responsibility required to be successful in college coursework is up to the student, school district, college, or university. The following chart and table show course failure rates by delivery method, as well as the total number of failed course credit hours in the CCP program in FY 2021 with the corresponding potential cost to students and their families, respectively.

²⁹ Under this statute, unless the participant was expelled, a school district may not seek reimbursement if the student is identified as economically disadvantaged.

Distribution of CCP Course Failures by Delivery Method



Source: ODHE

Cost of Failed CCP Courses by Delivery Method, FY 2021

Delivery Type	Credit Hours	Cost of Failed Courses
College Instructor	1,591	\$131,774.58
High School Instructor	5,511.5	\$116,634.06
On-Campus Learning	2,350	\$389,277.50
Online Learning	10,635	\$1,761,687.75

Source: ODHE

Note: Individuals that do not obtain a passing grade in a course taken through CCP may be responsible for reimbursing the funds paid to the college on their behalf.

We see in the chart above that the Online delivery method had the highest failure rates, and the high school instructor delivery method had the lowest. The charge-back value of those course failures follows accordingly.³⁰

Of the CCP students graduating high school in cohorts between 2017 and 2021, 17,553 failed or did not pass at least one course. Of the students that failed a course, 67.5 percent of them did not take a CCP course again during their high school career, which underscores the vast significance of course failures to the program. The long-term financial impact of course failures to

³⁰ Due to the discretion each district has in requiring reimbursement for failed courses, and the law exempting economically disadvantaged students from reimbursement, the amount of cost that participant families were required to pay back to districts is unknown.

participants and their families is likely much higher than the quantified amounts shown in the table.

One contributing factor to course failures could be a systemic lack of emphasis on post-secondary orientation efforts for incoming CCP students by colleges and universities. However, some colleges and universities offer or require a CCP orientation program to help prepare students for the different expectations of college coursework, including managing self-paced work, communication with instructors, and study skills. For example:

- Central Ohio Technical College (COTC) requires CCP students to take an orientation program to better prepare them for success in college courses. COTC developed an online orientation through their learning management system. It is a self-paced online program. Students retain access to the course through the learning management system, allowing them to refer to the information as needed.
- Lorain County Community College (LCCC) makes a recorded orientation available for all new CCP students. The presentation is available online to the public and includes advising team contact information, an explanation of how high school and college differ, instructions on how to set up student accounts, and additional resources and support, including e-learning and library resources. LCCC also makes a two-page student resource guide available with information about where to access resource materials for these areas.

While we consider these examples to be notable practices, programs such as these are ultimately up to the colleges, universities, or school districts themselves to implement. Without a robust and uniform CCP course orientation for all Ohio students that participate in CCP, many students across the state may be left underprepared for more challenging CCP coursework, potentially costing students and their families thousands of dollars.

Conclusion

Because there is a difference in expectations for students pursuing college coursework compared to high school, high school students may find themselves initially lacking an adequate understanding of what is required to be successful in a college course. This could result in a failed course attempt and financial burden for the student. Some institutions have seen success with implementing an orientation program. Programs like COTC's and LCCC's could serve as examples of a model which could be implemented at all colleges and universities. Developing orientation programs that are specifically tailored to CCP could limit the amount of course failures, thereby increasing the confidence of first-time participants and leading to greater long-term success for students.

Program Operations

Proper planning, goal formulation, data-driven decision-making, and oversight are tenets of long-term success for any program or organization. The College Credit Plus program is no exception. While the program has seen major success in participation growth and the resulting savings to Ohio families since the dissolution of its precursor program, PSEOP, leveraging quality data and strategically planning will be critical for sustained growth and high performance into the future. Prioritizing efforts to improve the program could place Ohio in a position to become the national leader of dual enrollment.

As more and more Ohioans recognize the benefits of dual enrollment, and as participation grows, oversight functions will become increasingly important for managing program expansion. Clarifying oversight roles and responsibilities will have positive effects on the program through enhanced accountability and transparency.

Background

CCP is a statutorily driven program with codified requirements under the Ohio Revised Code. The program is also guided by administrative rules as promulgated under the Ohio Administrative Code. The program is formally established under ORC Chapter 3365. ORC § 3365.15 outlines the requirements for both the Chancellor of Higher Education (the Chancellor), the Superintendent of Public Instruction (the Superintendent), and the data collecting and reporting requirements for the program. ORC § 3365.07 codifies the default tuition rates that colleges and universities will receive for CCP students along with the process for how colleges and universities will receive their payments. OAC, however, gives guidelines for the departments, school districts, colleges, and universities as they relate to CCP and the ORC requirements. OAC § 3333-1-65.5 details how districts, colleges, and universities must comply with data collection standards that are set forth in ORC § 3365.04(G) and § 3365.05(H).

What We Looked At

In recognizing the statutorily driven nature of the program and the involvement of multiple stakeholders in its deployment, we focused on identifying improvements to the operations and oversight functions of the program. To perform our analysis, we interviewed representatives of each department, as well as twenty individual colleges and universities, and reviewed the program’s relevant code and rules as set forth in the ORC and OAC. We then reviewed the program’s data collection and utilization efforts and compared them to those of other states with similar dual enrollment programs. Finally, we reviewed the program’s funding model in an effort to assess the appropriateness of the current fee structure.

Why We Looked At This

With millions of dollars in savings at stake, CCP is a highly impactful program for Ohioans, affecting school districts, institutions of higher education, and tens of thousands of families each year. Due to its financial implications for students and Ohioans, the multiple stakeholders involved in carrying it out, and the volume and quality of data needed for transparency, we looked at the program's operations to determine if any changes could be made that would result in improvements to the overall management of the program.

What We Found

While CCP is largely successful in its current form, we found that the program would likely benefit from a focus on strategic planning, oversight responsibilities, and data management, as well as a re-evaluation of its funding mechanisms.

We found that the program lacks formal, strategic goals and objectives. Although the departments compile a detailed annual report that presents the program's outputs, there are no defined measurements relative to program success. The development of formal, future-oriented forward-facing program goals and performance metrics would solidify commitment to aim program improvements toward established benchmarks. We also found that the program has an advisory committee that is established under ORC § 3365.15(D) that assists in the development of performance metrics and the monitoring of the program's progress, but the ORC does not identify who is responsible for overall program oversight. Without a formal goals and clearly defined oversight roles, stakeholders may rely on doing the legally required minimum.

Large amounts of data are collected regarding the program and the students that use CCP. This data collection, along with requiring an annual report of the data, is mandated in ORC as the responsibility of both the Chancellor and the Superintendent. While collecting this data has been useful for the transparency of the program to Ohioans, we found that the program could be doing more with data analysis, evaluation, and collection. There were several instances where data collection and reporting could be enhanced to offer an even better picture for the program. We found that data improvements would allow for more sophisticated analyses that could be leveraged to establish goals, better direct resources, and measure performance.

CCP is funded through state tax dollars and is generally cost-free to students, which makes participation in the program significantly valuable to Ohio families. State funds are deducted from school districts of participating students and transferred to colleges and universities to cover the cost of tuition. These transfers are most commonly done in accordance with a default rate schedule as established under law. We found that because the default rates are based on a per-pupil funding amount no longer in existence, they may no longer be reflective of the current costs to educate CCP participants. Due to the high prevalence of default rate usage in the program, it is important that the cost associated with course delivery stay current. We also found that while rate schedule adjustments would likely mean increased revenue loss to school districts,

CCP deductions currently make up less than one percent of state revenue for each district, on average.

These findings ultimately led us to identifying five recommendations and an issue for further study. Addressing the current operational shortcomings will help to increase the success of the program and continue to save Ohioans hundreds of millions of dollars in college expenses.

- **Recommendation 6:** The CCP program does not have distinct, progressive, measurable program goals supported by routine data analysis and evaluation. While ODHE and ODE both collect significant amounts of data related to the CCP program and student participation, this information is focused on outputs, such as the number of courses taken in a year, and not outcomes, such as reduction in time spent pursuing a degree or certificate program. As appropriate program oversight is established and data collection is enhanced to include outcome data, formal goals and metrics should be developed to ensure desired programmatic outcomes are being achieved and to identify areas for improvement.
- **Recommendation 7:** The laws governing CCP establish specific duties for ODHE and ODE related to the distribution of funds and data collection and reporting. They further require the establishment of an advisory committee to assist in the development of performance metrics and monitoring of the program’s progress. However, the laws do not identify who is responsible for overall program oversight. ODHE, ODE, and the CCP advisory committee should work with the General Assembly to clarify and strengthen the management, oversight, and compliance monitoring functions necessary to allow CCP to reach its potential. In doing so, they should consider what structures and resources will be necessary to continue to monitor and improve the program in order to provide strategic direction that will support the evolving needs of Ohio’s students, economy, and workforce.
- **Recommendation 8:** There is a significant amount of data collected by both ODHE and ODE regarding the CCP program, and the content and quality of this data exceeds that of most peer state dual enrollment programs. This data is largely related to program participation while students are in high school and is used to comply with annual reporting requirements that provide historic detail on the outputs of the program. While the data collection practices used by ODHE and ODE are generally good in comparison to peer states, there is room for improvement. In some cases, there are data fields that are incomplete, particularly as it relates to demographic information, and data that is inconsistent in nature, such as identifying the type of courses being taken. This type of information is critical in identifying where program improvements could be made. Both ODHE and ODE should work to ensure that the CCP data collected is both complete and consistent. This information can then be leveraged to identify and work towards strategic programmatic goals.

- **Recommendation 9:** When a student takes college courses through the CCP program, ODE directs payment to the college or university based on a default rate that is specified in ORC. The default rate varies based on the delivery model and contains both a maximum and minimum charge. The current formula that establishes the default rate uses a set dollar amount identified in ORC as a baseline and has not been significantly updated since the program first began. The General Assembly should review the default payment rates to ensure that they appropriately reflect the current cost to IHE's to provide CCP courses to high school students. In doing so, the General Assembly should consider how future changes to the foundation funding model might impact the program's default fee rates.
- **Recommendation 10:** In addition to CCP participation fees, school districts are also required by law to cover the costs of textbooks, which can be costly. One way to reduce the impact of purchasing textbooks is through the use of open educational resources (OER), which are freely accessible, openly licensed text, media and digital assets including college textbooks, online supplements, etc. While efforts have been made to expand opportunities for the use of open educational resources in the state, their current utilization appears to be limited. The General Assembly should require ODE and ODHE promote opportunities to increase the use of OER materials among CCP participants and could consider splitting the cost of educational materials between colleges and universities and high schools. A strategic effort should be made to align existing and available OER materials with CCP courses offered among the State's various colleges and universities. Collaborative efforts should be aimed toward gaining wider acceptance and adoption of OER materials among Ohio's colleges and universities. Increased adoption of OER textbooks would reduce costs to school districts, which could, in turn, encourage further participation in the program.
- **Issue for Further Study 1:** Public colleges and universities receive funding from the state through the State Share of Instruction (SSI) for the education of Ohioans. This funding is based on a complex formula that takes into account student enrollment and academic outcomes. Each public college and university reports detailed cost information to ODHE within the Higher Education Information (HEI) system, and that data serves as the basis for the SSI calculations. However, we found that CCP students are counted the same as traditional students, regardless of CCP delivery type. This means that a CCP student utilizing the high school instruction delivery method could generate the same SSI value as a traditional on-campus student. As a result, the SSI funding received for the education of CCP students may be outsized relative to the actual costs of that education. ODE and ODHE should work with the General Assembly to re-evaluate the appropriateness of the manner in which CCP participation is factored into SSI funding.

Recommendation 6: Implement Formal Goals, Objectives and Strategies for College Credit Plus

The CCP program does not have distinct, progressive, measurable program goals supported by routine data analysis and evaluation. While ODHE and ODE both collect significant amounts of data related to the CCP program and student participation, this information is focused on outputs, such as the number of courses taken in a year, and not outcomes, such as reduction in time spent pursuing a degree or certificate program. As appropriate program oversight is established and data collection is enhanced to include outcome data, formal goals and metrics should be developed to ensure desired programmatic outcomes are being achieved and to identify areas for improvement.

Impact

Formalized program goals and the development of metrics would allow for more meaningful evaluation of program success. Data communicated about the program would be placed in the context of formalized performance metrics and benchmarks. Goals and objectives would solidify commitment to program improvement, and put into focus how best to direct resources of the program to align with and support broader initiatives in the state, such as Ohio’s workforce development goals. Lastly, defined goals could contribute to future participation growth, particularly among underrepresented student groups.

Background

CCP was designed and established in an effort to address many of the issues that were identified in PSEOP that prevented widespread participation. The legislation which governs the program provides detailed guidance on how it should function operationally, such as how payments are to be provided to colleges and universities, how the program should be promoted at school districts, and the counseling support that should be provided to program eligible students and families. The legislation does not, however, provide any context or guidance as to how the program should develop over time or what measures should be used to determine its relative success. As required by ORC § 3365.15, ODHE and ODE publish an annual report. In addition to the information required by the statute, the report also includes information regarding the program such as number of courses attempted and approximate cost savings; but the report does not provide any information that can be used to determine the effectiveness of the program in relation to any benchmark.

Methodology

We interviewed representatives from both ODHE and ODE, as well as colleges and universities from our pool of interviewees, to understand what, if any, strategic or long-term planning occurs in relation to CCP. This would include both formal and informal identification and documentation of objectives or goals related to the program, such as number of student

Efficient • Effective • Transparent

participants, credit hours earned, or degrees or certificates completed. We then compared strategic planning efforts to best practices.

Analysis

To understand the initial objectives of CCP, the Ohio Board of Regents' *Recommendations for Ohio's Dual Credit Program* report was reviewed. This report defined the initial intentions for the CCP program along with the processes that unfolded during the creation of CCP. This report stated that while there was not universal agreement on every issue, there was agreement among stakeholders that Ohio needs to produce more college and career-ready individuals along with maintaining a highly functioning system of dual credit for school districts. Along with this overarching idea, a few other principles were used in crafting the dual enrollment program:

- Students must always be the primary focus and beneficiary of education policy.
- It is the responsibility of secondary schools, colleges, and universities to work collaboratively and think innovatively in order to advance the achievement and success of Ohio's students.
- CCP should be structured to ensure open access to all college-ready students with minimal need for contributing student resources.
- The program must encourage innovation to meet the changing needs of students and the state.
- Increasing the participation rates of underrepresented and low-income student populations in programs that result in higher graduation rates.
- 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.

IHE Strategic Planning

While not specific to the overarching management of CCP, we also interviewed IHE's, which were selected based on CCP utilization, to determine the existence of CCP strategic planning amongst post-secondary institutions.

The development of formal program goals and objectives is not a function that is necessarily reserved for ODE and ODHE. Nothing in code or rule precludes individual IHEs from developing their own unique set of CCP goals and objectives. We conducted interviews with twenty IHEs to analyze their goals for CCP. Overall, the interviews indicated that the utilization of goals and performance metrics may be limited. The results of the IHE interviews as they related to questions about CCP goals and metrics were as follows:

- Seven IHEs responded clearly that they did not have any formal goals or objectives set for CCP.
- One responded that they were in the process of creating goals.
- Eight responded that they track some level of metrics for CCP.
- Edison State Community College and Northwest State Community College indicated they have formal plans in place which are currently tracked.

While CCP was created with specific goals in mind, through our interviews we found that there are currently no long-term strategic plans or goals in place for the program. This creates several difficulties related to program evaluation. Without first knowing what the long-term expectations are for the program, it is difficult to strategically plan and advocate for necessary policy changes

and to evaluate program performance. This can result in missed opportunities to align resources of the program to support workforce development goals.

The Society for College and University Planning (SCUP) is an organization made up of post-secondary professionals that specialize in higher education planning. SCUP provides a strong example of the components of strategic planning that states planning is a necessary activity and that it should be linked to a program’s mission, vision, and values. Further, it should include:

- What your institution wants to achieve (goals, strategic issues, objectives, etc.);
- How your institution will achieve its goals (strategies, tactics, actions, etc.); and,
- How your institution will measure success (metrics, KPIs).

As goals and objectives for CCP are created and tracked, an opportunity for synergy in statewide goals presents itself. In *Unlocking Potential* (2019), The College in High School Alliance and Level UP advocate that states should build dual enrollment programs into other workforce development programs.

This idea of creating college and career ready individuals through dual enrollment is in alignment with the State’s workforce development goals. The Governor’s Office of Workforce Transformation (OWT) sets the strategy for workforce development in Ohio. OWT coordinates with state agencies that impact the workforce. The mission is to “connect Ohio’s business, training, and education communities to build a dynamically skilled, productive, and purposeful workforce to create greater opportunity for every Ohioan.” OWT periodically monitors what jobs are in the greatest demand. The harnessing of available workforce development data to inform aspects of CCP could promote certain in-demand jobs in Ohio to meet the workforce needs of the state and provide additional gainful employment options for Ohioans.

Conclusion

Annual reports on CCP only communicate output data, which is not clearly linked to goals and objectives. Additionally, results from interviews indicates there may be a general lack of established goals and objectives for CCP amongst colleges and universities across the state. Best practices call for established goals and objectives to be in place to help determine where programs are successful and where they can be improved. The lack of goals and objectives for CCP results in increased difficulty in evaluating the impact of the program and communicating any potential successes or opportunities for improvement, as well as creating any synergies with other state goals or initiatives. ODHE and ODE, as well as individual colleges and universities, should develop and implement formal strategic goals and objectives for CCP. Doing so would increase the utility of the program’s available data, help the agencies to better direct the program to ensure it is continually aligned with its core purpose, and ultimately contribute to program participation and continuous improvement.

Recommendation 7: Clarify and Enhance the Level of Program Oversight Responsibilities

The laws governing CCP establish specific duties for ODHE and ODE related to the distribution of funds and data collection and reporting. They further require the establishment of an advisory committee to assist in the development of performance metrics and monitoring of the program's progress. However, the laws do not identify who is responsible for overall program oversight. ODHE, ODE, and the CCP advisory committee should work with the General Assembly to clarify and strengthen the management, oversight, and compliance monitoring functions necessary to allow CCP to reach its potential. In doing so, they should consider what structures and resources will be necessary to continue to monitor and improve the program in order to provide strategic direction that will support the evolving needs of Ohio's students, economy, and workforce.

Impact

Clarifying that ODE and ODHE, either jointly or through the CCP Advisory Committee, have statutory authority to oversee the general direction and success of the program, beyond simple statutory program requirements, would ensure that instances of non-compliance are addressed, program goals are set and achieved, and that the program produces the best outcomes possible for Ohio students and their families.

Background

The laws which govern CCP do not designate any individual, department, or organization oversight authority for the program. While ODHE and ODE are tasked with operational functions related to the program, it is primarily in relation to the transfer of funds and collection of data. ODE and ODHE are also required to establish a CCP advisory committee to assist in the development of performance metrics and the monitoring of program performance. This group of stakeholders is advisory in nature, and while they may lobby the General Assembly for changes, such as the new eligibility requirements, ODE and ODHE are not required to act on the advice of the committee.

Methodology

To understand how CCP operates, we interviewed representatives from ODHE and ODE to better understand each department's roles and responsibilities related to the program. We also reviewed relevant ORC and OAC provisions to determine what laws and rules exist that govern the actions of both departments. Specifically, we attempted to identify what program oversight functions were in place at the department level and how that oversight guided the program in comparison to best practices.

Analysis

Throughout multiple interviews with representatives from both ODHE and ODE it became clear that both departments feel that their role in CCP is ensuring that the laws governing the program are implemented as stated. There is no formal compliance or oversight function for CCP that is established in the laws and rules governing the program and neither department feels that it is authorized to step outside of the requirements that are explicitly stated in law. This results in both departments serving primarily as data collectors and compilers. This data is then used to fulfill other requirements of the program, such as the creation of the annual report and the transfer of funds to colleges and universities.

Oversight, like compliance, implies a formal role related to program supervision. Compliance normally falls under oversight, but so does measurement, management, and program strategic direction. It intends for program participants to adhere to and meet the letter and spirit of enabling legislation so that the program achieves its intended purposes. It also helps ensure that interconnected or related parts of the program function together to carry out the program’s purpose. According to the Center for Community Health and Development at the University of Kansas in *Establishing Oversight Mechanisms* (2022), oversight mechanisms are used to:

- Assure accountability;
- Control quality;
- Ensure adherence to laws and regulations;
- Control unfair treatment, corruption, illegality, and unethical behavior; and,
- Ensure effectiveness of programs or efforts for which you have responsibility.

The absence of program-level oversight means that no one is working to ensure colleges, universities, and school districts comply with program requirements, such as those discussed in [Recommendation 1](#). Further, without a strong oversight function, there is no push to create formal goals and objectives as discussed in [Recommendation 6](#). While the number of dual enrollment credits earned under CCP has nearly tripled compared to PSEOP, there is no oversight function that is working to identify the overall impact and effectiveness of the program and there is no effort to guide the program to optimize outcomes for Ohio students and families.

Conclusion

Neither ODE nor ODHE have taken a formal lead on ensuring school districts, colleges, and universities are within compliance of ORC as it relates to CCP. This is mainly due to current ORC not establishing formal roles for compliance and oversight functions. Likewise, the absence of formal oversight authority was indicated as a reason that program participation targets and formal goals and objectives had not been developed by either organization (see [Recommendation 6](#)). Without formal roles for oversight, the agencies are not required to, and have chosen not to, take the initiative necessary to follow through with compliance related activities to ensure equal access to CCP throughout all districts.

Through clarified oversight responsibility, accompanied by sufficient resources to properly monitor and steer the program, the General Assembly could greatly enhance the oversight of the program, ensure greater strategic direction, and reduce instances of noncompliance, thereby better ensuring equal program access to all Ohio students. Whether through a combination of dedicated staffing at ODE and ODHE, expanded roles, appropriate resources, and leveraging of the CCP Advisory Committee, greater program oversight is essential for CCP to meet the expectations of lawmakers, parents and students.

Recommendation 8: Improve Data Collection and Utilization

There is a significant amount of data collected by both ODHE and ODE regarding the CCP program, and the content and quality of this data exceeds that of most peer state dual enrollment programs. This data is largely related to program participation while students are in high school and is used to comply with annual reporting requirements that provide historic detail on the outputs of the program. While the data collection practices used by ODHE and ODE are generally good in comparison to peer states, there is room for improvement. In some cases, there are data fields that are incomplete, particularly as it relates to demographic information, and data that is inconsistent in nature, such as identifying the type of courses being taken. This type of information is critical in identifying where program improvements could be made. Both ODHE and ODE should work to ensure that the CCP data collected is both complete and consistent. This information can then be leveraged to identify and work towards strategic programmatic goals.

Impact

Improved outcome data collection and use of current data could be leveraged to work towards strategic programmatic goals. This will help stakeholders measure program success in more meaningful ways and assist ODHE and ODE in best directing time, attention, and resources. In turn, improving data management efforts will help both departments identify ways to continue to improve the experience for students and their families.

Background

On an annual basis, Ohio produces a publicly available report on CCP participation, demographics, and outputs. Generally, Ohio’s annual report is more comprehensive and robust in comparison to the peer states in terms of the type and volume of data collected and reported on. The annual reports are important for understanding the success of the program along with providing transparency.

CCP Annual Report

Under the current law, ODHE and ODE must submit an annual report outlining program participation metrics to the Governor and the General Assembly. This report must only be published until December, 2023. After this time, unless the law is changed, ODHE and ODE will no longer be required to submit this annual report.

Methodology

During the audit, a significant amount of data was requested, collected, and analyzed. We compared the program’s data collection and reporting efforts to peer states with similar dual enrollment programs. While conducting analyses, we encountered instances of incomplete data or data that is not currently collected. We also found that for data that is collected, certain analyses could be completed within the CCP program and even included in the annual report. We listed instances of data deficiencies that prevented us from completing analyses we sought to

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conduct in the audit, the reasons why they could not be completed, and why the outcome of these analyses would help the CCP program.

Analysis

Overall, ODE and ODHE are successful at collecting and reporting data relative to other states. For example, while Illinois, Georgia, and North Carolina produce publicly available reports for their respective dual enrollment programs that include outcome information, they generally do not go into as much depth and detail as Ohio's annual report. Similarly, Michigan has a publicly available web browser tool that has information on its dual enrollment program but is not as detailed as Ohio's annual report. We also noted that Pennsylvania and New Jersey do not have publicly available reports.

While Ohio is better than most other states in this regard, the data collection, reporting, and analysis of the data could be improved and reach the level of being the national standard for dual enrollment annual reports. Three areas of notable improvement are:

- **Incomplete Data:** These areas include data that is being collected, but the data may not be complete enough for performing an analysis.
- **No Data:** These areas include data that is not collected or being collected in a manner that would allow for useful analysis.
- **Maximize Use of Data:** These areas include data that is being collected, is considered sufficient and accurate, but is not being fully utilized by ODE and ODHE to better the program.

The following is a breakdown of these three areas, the types of analysis we hoped to complete, and where the data was either missing, incomplete, or underutilized for the purposes of improving the CCP program.

Data Access

Performance audits often rely on data that is obtained directly from the client. At times, this data can be sensitive and confidential in nature. In some cases, especially in the case of federally protected data, information is shared through negotiated agreements to ensure data integrity and security. During the course of this audit, data requests were made to ODE and ODHE separately in order to perform specific analyses related to the CCP program.

ODHE engaged in negotiations regarding the sharing of their data with the AOS that began in April 2021 and ended in February 2022. ODHE expressed concerns regarding the federal Family Educational Rights and Privacy Act (FERPA) as the reason for limiting access to existing data and their data systems. The Auditor of State respectfully disagrees with ODHE's interpretation of FERPA and would note that the federal guidelines make provisions for auditors' use of this information.

Ultimately we were provided a limited amount of data which impacted the types of analyses we were able to complete and had a significant impact on the audit timeline. Further, we were unable to access the system directly, and the query language (SQL) used to obtain the data was withheld from our office. While we want to acknowledge that ODHE's data staff were generous with their time and collaborated readily with our team, these protracted negotiations coupled with limited access to the source data systems made it more challenging to complete this audit. Additionally, while we concluded that the data is sufficiently reliable for the purposes of this audit, the reader should be aware that OPT was unable to fully validate the completeness of the data provided by ODHE.

Incomplete Data

Degree Attainment Timelines

We wanted to analyze and compare CCP students to traditional students regarding length of time to complete post-secondary degrees. We wanted to see if students that completed CCP courses were graduating at a quicker pace than traditional students and make general comparisons between the timelines of CCP students and traditional students. We were not confident in the data that was provided in this regard, which hindered our ability to perform these comparisons for the sake of this audit. While there is a metric for capturing the length of time it takes for a student to obtain a degree, the metric does not take into account a student that has any time gap during their college career.

Demographic Data

While the annual report does include a plethora of student demographic data, there were consistent instances of incomplete data components when we examined the source data. For comparisons among different student demographics to be accurate and considered sufficient, these data areas would need to be more complete. There were considerable percentages of unknown student values for race, high school graduation year, and whether a student was economically disadvantaged. These areas of data are often considered sensitive but still important in understanding demographic trends related to CCP participation as well as the needs of various populations.

No Data

Open Educational Resources Data

We wanted to gain a comprehensive understanding of the degree to which Open Educational Resources³¹ (OER) are used within the CCP program. Additionally, we wanted to compare the rates of OER utilization for CCP amongst all colleges and universities. Lastly, we wanted to measure the financial impact of OER utilization in the program relative to traditional course materials. These types of analyses would be beneficial for the purposes of strategic decision-making regarding where best to focus attention and resources for increasing OER utilization in the program. We did not complete any analyses with this because neither department collects nor tracks this data. While we were able to obtain a limited amount of OER data for community colleges, it was provided through the Ohio Association of Community Colleges (OACC) as a result of a referral from ODHE (see [Recommendation 10](#)).

Teacher Credential Data

We wanted to determine the impact the number of credentialed teachers in a school district had on CCP participation. Having this data would allow us to have a better profile for each district as it relates to what areas teachers are getting credentialed in, the subjects these teachers are instructing, and how it relates to the types and numbers of CCP courses students are taking in

³¹ Open Educational Resources includes a variety of educational tools such as open source textbooks.

each district. While there is a limited amount of teacher credentialing data presented in the annual report, it is not sufficient to understand the current number of credentialed teachers at each district and across the state, what subjects they are credentialed in, and the impact these values have on CCP participation.

Maximize Data Use

Student Outcomes

We conducted numerous analyses using data that is routinely collected for the CCP program. This includes the total credits for a CCP student at the time of their degree. We used the data provided to us to visualize the total credit hours a student had accumulated at the time they earned their post-secondary degree. Then we compared the traditional student data to the CCP student data from this analysis. This analysis showed for each high school graduating cohort, how many credit hours were taken to obtain a degree and whether CCP students take noticeably more total credit hours than a traditional student. The data showed that CCP students graduate with a similar number of total credits as their peers and are not taking excessive courses. The data that was used for this analysis is collected for the CCP program; the annual report illustrates this data in a bar chart by projecting the reduction in credits needed to graduate based on the number of hours earned through CCP. Using existing data, ODE and ODHE could show the real impact CCP credits have on student graduation rather than projections.

Type of Student Majors and Outcomes of Degrees

We analyzed what majors CCP students are pursuing or earned when they received their degrees compared to traditional students. We also ran analyses and comparisons on graduate degree outcomes in a similar manner to see what areas CCP students were focusing their graduate degrees in, however the number of students factoring into this analysis is still very minimal due to the age of CCP. Having this data would allow the Departments to conduct longitudinal analysis on career areas specifically related to CCP and traditional students and could provide a window into where CCP students are focusing their education along with comparing the degree outcomes to data regarding the needs of Ohio's workforce. Currently there is an example in the annual report pertaining to course subject areas CCP students are taking, but no representation of what areas of study these students are ultimately receiving degrees in.

Regression Analyses

We conducted numerous regression analyses during the audit to better understand and predict the relationship and impact multiple variables have on CCP participation. These analyses utilized data that is collected for CCP and other publicly available data related to CCP students or the school districts in which those students reside. Analyses we conducted included those between program participation and a broad range of variables that might predict CCP use, and how transferable CCP credits were for students once they moved to post-secondary education. These regression analyses should be included in the annual report and routinely used by ODHE and ODE to help steer specific efforts to raise participation and make the program more valuable to students. An example of this analysis is visualized in [Appendix C](#). Doing this will allow for a

better understanding of CCP outcomes and where the CCP program could improve going forward.

Conclusion

Both ODE and ODHE routinely collect and report data, and perform these functions at a higher level than the peer states. The departments should ensure that the data that is collected is complete and accurate, and is leveraged to its fullest extent. The departments should also work towards gathering additional, useful data points not currently collected. Taking these measures will improve visibility into the needs of the program and enhance strategic planning efforts, which will ultimately allow for the continued improvement of CCP for future students.

Recommendation 9: Update Default Rate Based on True Cost of CCP Delivery

When a student takes college courses through the CCP program, ODE directs payment to the college or university based on a default rate that is specified in ORC. The default rate varies based on the delivery model and contains both a maximum and minimum charge. The current formula that establishes the default rate uses a set dollar amount identified in ORC as a baseline and has not been significantly updated since the program first began. The General Assembly should review the default payment rates to ensure that they appropriately reflect the current cost to IHE's to provide CCP courses to high school students. In doing so, the General Assembly should consider how future changes to the foundation funding model might impact the program's default fee rates.

2022 Default Rates

High School Instructor (Floor Rate)	\$41.64
College Instructor (Mid-Tier Rate)	\$83.28
On Campus (Ceiling Rate)	\$166.55
Online (Ceiling Rate)	\$166.55

Impact

The default rates may not be reflective of the current costs to educate CCP participants. Adjusting the default rates could have significant financial implications for school districts, colleges, and universities. However, it is important to note that there is uncertainty in what those implications may be. Our analysis determined that CCP deductions currently make up, on average, less than one percent of all state revenue for each school district. These deductions, which flow to colleges and universities as revenues, represent 2.7 percent of their total state revenues from SSI payments. However, an update to the rate schedule may increase or decrease the amount of funding deducted from individual school districts, depending on the method of CCP course delivery that is most commonly used. Because there is a lack of clarity surrounding the additional funding received by colleges and universities through SSI (See Issue for Further Study), the true impact of default rate changes to these institutions is difficult to predict.

Peer Comparison

Out of the six peer states we examined, only two have a structured tuition cost model for dual enrollment. In the remaining peer states, the cost of tuition is a local decision between the secondary school and college or university. While the CCP program allows for negotiations within defined parameters, the General Assembly could consider adopting a model similar to the majority of the peer states and eliminate the default rate schedule, thereby allowing CCP tuition rates to be fully negotiable between school districts and colleges and universities on a case by case basis.

Methodology

We compared the prevalence of default rate usage to negotiated rate usage in FY 2020 and FY 2021 CCP School Deduction reports, and how the negotiated rates compared to the default rates. To determine the relative impact of CCP revenue deductions on school districts, we determined total CCP deduction amounts for each district and divided by the total state revenue per district.

Analysis

Tuition amounts paid by school districts via foundation funding deductions are either negotiated between school districts, colleges, and universities, or based on a default rate schedule that is codified in Ohio law under ORC § 3365.07. The default rates vary based on the CCP course delivery method and are calculated as a function of \$6,020, which was the per-pupil foundation amount at the time of passage by the General Assembly. Essentially, a school district either negotiates a specific tuition rate with the participating college or university or the district pays the college or university in accordance with pre-determined default floor, mid-level, or ceiling rates as established under law. In the absence of a negotiated agreement, a college or university may only receive the lesser of the default ceiling or mid-level rate (depending on delivery method), or its standard tuition rate. A college or university may not receive less than the default floor rate unless approved by the Chancellor of Higher Education.

Default Rate Schedule

As shown in the table below, the default rates have increased only marginally since AY 2018.

CCP Default Rate Schedule, 2018 – 2021

Academic year	Per-Pupil Foundation Amount	Ceiling Rate Course delivered on college campus or online (0.83 of foundation /30)	Mid-Level Rate Course delivered at the high school with faculty instruction (0.5 of ceiling rate)	Floor Rate Course delivered at the high school, with credentialed teachers (0.25 of ceiling rate)
2019-21	\$6,020	\$166.55	\$83.28	\$41.64
2018	\$6,010	\$166.28	\$83.14	\$41.57

Source: ODHE

Since the inception of the CCP program, the school funding formula was revised in Ohio House Bill 110, the state’s biennial budget bill, subject to a phase in. Prior to this change, the formula included a base per pupil funding amount of \$6,020 for every student across the state. However, the modified foundation formula uses a new methodology for funding allocation that is based on student teacher ratios, minimum staffing levels, and actual costs. This formula results in a separately calculated formula amount for each district. When fully phased in, the new funding model will result in an estimated average base cost per pupil of \$7,350. However, ORC §

3365.01 made a permanent law change and fixed the CCP formula amount at \$6,020. Unless the General Assembly modifies this amount, the default tuition amounts for CCP will remain unchanged.

Use of Default Rate

Under the current structure, it is possible to negotiate an alternative fee for three of the four delivery models without approval from ODHE. For CCP courses taken on campus or online, the fee may range from the floor (\$41.64) to the ceiling (\$166.55). For courses taken in a high school with a college instructor, the fee may range from the floor (\$41.64) to the mid-level rate (\$83.28). If a course is taken in the high school using a credentialed high school teacher, the floor rate (\$41.64) must be charged unless an alternative payment is approved by ODHE.

The majority of courses taken through CCP use the default rate. However, this is because the most prevalent delivery model is the credentialed high school teacher model, for which the default rate is also the floor, beyond which negotiation is extremely rare. As seen in the table to the right, for the other three delivery models, more than half of courses that were taken had a negotiated rate.

Percentage of Negotiated CCP Hours by Delivery Model

	Total Hours	%
College Instructor		
Default	19,996.63	45.2%
Negotiated	24,195.05	54.8%
High School Instructor		
Default	245,017.10	99.6%
Negotiated	909.00	0.4%
On Campus		
Default	47,281.63	58.9%
Negotiated	33,041.53	41.1%
Online		
Default	104,711.07	42.6%
Negotiated	140,962.08	57.4%

Source: ODE

True Cost of CCP Delivery

During the course of the audit, we examined the default rates used for CCP. While set in statute, the origination of the default rate is unclear. No documentation was provided regarding the methodology used to create the default rates, and interviews with different stakeholders who were involved in the process identified differing opinions on what was considered and included. However, the average tuition fee per credit hour for traditional students is generally higher than the default fee schedule.

The structure of the default rate schedule acknowledges that there is a varying level of expense to educate students for colleges and universities based on the CCP delivery model used. Those courses that are attended on a college campus or online carry the highest fee, indicating that these students would be the most costly to the institution. However, for those students taking courses online, there is typically a limited need to be physically present on the college campus.

While there are costs associated with the infrastructure necessary to provide online courses, the marginal cost of adding CCP students to these courses likely does not merit the same payment as an on campus course. Further, in 2021, 40 percent of CCP credit hours were taken in a high school and taught by a high school teacher, which was the most prevalent delivery model. At the high school, the teacher’s salary and materials necessary for the course are paid for by the district. This means that most of the cost associated with the delivery of course materials for the high school teacher delivery model is borne by the secondary school and not by the college or university.

Since the original concept of the tying default rates to a fraction of the school district foundation formula, payments has been disrupted by the new school funding model, some reconsideration of the basis of default rates will likely be required, and a thorough review of the true cost of CCP by delivery model will be necessary to set an appropriate default rate schedule. This review should consider what the marginal cost of adding CCP students to the college or university is, and who bears that cost.

Conclusion

ODHE and ODE should work with the General Assembly to revisit the CCP default rate formulas and establish a methodology for determining each of its components. Through the process of revisiting the methodology, ODHE, ODE, and the General Assembly should consider the true cost of providing college courses through CCP. This will include a variety of factors, including the cost of instruction, to ensure the program is delivered in an effective manner for Ohio students, taxpayers, and families.

Recommendation 10: Leverage Open Educational Resources

In addition to CCP participation fees, school districts are also required by law to cover the costs of textbooks, which can be costly. One way to reduce the impact of purchasing textbooks is through the use of open educational resources (OER), which are freely accessible, openly licensed text, media and digital assets including college textbooks, online supplements, etc. While efforts have been made to expand opportunities for the use of open educational resources in the State, their current utilization appears to be limited. The General Assembly should require ODE and ODHE to promote opportunities to increase the use of OER materials among CCP participants and could consider splitting the cost of educational materials between colleges and universities and high schools. A strategic effort should be made to align existing and available OER materials with CCP courses offered among the State's various colleges and universities. Collaborative efforts should be aimed toward gaining wider acceptance and adoption of OER materials among Ohio's colleges and universities. Increased adoption of OER textbooks would reduce costs to school districts, which could, in turn, encourage further participation in the program.

"The constant updating of books and the high prices puts a strain on the district."

- K-12 Administrator

Impact

Under the current funding model as prescribed by Ohio law, school districts bear the cost of textbooks for CCP participants. According to the Bureau of Labor Statistics, college textbook prices have risen nationally by 34 percent over the last decade. Generally, textbooks have a relatively short shelf-life, with production cycles often between two to three years. Rising textbook prices coupled with frequent textbook adoptions of updated editions contribute to financial strain on school districts regarding paying for CCP student textbooks. Using OER materials would lower the costs on school districts, as well as for traditional students, and potentially increase the number of schools that encourage CCP participation among its students.

Methodology

We reviewed publicly available information regarding the current state of open educational resources utilization in Ohio. We also scheduled and conducted interviews with representatives of ODE and ODHE regarding the utilization of open educational resources in the CCP program. ODE and ODHE representatives noted that this data was not tracked by either agency and referred us to the Ohio Association of Community Colleges where we were able to obtain a limited data set on OER utilization at the community college level. We then identified potential opportunities to increase utilization in the program.

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Analysis

Current Cost Saving Strategies

Feedback gathered from our survey of school districts in Ohio indicated that the cost of textbooks was a chief complaint about the CCP program. As a result of this feedback, we looked at potential cost saving strategies for textbooks. We found that some institutions, like Marion Technical College, have instituted textbook rental programs whereby textbooks are rented to school districts at discounted rates.

Another cost saving strategy is through increased adoption of OER. OERs are freely accessible, openly licensed text, media and digital assets including college textbooks and online supplements. While current use is limited, Ohio has made a concerted effort to make progress in the open-source space and may already have a platform in place to facilitate significant gains in open-source textbook utilization, this is most notable with the Ohio Library and Information Network (OhioLink).

OhioLINK

OhioLINK is Ohio’s statewide academic library consortium. It serves 118 libraries, 89 institutions of higher education, the State Library of Ohio and more than 570,000 end users. OhioLINK leverages cooperative funding, collective buying power, and centralized services to manage acquisition and access to a wide range of scholarly e-resources. The shared Digital Library of e-journals, e-books, and databases is delivered to institutions of higher education for \$52 per student—less than the average cost of a single college textbook. Some of the material available on OhioLINK includes an open-source content library, which is a dynamic digital library and network of open education resources curated and created by Ohio faculty. OhioLINK is a platform that could be further leveraged to increase the use of reduced cost digital textbook materials.

In June of 2017, ODHE awarded a \$1.3M Innovation Grant to North Central State College, in collaboration with Ohio State and Ohio Dominican universities, and 15 other community colleges, to create 23 course content packages of OER for high enrollment courses. According to the Ohio Association of Community Colleges (OACC) and OhioLINK, in AY 2020, more than 43,000 students across 15 colleges and universities replaced commercial textbooks with OER, saving more than \$6.2 million, more than four times the initial \$1.3 million investment. The

Textbook Cost Sharing

While secondary schools are required by law to cover the cost of textbooks for CCP participants, several of the peer states do not have a similar requirement. In half of the peer states we examined, the cost of textbooks for dual enrollment participants is a local decision between the secondary school and college or university. Yet another peer state places the burden of textbook costs on the state, not on the participating secondary schools.

In light of this, the General Assembly could consider following a similar approach and allow for textbook cost negotiations between school districts and colleges and universities. Perhaps another option the General Assembly could consider is an even split of textbook costs between secondary schools and colleges and universities. Any measure that would shift a portion of the burden of textbook costs away from secondary schools and alleviate financial pressure on them could have positive effects on program participation, as districts may be more inclined to better promote the program.

digital content modules present alternatives to commercial textbooks for Ohio students. Full course guides using OER materials are available for many of Ohio's high enrollment courses. They can be adopted in full or in part to meet the needs of instructors.

In terms of OER utilization for CCP, data provided by the OACC indicates that OER were utilized for 11,713 total CCP course enrollments in AY 2021, among Ohio's community colleges. This represents roughly 7 percent of the approximately 160,000 total course enrollments among all of Ohio community colleges in 2021. It is also important to note that ODHE was unable to provide OER utilization data for main campus and regional colleges (see [Recommendation 8](#)).

Conclusion

ODHE should continue to promote and strengthen resources in OhioLINK's Ohio Open Ed Collaborative and should work with institutions of higher education to identify opportunities to leverage the OhioLink platform in order to increase the utilization of OER materials among CCP participants. A strategic effort should be made to align existing and available OER materials with CCP courses offered among the State's various colleges and universities. Collaborative efforts should be aimed toward gaining wider acceptance and adoption of open-source materials among Ohio's colleges and universities. Increased adoption of open-sourced textbooks would reduce costs to school districts, which could potentially increase their collective propensity to encourage CCP participation.

Issue for Further Study: Review SSI Funding in Relation to CCP Participation

Public colleges and universities receive funding from the state through the State Share of Instruction (SSI) for the education of Ohioans. This funding is based on a complex formula that takes into account student enrollment and academic outcomes. Each public college and university reports detailed cost information to ODHE within the Higher Education Information (HEI) system, and that data serves as the basis for the SSI calculations. However, we found that CCP students are counted the same as traditional students, regardless of CCP delivery type of course completed. This means that a CCP student using the high school instruction delivery method could generate the same SSI value for a college or university as a traditional on-campus student. As a result, the SSI funding received for CCP students may be outsized relative to the actual costs to educate them.

Students that do not participate on a college campus likely do not require the same level of resources to educate but are still factored into the SSI formula in the same manner as traditional on-campus students. By design, the default rates used for CCP fee deductions are lower than standard tuition rates, which demonstrates recognition from the state that the funding for CCP credit, in terms of tuition, should be paid at a lower rate than credit completed by traditional students.

A significant majority, nearly 70 percent, of CCP courses are taken through a community college. In our analysis, we found that community colleges tended to be innovators in program structuring, K-12 outreach and recruiting, and student supports. We also found that community colleges were more likely than four-year institutions to partner for high school instruction and negotiate alternative payment structures to the default rate. Enrollment through CCP is important to community colleges, and specifically in FY 2020, CCP credits accounted for approximately 20 percent of total credits completed at community colleges in Ohio, while comprising only 2.3 percent of total undergraduate credits completed at four-year institutions. In some extreme cases CCP accounted for more than 40 percent of all hours taken at an individual institution.

Top 10 Higher Education Institutions

CCP Hours as a Percent of Total Undergraduate Hours

	% of FY20 Undergrad CCP Hours	Number of FY20 CCP Hours
Edison State Community College	48.4%	27,238.00
Southern State Community College	44.6%	19,805.00
Chatfield College	36.5%	1,570.00
Zane State College	36.3%	13,484.00
Washington State Community College	32.6%	11,650.00
North Central State College	30.4%	15,539.00
Central Ohio Technical College	27.2%	16,822.50
Marion Technical College	25.5%	10,786.00
Clark State College	24.2%	23,983.50
James A Rhodes State College	23.9%	13,308.00

Source: ODE and IPEDS

Overall, enrollment at colleges and universities is declining in Ohio. It is possible that, at some of these institutions, the enrollment via CCP is helping to maintain existing staffing and budget levels despite the loss of traditional students. This is of particular note because, as discussed in [Recommendation 9](#), the default rates for CCP are not tied to true cost of providing educational opportunities. It is possible the revenue community colleges receive for CCP courses is allowing those institutions to postpone the need to make critical decisions regarding the rightsizing of operations. In particular, IPEDS notes that the largest expense category for community colleges is instruction, which includes the salaries and benefits of faculty and/or instructors. In instances where CCP courses are taught at the high school, the instructional expense shifts to the high school.

The CCP default rates establish precedent that CCP instruction is to be funded at a lower rate than traditional instruction. The floor rate for high school instruction illustrates this. Tuition is significantly reduced for the high school delivery model to account for the lower cost of instruction relative to on campus course delivery and other instructional methods of delivery. Therefore, it may follow that SSI funding for CCP should be allocated in a similar manner, as a function of the relative cost to educate CCP students.

The CCP tuition default rate schedule is a reflection of the State’s recognition that CCP coursework is generally less expensive to provide relative to traditional, on campus post-secondary education. Implementing a separate formula to calculate CCP credit hours would more accurately depict the total cost for each institution. As the state decides how to distribute a finite pool of higher education resources, it is important to consider how these subsidies can have the greatest impact. The long-term effects of this shift could result in a material redistribution of

funding among public colleges and universities, but additional research and analysis would be needed to quantify this potential impact. The State should also consider redirecting the savings realized from funding CCP students at a reduced rate back into the program.

Note on Colleges and Universities with Respect to CCP

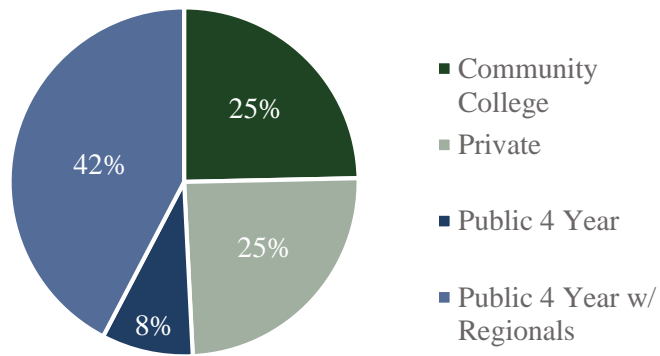
Students have options regarding where they enroll for higher education. In Ohio, a student may attend a private institution, a community college, a public four-year college, or one of the several universities with regional campuses. As seen in the pie chart below, nearly half of all undergraduate hours are taken at a public four-year college.

All public colleges and universities in Ohio participate in CCP and offer programming to eligible students. In addition, some private higher education institutions also choose to offer courses to CCP students. As seen in the second pie chart, the majority of CCP credit hours are taken through or at a community college. This indicates that the programming that is offered varies between institutions and between institution type.

Understanding the varying levels of participation among institutions may help ODE and ODHE make strategic improvements designed to boost the overall impact of the CCP program on Ohioans.

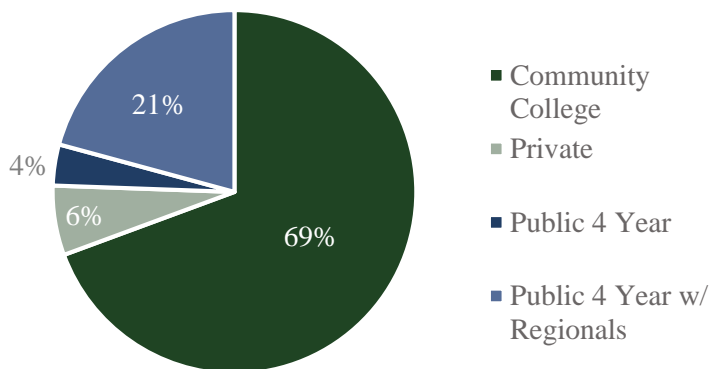
During the course of the audit, we were able to make several observations regarding the variation in CCP participation among colleges and universities. Some of these observations are discussed below. Additional information on university participation can be found via the online data dashboard.

FY 2020 Total Undergraduate Hours by Institution Type



Source: IPEDS

FY 2021 Total CCP Hours by Institution Type



Source: ODE

Institutional Participation

Community colleges represent the largest group of institutions that provide CCP courses. While nearly 70 percent of all CCP courses are taken through a community college, there are some universities that provide a significant portion of CCP courses taken in their community. The table on the following page shows the 10 institutions that had the most CCP credit hours in 2021. These 10 institutions account for more than half of all the CCP hours taken in this timeframe.

Top 10 Higher Education Institutions by Total CCP Hours

College Name	College Type	% of FY21 Total CCP Hours	Total FY21 Institution CCP Hours
Columbus State Community College	Community College	10.0%	61,821.4
Sinclair Community College	Community College	8.1%	49,768.2
Kent State University	Public 4 Year w/Regionals	5.6%	34,353.5
Cuyahoga Community College	Community College	5.2%	31,771.6
Edison State Community College	Community College	4.6%	28,241.5
Lorain Co Community College	Community College	4.6%	28,043.6
Stark State College	Community College	4.5%	27,693.1
Bowling Green State University	Public 4 Year w/Regionals	3.5%	21,686.1
Clark State Community College	Community College	3.5%	21,426.9
University Of Akron	Public 4 Year w/Regionals	3.4%	21,203.1

Source: ODE

Delivery Models at Colleges and Universities

While there is a heavy reliance on community colleges to access CCP overall, each type of institution has similar credit hour participation per enrolled student. As seen in the table to the right, the variation in credit hours attempted per student between institution type was less than two hours.

Credits Attempted by Institution Type

	Average Credits Attempted per Enrolled Student
Community College	9.26
Private	8.84
Public 4 Year	9.91
Public 4 Year w/Regionals	8.16

Source: ODHE

Although the average credit hours per student is similar across all institution types, the delivery models are used to varying degrees. Notably, more than half of CCP hours taken at public universities with regional campuses were taken online. Additionally, no institution type is utilizing the college instructor in a high school setting delivery model to a significant degree. This is particularly of note as enrollment in colleges decline and institutions face a declining demand to provide classes on campus.

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Average Proportion of CCP Credits by Delivery Type

	Online	High School Instructor	On Campus	College Instructor
Community College	34.74%	45.74%	13.02%	6.50%
Private	29.41%	22.46%	44.17%	3.95%
Public 4 Year	26.32%	42.96%	30.72%	0.00%
Public 4 Year w/ Regionals	50.48%	21.40%	23.73%	4.40%

Source: ODHE

Colleges Serving the Community

An additional way of reviewing a college or university's participation in CCP is to identify the number of school districts it serves. It should be noted that a district cannot require a student to attend a particular institution for CCP courses, but established partnerships could ease a student's path to enrolling in CCP and being successful in the program. Additionally, any district using the high school delivery models would need to partner with an institution for course delivery.

The table below shows the ten institutions with students from the most school districts. Notably, five of the ten institutions are four year universities with regional campuses. These institutions have CCP hours reported in aggregate, which means that all campuses are reported under one umbrella. Because these institutions have campuses in multiple locations, they likely are able to serve more districts in a wider geographic area compared to other public institutions.

Top 10 Higher Education Institutions by Number of Public School District Served

Institution	Institution Type	# of Public Secondary Districts Served	FY21 CCP Credit Hours
Kent State University	Public 4 Year w/ Regionals	159	34,354
Ohio State University	Public 4 Year w/ Regionals	158	11,348
Sinclair Community College	Community College	120	49,768
Bowling Green State University	Public 4 Year w/ Regionals	104	21,686
Cedarville University	Private	100	1,168
Columbus State Community College	Community College	95	61,821
Ohio University	Public 4 Year w/ Regionals	92	12,101
Stark State College	Community College	86	27,693
Cuyahoga Community College District	Community College	85	31,772
University of Akron	Public 4 Year w/ Regionals	73	21,203

Source: ODHE and ODE

Innovative Ideas

Some community colleges offer free tuition for students that participate in CCP at the college and continue their post-secondary education at the same institution. These programs encourages participation at the high school level and allows for continuity of education. The student may benefit from developing a familiarity with the institution and does not need to worry about credit transfers to a new college or university. The college also benefits in this scenario, increasing the funding it receives from CCP participation as well as increasing the likelihood that it will obtain additional SSI funding for program completions.

To improve the ability to encourage participation and retain students through a baccalaureate program, universities may wish to review some of the marketing initiatives undertaken by community colleges. For students seeking a bachelor’s degree, it would ease the transition from high school to college and remove lingering questions regarding the ability to transfer credits. Encouraging CCP participation through regional campuses or directly at university main campuses would also improve the likelihood that students choose to stay in Ohio for their post-secondary education.

Rates Charged for CCP Credits

While the default rates for the CCP program are set in law, some institutions and school districts choose to negotiate the rates passed on from the secondary schools to the institution of higher education. Our analysis shows public four year universities that do not have regional campuses do not have any hours in the college instructor delivery type. In addition, the data shows that institutions of higher education of all types have a tendency to negotiate down the online delivery type payment rates. Overall, community colleges have the lowest average rates in all delivery types.

Average CCP Fee Charged per Credit Hour by Delivery Model

	High School Instructor	College Instructor	On Campus	Online
<i>Default Rate</i>	\$41.64	\$83.28	\$166.55	\$166.55
Community College	\$41.64	\$72.44	\$128.36	\$106.59
Private	\$42.25	\$94.46	\$161.60	\$161.86
Public 4 Year	\$41.64	-	\$165.45	\$159.17
Public 4 Year w/ Regionals	\$41.64	\$82.21	\$148.39	\$145.08

Source: ODE

Public schools, comprised of community schools, joint vocational school districts (JVSDs), and traditional school districts, may negotiate with colleges or universities to pay an alternative fee

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for CCP courses. As noted in the table below, each type of school negotiates fees to varying degrees. More than half of all community school CCP credits are taken using a negotiated rate, whereas JVSDs negotiated only 13 percent of CCP hours. It should be noted that while traditional school districts negotiate alternative fees for only 32 percent of CCP credit hours, those districts represent the vast majority of all negotiated CCP credit hours.

Total CCP Hours with Negotiated Fees by District Type

District Type	Total Negotiated Hours	% of Total Hours by District Type
Community School	10,029.62	53.1%
Joint Vocational School District	4,133.16	13.7%
Traditional School District	184,944.88	32.6%

Source: ODE

At each type of public school, there is variation in which types of credit hours are negotiated, based on CCP delivery model. The table on the following page breaks down the negotiated hours by delivery model at each type of public school. Notably, nearly all community school CCP courses taught by a college instructor, 91.5 percent, used a negotiated rate. Further, all public school types had the most hours negotiated within the online delivery model.

Total CCP Hours with Negotiated Fees by District Type

District Type	Hours	% of Total Delivery Type Hours	Average \$ per Negotiated Hour
Community School			
College Instructor	1,104.5	91.5%	\$45.22
On Campus	1,783.0	48.7%	\$74.27
Online	7,142.1	62.3%	\$89.53
Joint Vocational School District			
College Instructor	715.6	38.5%	\$50.99
On Campus	371.5	10.6%	\$74.19
Online	3,046.0	51.1%	\$55.54
Traditional School District			
College Instructor	22,374.9	54.4%	\$69.55
High School Instructor	909.0	0.4%	\$56.71
On Campus	30,887.0	42.2%	\$105.29
Online	130,773.9	57.3%	\$84.07

Source: ODE

Ohio's Private Institution Participation in CCP

While they represent a small proportion of overall hours taken by CCP students, at 5.9 percent in FY20, Ohio's private institutions still play a role in delivering CCP credits. In FY20, 31 private

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institutions of higher education participated in the provision of CCP credits to Ohio’s high school students. Below are the top ten providers of CCP credit hours by private institutions.

Top 10 Private Institutions by Total CCP Hours

	Number of FY20 CCP Hours
University Of Findlay	8,133.00
Kenyon College	5,028.00
Ashland University	3,189.00
Hiram College	2,818.24
Tiffin University	2,659.00
Cedarville University	2,645.50
Ohio Christian University	2,271.00
Mount Vernon Nazarene University	2,071.00
Notre Dame College	1,829.00
Chatfield College	1,570.00

Source: ODE

Conclusion

While not the focus of this study, institutions of higher education play an important role in the delivery of the CCP program. Understanding who is participating in the delivery of credit hours for this program, at what rates, and in what delivery types, is both interesting and essential data to understand and study further. This information is critical and can help inform future improvements to CCP. It may also provide valuable insights into programmatic best practices and other innovative practices that can impact student success.

Client Response Letter

Audit standards and AOS policy allow clients to provide a written response to an audit. The letter on the following page is the official statement from both ODHE and ODE in regards to this performance audit. Throughout the audit process, staff met with officials from both departments to ensure substantial agreement on the factual information presented in the report. When the either Department disagreed with information contained in the report and provided supporting documentation, revisions were made to the audit report.



Department of Education
Department of Higher Education

Mike DeWine, Governor
Dr. Stephanie K. Siddens, Interim Superintendent of Public Instruction
Randy Gardner, Chancellor

July 15, 2022

The Honorable Keith Faber
Auditor of State
88 E. Broad Street
Columbus, OH 43215

Auditor Faber:

The Ohio Department of Education (ODE) and the Ohio Department of Higher Education (ODHE) sincerely appreciate the work of the Auditor of State, specifically the Ohio Performance Team, on the recently completed Performance Audit of the College Credit Plus program (CCP). Our agencies value and appreciate the collaborative partnership that resulted in these audit findings and recommendations. Both agencies strive to improve operations and enhance the value that CCP can provide to each student seeking to participate in the program.

We sincerely appreciate your acknowledgment of the significant success of CCP and its standing as a best practice in a statewide approach to dual enrollment. We are confident in the work that has been done to shepherd the program to its current successes, and we are encouraged that most recommendations align with current and future projects. We thank you for your diligence, and we look forward to incorporating your recommendations into our strategies, policies, and procedures as we move forward in the implementation of this program.

The following are general responses to the recommendations and issue for further study included in the report.

Program Participation:

1. School District Compliance with Program Requirements

Both agencies are committed to supporting requirements for the program set forth in the Ohio Revised Code and Ohio Administrative Code. We appreciate the information gathered through surveying districts and will continue to analyze this as we continue our efforts to support the implementation of CCP.

2. Increase Access to CCP Courses at High Schools

We are committed to breaking down barriers to create a more accessible program. Student access to and success in College Credit Plus can increase when credentialed high school teachers are teaching college courses on the high school campus. We acknowledge the challenges schools face in this area and will continue to discuss how both agencies can support schools in this area.

3. **Teacher Credentialing Grants**

We are proud of the previous iterations of the “Teacher Credentialing Grants” that administered \$8 million to schools, districts, and colleges to increase the supply of credentialed teachers who can provide College Credit Plus coursework. Both agencies look forward to working with the General Assembly on any future investments in support of this effort.

4. **Minimize Barriers to Participation Among Underserved Student Populations**

A continuing priority for both agencies is to increase program participation for historically disadvantaged and underserved populations. We appreciate the focus on this and acknowledge this as a needed area of improvement. The recent change in eligibility requirements for the program is a move to support these efforts. We believe this will have a significant impact on underserved student participation and thank the Performance Team for acknowledging this work as a step forward for the program. College Credit Plus will continue to promote Innovative Programs. These programs exclusively address the needs of underrepresented student subgroups and are critical to increasing access to College Credit Plus. There are currently 26 approved Innovative Programs across the state and our agencies are committed to identifying best practices among these programs and encouraging replication. We also acknowledge the ongoing work of BroadbandOhio to improve access to reliable internet service.

5. **Robust and Uniform CCP Orientation**

Both agencies agree the transition between high school and college is a critical point in ensuring student success in any post-secondary pathway. We appreciate the diligence of the Performance Team in providing examples of best practices in this space for CCP students and we look forward to exploring how the successes of these programs can be replicated throughout the state.

Program Operations:

6. **Program Goals, Objectives, and Strategies**

Our collaborative team is committed to setting clear goals, objectives, and metrics for the College Credit Plus program. Earlier this year, our teams were awarded a grant through the College in High School Alliance to chart a path forward for the coming years of College Credit Plus. We are aligned with the Performance Team and are committed to setting both short- and long-term goals and priorities for the continued improvement of the program.

7. **Clarify and Enhance Program Oversight Responsibilities**

As stated in response to recommendation 1, our agencies are committed to the adherence of requirements for the program set forth in the Ohio Revised Code and Ohio Administrative Code. Our agencies will continue to collaborate to ensure schools and colleges are supported to operate CCP with fidelity.

8. **Data Collection and Utilization**

We appreciate the Performance Team’s commendation of Ohio’s data system as a nationwide leader in data collection for dual enrollment systems. We are proud of the data we are able to collect, synthesize, and share with Ohio’s education community through the College Credit Plus Annual Report. Both agencies

acknowledge the significant effort made by data professionals at each educational institution to ensure the quality of the data. With this recommendation in mind, we will continue the support of our robust and high-quality data practices. As the program matures and more cohorts of students matriculate through higher education, additional data will allow for more study of College Credit Plus.

9. Re-Evaluate the Default Rate Schedule

Our agencies appreciate the work of the Performance Team in their analysis of the default rates for College Credit Plus funding. We acknowledge the decision of the General Assembly to leave these rates unchanged in recent years. Any changes made to these rates by the General Assembly will be implemented with fidelity.

10. Leverage Open Educational Resources

In 2017, the Ohio Department of Higher Education awarded a \$1.3 million Innovation Grant to 18 institutions of higher education. The grant was awarded to support the development of Open Educational Resources (OER) and other materials, to reduce the cost of textbooks for students. The impact of the grant is the topic of several studies. Our agencies are committed to reviewing the data gathered from those studies and sharing that data with public colleges and universities to encourage institutions to continue the use of Open Educational Resources in the College Credit Plus Program.

• Issue for Further Study: SSI Funding in Relation to CCP Participation

The University SSI funding methodology consists of three primary funding components: 1. Course Completions (aka Completed Full Time Equivalents (FTEs)) which comprises approximately 30% of the university SSI appropriation; 2. Degree Completion which comprises 50% of the university SSI appropriation; and 3. Set-Asides. The Community and Technical College SSI methodology consists of three components: 1. Course Completions (completed Full Time Equivalents (FTEs) component which comprises 50% of the community and technical college SSI appropriation; 2. Success Points component which comprises 25% of the community and technical college SSI appropriation; and 3. Completion Milestones component which comprises 25% of the community and technical college appropriation.

The SSI formula provides cost-based reimbursement for the course completions and degree completions – where “degree completions” is a term that also encompasses certificates and for community colleges, transfers – portions of the SSI formula. These reimbursements are based on “modeled costs” which are in turn derived from statewide average costs as computed by ODHE’s resource analysis procedures. CCP courses are part of the resource analysis process, and thus have an impact on the computed statewide average costs of courses.

The implication of this is that differentials in costs of CCP courses by delivery method do have an impact on SSI reimbursements in the current formula through the channel of affecting statewide average costs. Quantifying the size of this impact, i.e. how much of the differential in costs by delivery method is currently reflected in SSI reimbursements, is not something that ODHE has done at this point. Doing so would take significant additional work, but ODHE will undertake to research this question in the next iteration of the resource analysis process.

Once again, we appreciate and commend the work of the Performance Team in the significant undertaking this audit represents. We value our partnership with your office and look forward to our continued collaboration.

Sincerely,

Handwritten signature of Stephanie K. Siddens in black ink.

Stephanie K. Siddens, Ph.D.
Interim Superintendent of Public Instruction

Handwritten signature of Randy Gardner in black ink.

Randy Gardner
Chancellor of Higher Education

Appendix A: Purpose, Methodology, Scope, and Objectives of the Audit

Performance Audit Purpose and Overview

Performance audits provide objective analysis to assist management and those charged with governance and oversight to improve program performance and operations, reduce costs, facilitate decision making by parties with responsibility to oversee or initiate corrective action, and contribute to public accountability.

Generally accepted government auditing standards (GAGAS) require that a performance audit be planned and performed so as to obtain sufficient, appropriate evidence to provide a reasonable basis for findings and conclusions based on audit objectives. Objectives are what the audit is intended to accomplish and can be thought of as questions about the program that the auditors seek to answer based on evidence obtained and assessed against criteria.

We conducted this performance audit in accordance with GAGAS. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Audit Scope and Objectives

In order to provide the Departments with appropriate, data driven, recommendations, the following questions were assessed.

Summary of Objectives and Conclusions

Objective	Recommendation
Outcomes	
What benefits are student participants and parents deriving from CCP?	Rec. 8
Participation	
What opportunities exist to increase participation in the program?	Rec. 1, Rec. 2, Rec. 3, Rec. 4, and Rec. 5
Governance and Implementation Strategy	

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How does the CCP program’s governance model and implementation strategy compare to other states, and/or best practices?	Rec. 6 and Rec. 7
Funding and Cost Implications	
How does Ohio’s CCP funding model compare to other states with a similar	Rec. 9, Rec. 10, and IFFS 1

Although assessment of internal controls was not specifically an objective of this performance audit, internal controls were considered and evaluated when applicable to scope areas and objectives.³²

Audit Methodology

To complete this performance audit, auditors gathered data, conducted interviews with numerous individuals associated with program operations included in the audit scope, and reviewed and assessed available information. Assessments were performed using available program data, outside studies, peer benchmarks, laws, rules, and policies and procedures.

Peer States

Program governance and funding dynamics were compared to states with dual enrollment programs that had similar K-12 enrollment to that of Ohio. Selected peers were within 20 percent of Ohio's K-12 student population for 2019. They include the states of:

- Georgia;
- Illinois;
- Pennsylvania;
- Michigan;
- New Jersey; and,
- North Carolina.

College and University Interviews

College and university interviewees were selected based on CCP participation as a percentage of total enrollment. We grouped all public institutions in the state into one of three categories of CCP participation- high, mid, or low. We then requested interviews with 30 colleges and universities, 10 from each group, in order to get a broad range of feedback. We ultimately

³² We relied upon standards for internal controls obtained from *Standards for Internal Control in the Federal Government* (2014), the U.S. Government Accountability Office, report GAO-14-704G

conducted 20 interviews with colleges and universities that were willing to participate in the study. The participating institutions are shown below.

College and University Interviewees

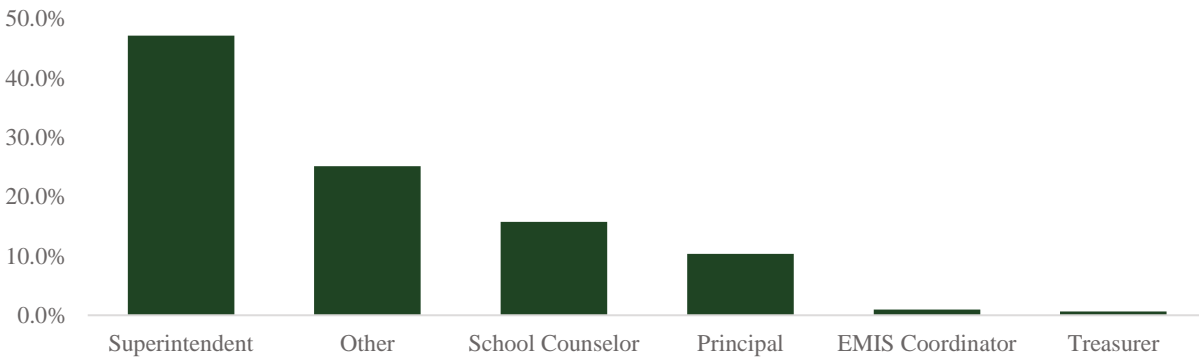
Institution	CCP Participation Group
Akron University	High
Central Ohio Technical College	High
Edison State Community College	High
North Central State College	High
Shawnee State University	High
Southern State Community College	High
Washington State Community College	High
Zane State College	High
Clark State College	Mid
Cleveland State University	Mid
Marion Technical College	Mid
Wright State University	Mid
University of Cincinnati	Mid
Belmont College	Low
Hocking College	Low
Miami University	Low
Northwest State Community College	Low
Ohio State Newark	Low
Ohio University	Low
University of Cincinnati - Blue Ash	Low

School District Survey Data

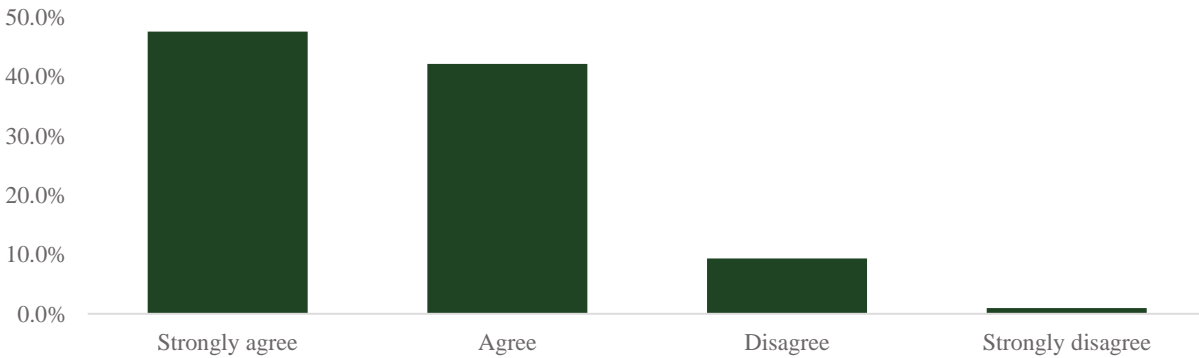
We sent a list of survey questions to representatives of school districts throughout the state and received responses from 318 individuals. This information was used throughout the audit to help inform analysis and recommendations. The following charts show the results of our survey.

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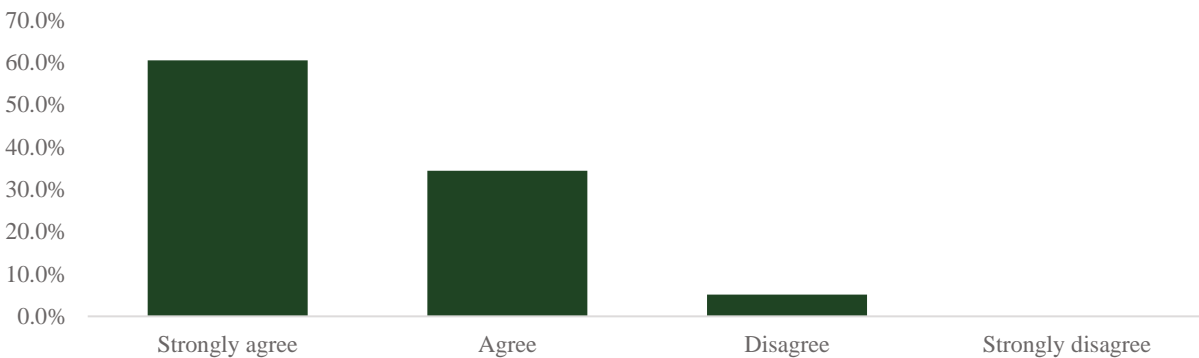
What is your (the survey respondent's) role in your district?



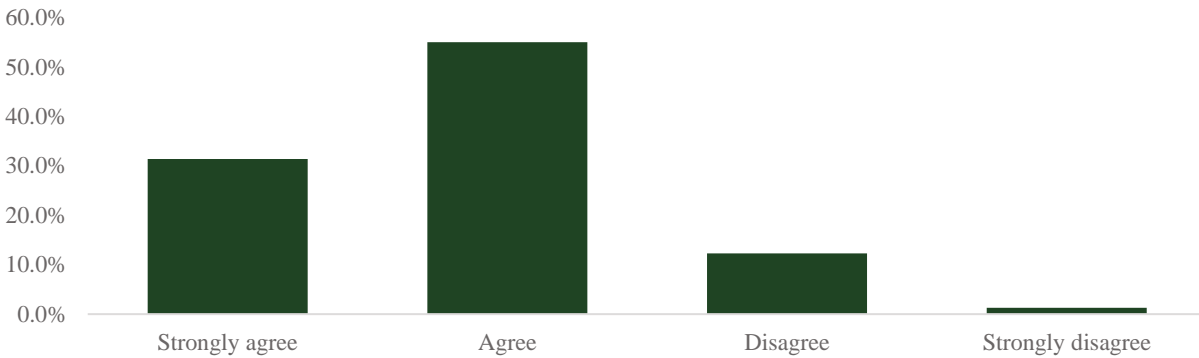
My district management perceives the CCP program as a worthwhile endeavor for the district.



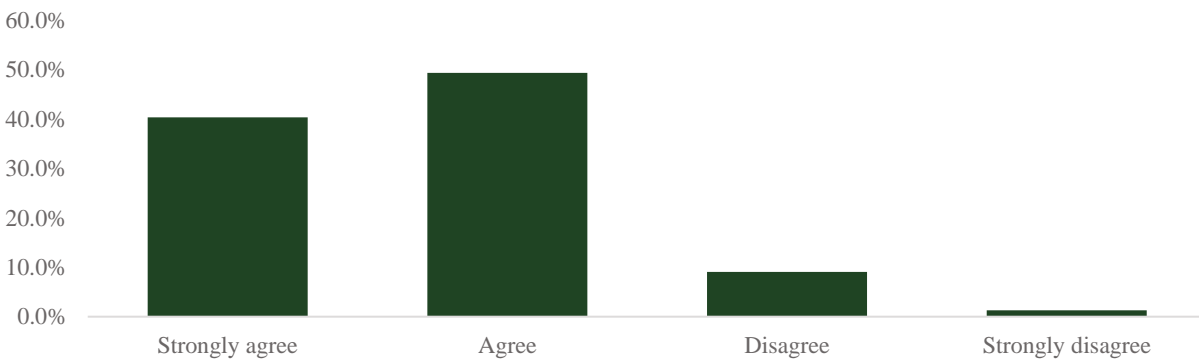
My district management perceives the CCP program as a worthwhile endeavor for the students who participate in it.



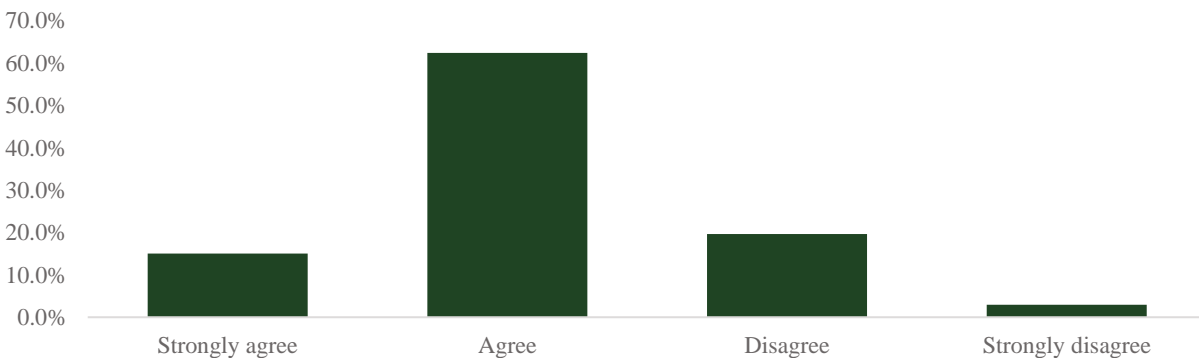
The faculty perceives the CCP program as a worthwhile endeavor for the district.



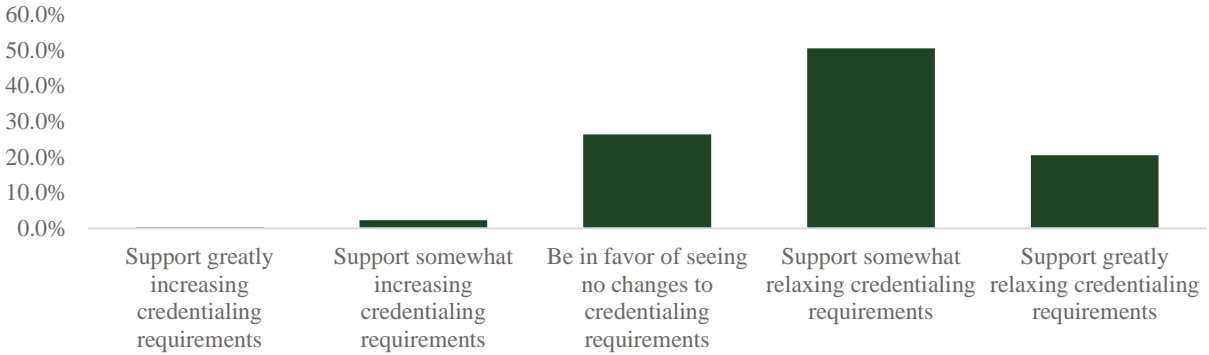
The faculty perceives the CCP program as a worthwhile endeavor for the students who participate in it.



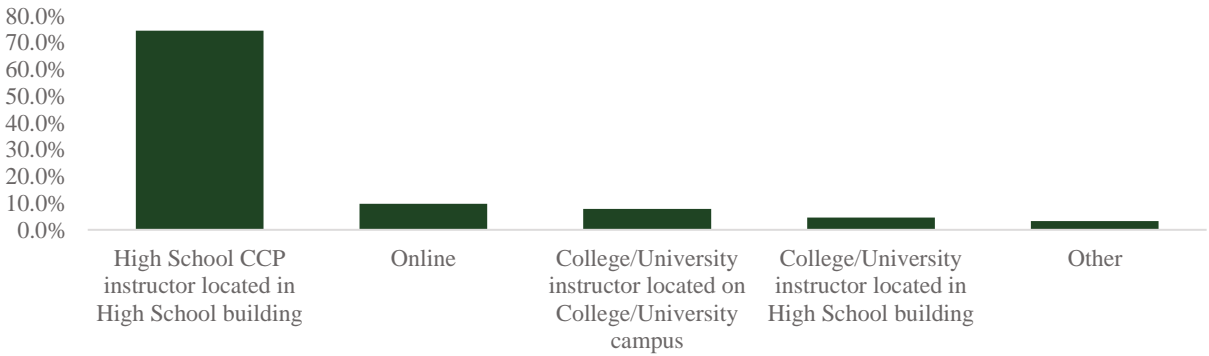
The current level of credentialing required of high school teachers to participate as CCP instructors is adequate.



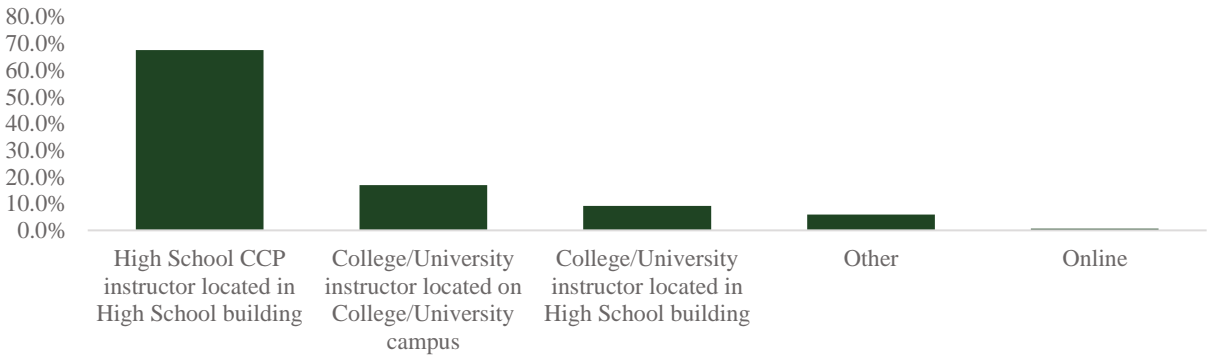
In regard to high school teacher credentialing requirements for CCP courses, my district would:



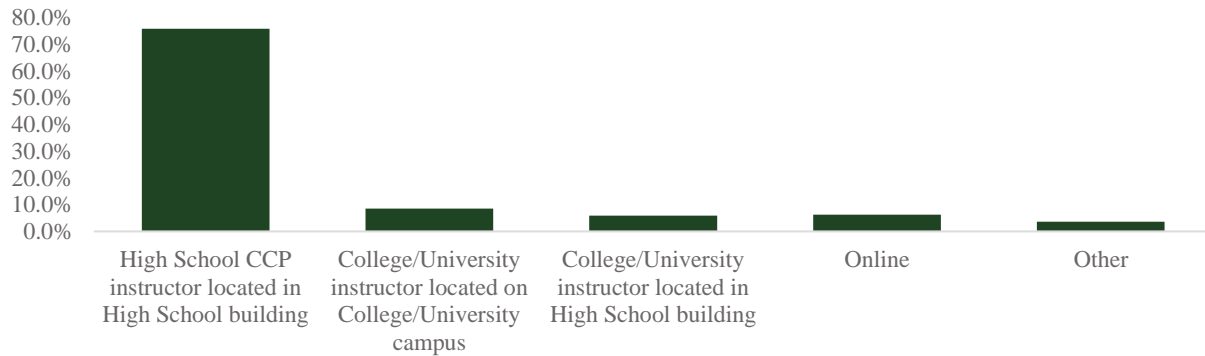
Which of the following modes of delivery for CCP courses do you believe is most cost-effective for your district?



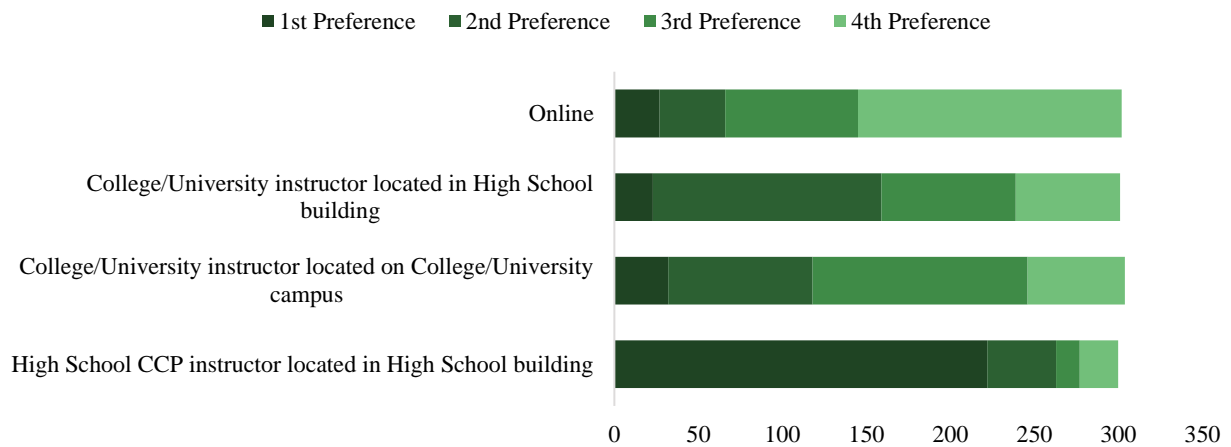
Which of the following modes of delivery for CCP courses do you believe is most effective in terms of quality of instruction?



Which of the following modes of delivery for CCP courses do you believe best meets the needs of your students?

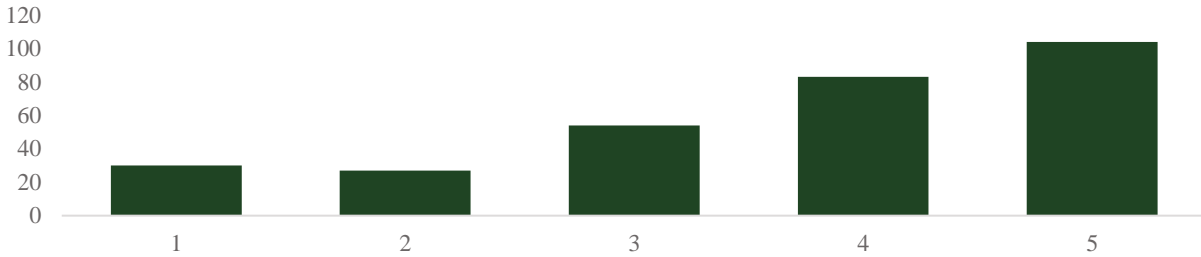


District CCP Delivery Model Preferences

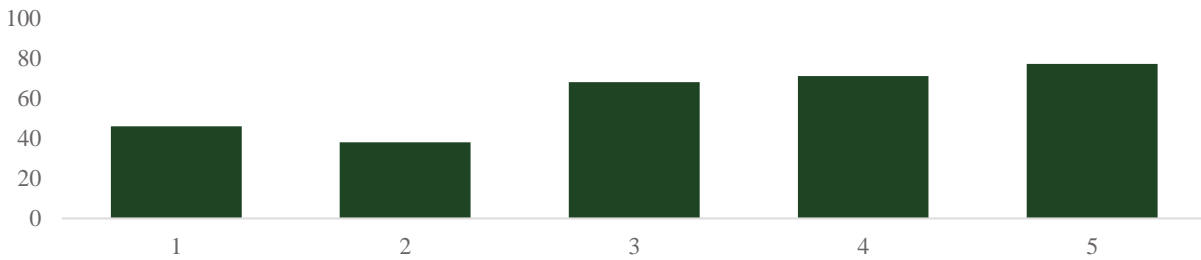


On a scale of 1 to 5, with 1 being very insignificant and 5 being very significant, please rate each of the following on how much of an impact they have on student participation in CCP in your district.

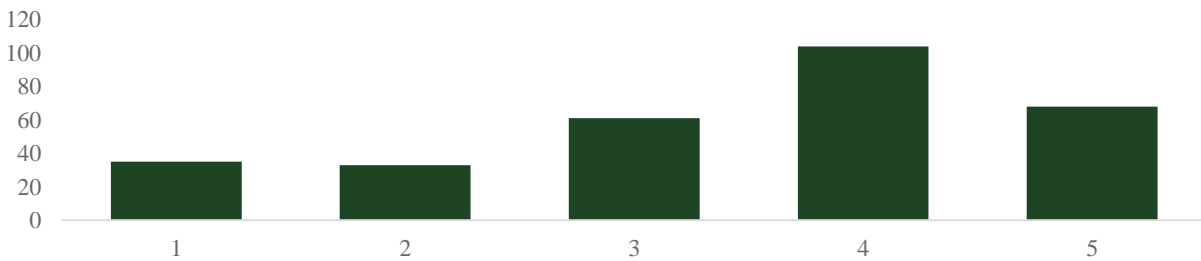
Credentialed Teacher Availability



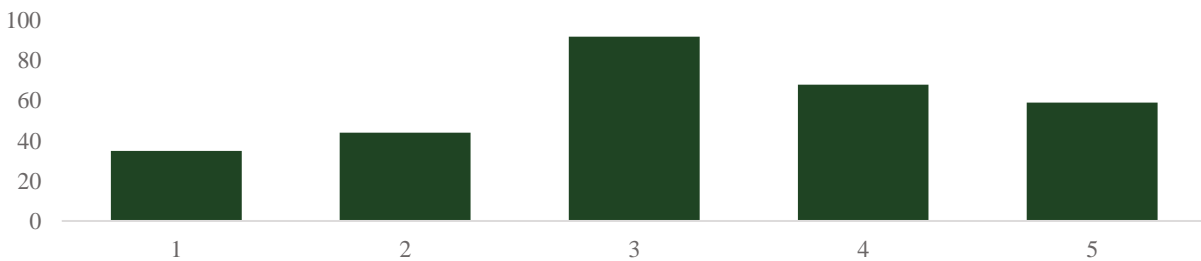
Student Socioeconomics



Courses Offered

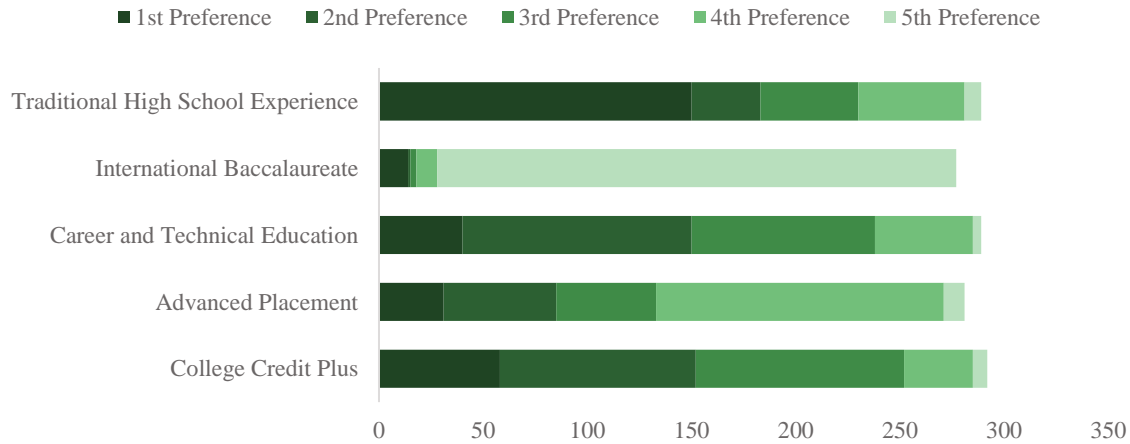


Student Eligibility

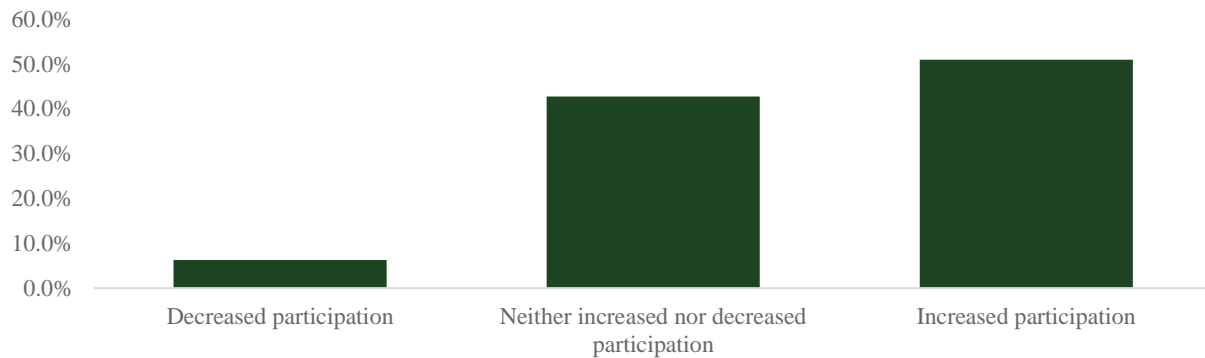


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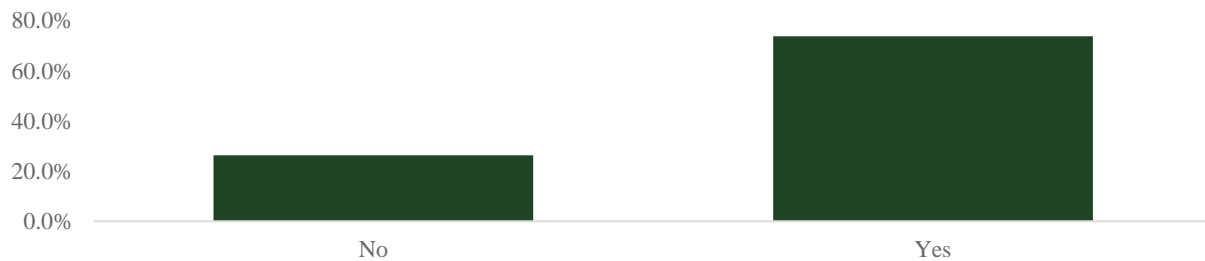
Of the following programs, please rank them in order of how much your district promotes them.



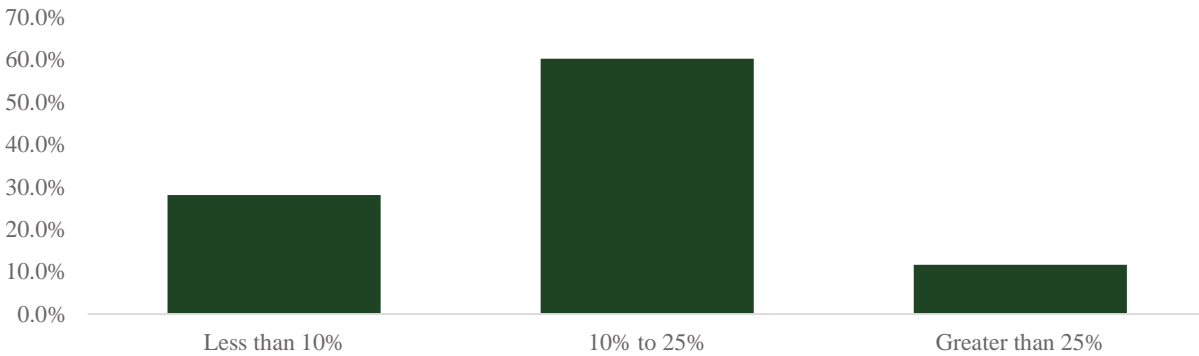
Would you prefer to see increased or decreased CCP participation in your district?



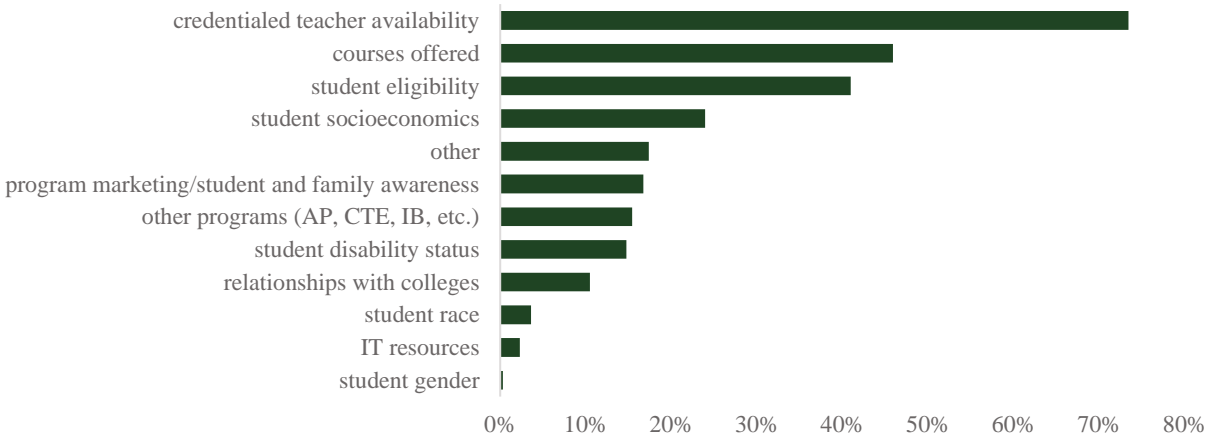
Does your district currently have the capacity to increase participation in CCP?



What level of percentage increase in CCP participation does your district currently have the capacity and resources to implement?



What are the major barriers to growth in capacity for increased CCP participation for your district? (select all that apply)

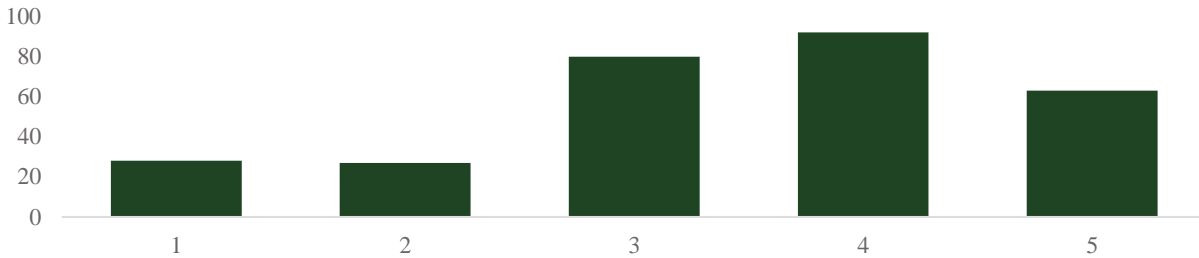


Does your district have a partnership with any specific college or university?

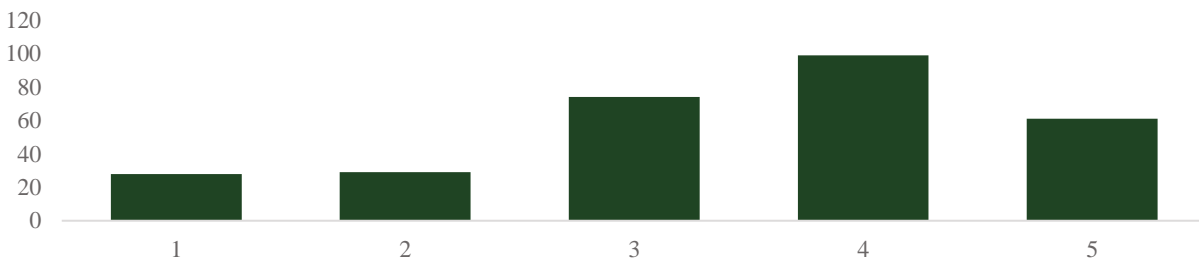


On a scale of 1-5, with 1 being very insignificant and 5 being very significant, to what degree does that partnership contribute to the following?

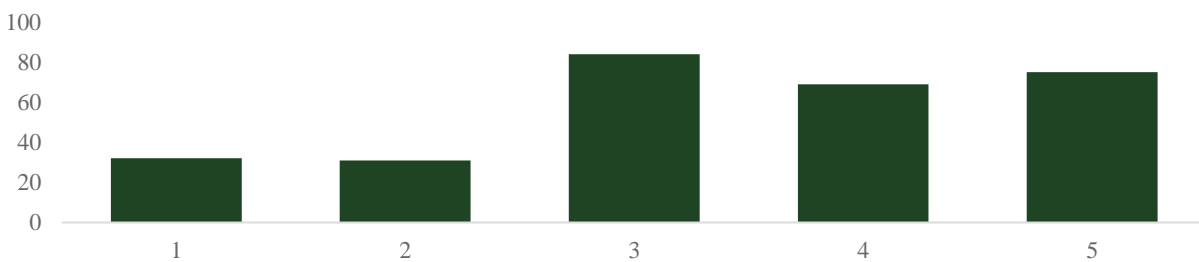
Increased Participation



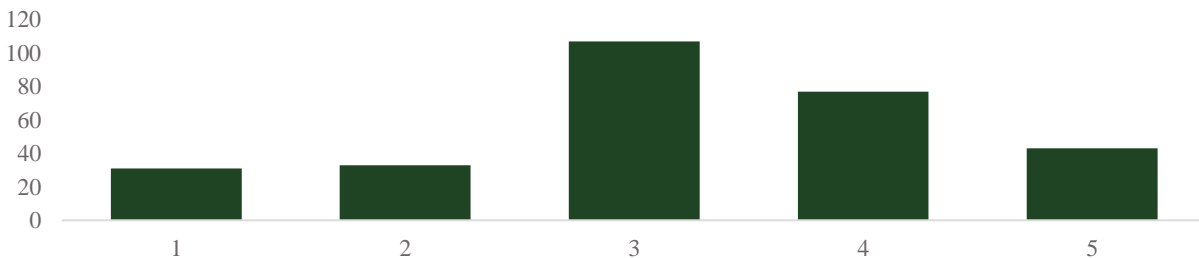
Student Success



Financial Savings/Cost Effectiveness

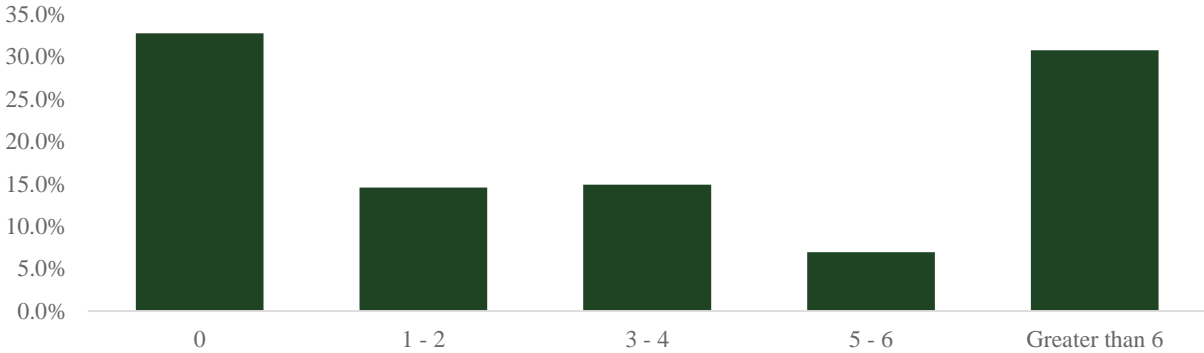


Program Promotional Activities/Marketing Effort



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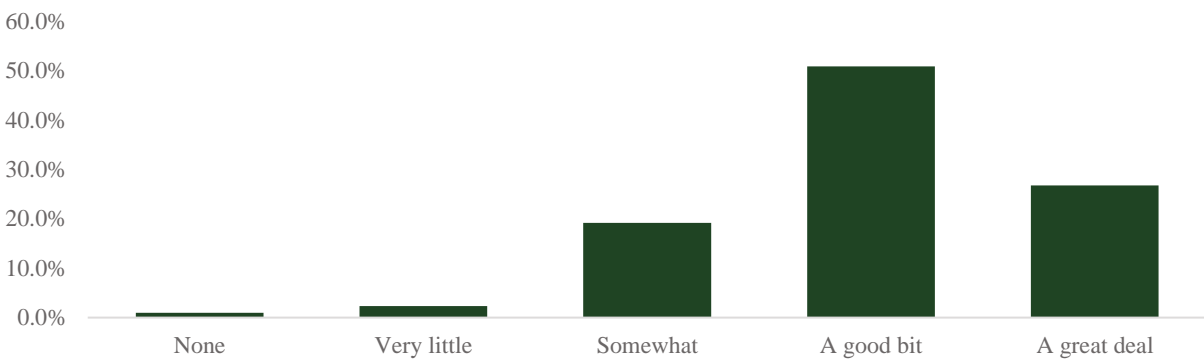
How many Advanced Placement courses is your district offering for the 2021-2022 school year?



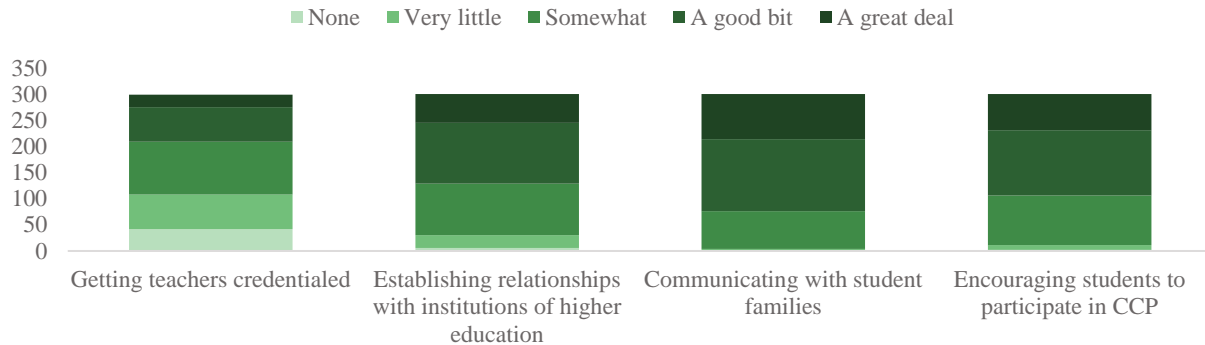
Are AP course grades weighted differently than CCP courses?



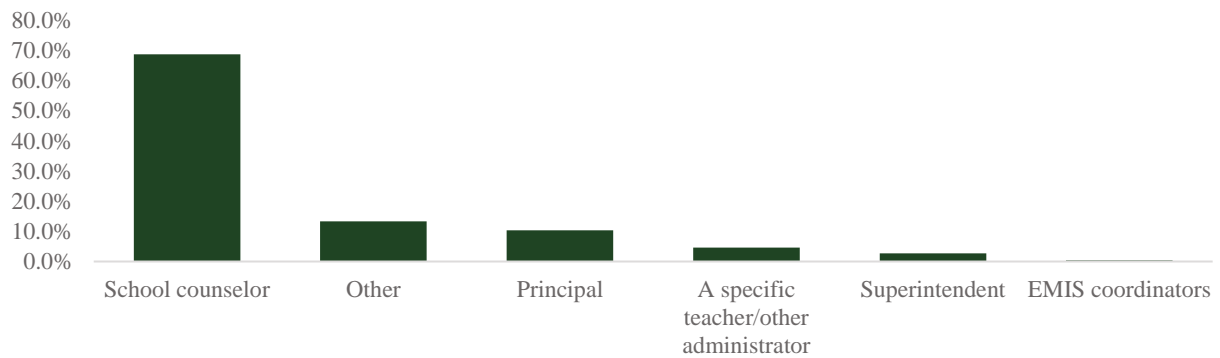
To what degree does your district promote the CCP program?



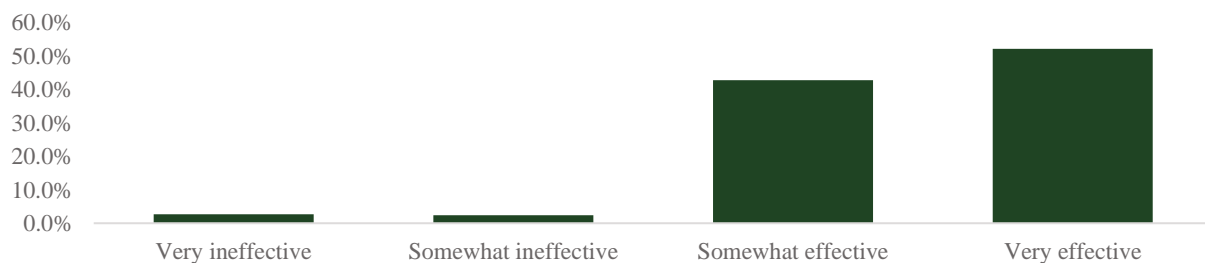
With respect to getting students enrolled in CCP courses, how much effort does your district spend on the following:



What position at your district is primarily responsible for coordinating the CCP program?

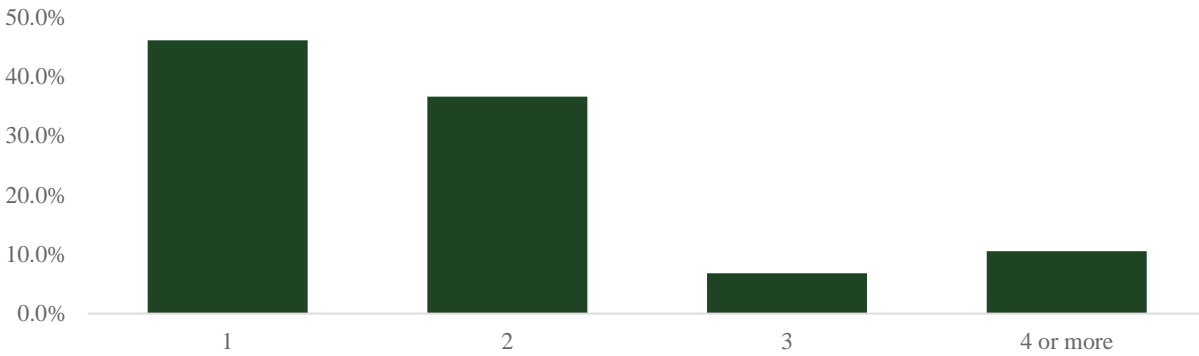


For the position you selected above, please rate their effectiveness at promoting the CCP program in your district.

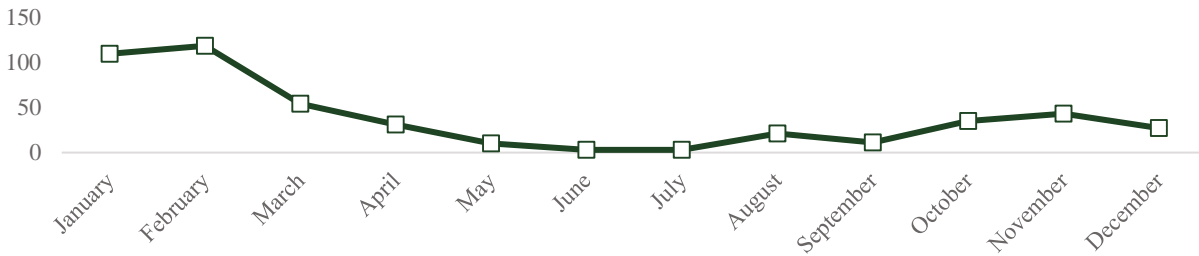


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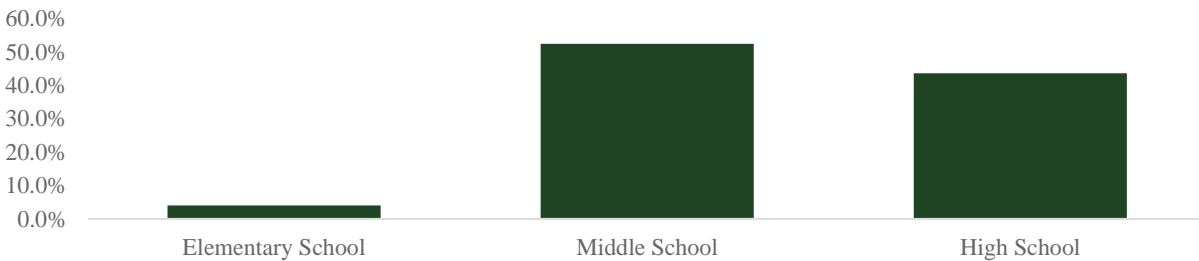
How many information sessions does your district have per year to allow each participating institution of higher education located within thirty miles of your high school(s) to meet with interested students and parents?



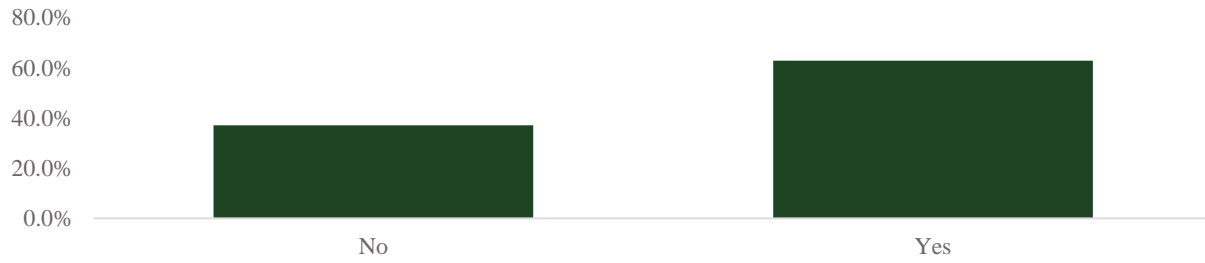
Months that Districts typically hold its CCP information session(s) in:



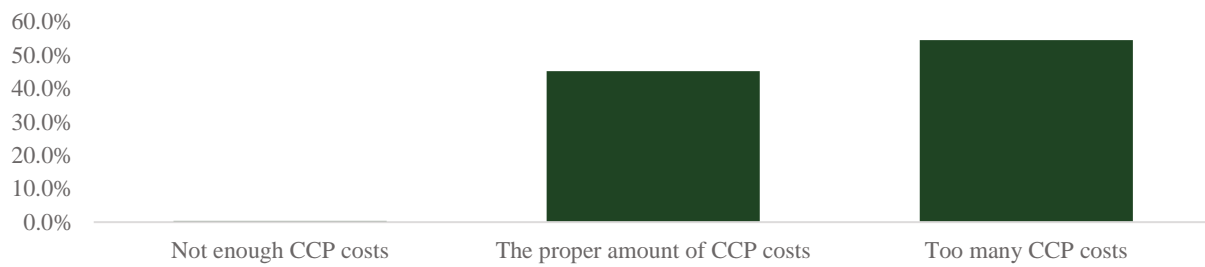
What grade level do you initiate communication with students and families about the CCP program?



Is the CCP program featured on your district's website?



My district is responsible for:



Appendix B: Program Participation

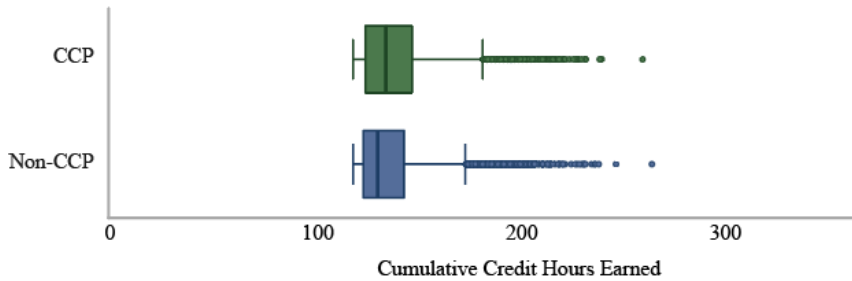
Throughout the report, additional analyses related to program participation were referenced. This appendix provides detail on those data analyses.

Credit Hours at Course Completion

The following charts examine the number of credits earned at the time of college graduation, for bachelor’s and associate degree earners, amongst CCP participants compared to non-CCP participant degree earners that graduated high school between 2016 and 2021. CCP students earning a bachelor’s degree graduated with a median of 136 credits compared to 132 for non-CCP students, which is essentially the equivalent of one extra course. As with the bachelor’s comparison, CCP students earning an associate degree graduated with a similar number of credits as their non-CCP participant peers. CCP participants graduated with a median of 73 credits compared to 69.5 for non-CCP participants, which again, is essentially the equivalent of one extra course. This indicates that generally, credits earned through CCP are not wasted, and therefore, the financial savings achieved in the program by participants and families do not evaporate after matriculation into college.

Total Credit Hours Earned

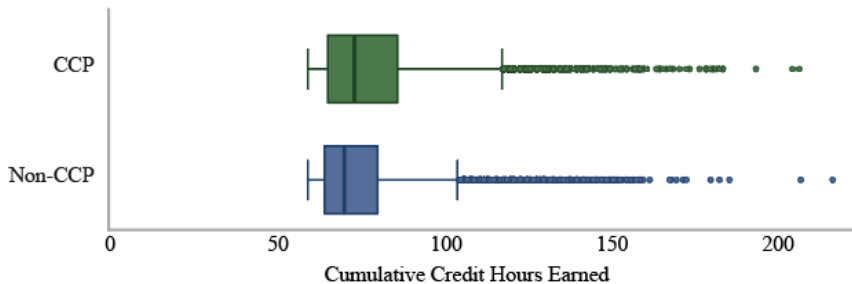
Bachelor’s Degree



This graph shows the total credit hours earned prior to college program completion for both CCP and non-CCP students.

The box in each graph represents the middle 50 percent of students and the line in each box represents the median. The line to the left of the box represents the lowest number of credit hours earned by any student obtaining their respective degree, and the dots to the right of each box represent those individuals that exceeded the normal range.

Associate’s Degree



Notably, for both Bachelors and Associate Degrees, the middle 50 percent was similar for both CCP and non-CCP students.

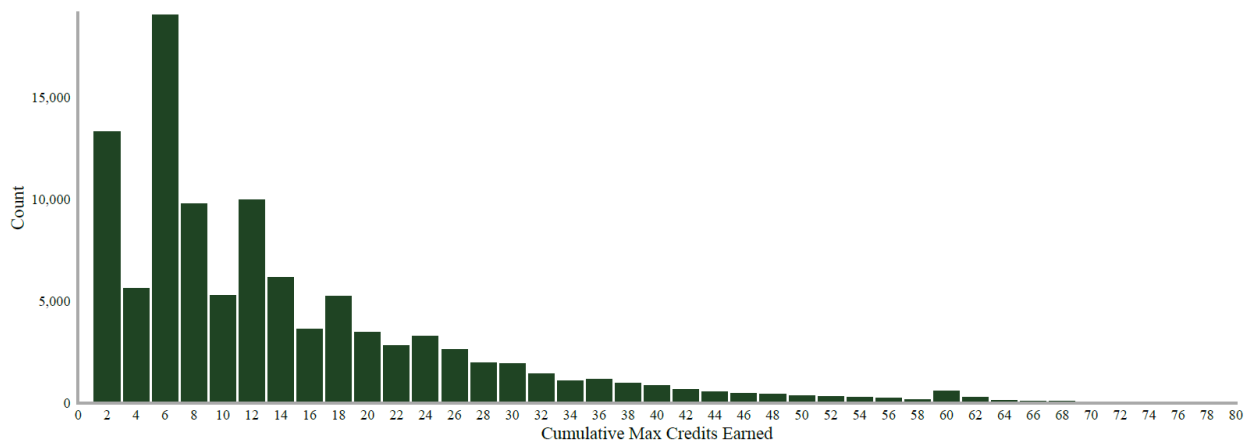
Source: HEI

CCP Credit Hours Earned In High School

Students participate in CCP to varying degrees, with some students taking one or two courses in college and others earning enough credits to obtain a degree while still in high school. We reviewed the number of credit hours earned by students at the time of their high school graduation to determine the average hours earned by students.

The chart below shows the distribution of the frequency of credit hour totals individual CCP students earn at the time of high school graduation for those that graduated from high school between 2016 and 2021. The majority of students earned at least 6 credit hours with the average student earning approximately 14 credit hours. The average is higher because some students earn far more than 6 credit hours with one student accumulating 162 total credit hours prior to high school graduation.

High School CCP Credit Hour Utilization



Source: HEI

Note: Includes only those students that graduated high school and went on to college.

Note: A limited number of students earned more credits than the chart limit shows. The maximum amount of credit hours earned by a student was 162.

Average Cost Savings for Participating Students

One of the major benefits of participation in CCP is the reduction in credits necessary to complete a post-secondary program. The following table illustrates the estimated financial impact of participation in the program for students and their families. We estimate that on average, a CCP student earns approximately 14 credit hours in the program, and saves roughly \$4,400 in tuition, course fee, and textbook cost avoidance. The bottom half of the table shows how savings amounts apply based on program utilization. The top quartile of program users save an average of roughly \$11,800.

Average CCP Student Savings

	Credit Hours	Per Credit Hr Tuition + Fee Avoidance	Tuition + Fees Savings for Avg CCP Student	Average Textbook Savings	Total Savings
	13.785	\$287.86	\$3,968.15	\$400	\$4,368.15

Average CCP Student Savings by Quartile

	Credit Hours	Per Credit Hr Tuition + Fee Avoidance	Tuition + Fees Savings for Avg CCP Student	Average Textbook Savings	Total Savings
0-25%	4.13	\$287.86	\$1,188.86	\$100	\$1,288.86
25-50%	8.955	\$287.86	\$2,577.79	\$200	\$2,777.79
50-75%	14.98	\$287.86	\$4,312.14	\$400	\$4,712.14
75-100%	36.40	\$287.86	\$10,479.06	\$1,200	\$11,679.06

Source: HEI and ODHE

Note: Savings are based on the average instructional fee amongst public colleges and universities in Ohio plus average general course fees. Textbook savings were estimated at \$100 per textbook based on data provided by the OACC. For this analysis, we assumed three credit hours per course, and one textbook per course.

Recommendation 1 Supplemental Information

Based on our analyses, ensuring districts properly promote the CCP program will result in higher participation levels amongst eligible students. The following tables are the results from our survey and various analyses.

Standard Forms

ODHE provides forms on its website related to CCP enrollment that can be used by districts. Districts are able to edit these forms, which can cause confusion, particularly in relation to who is financially responsible for paying CCP fees. The following documents show both the standard form and ways in which individual districts have made alterations.



ANNUAL NOTICE TEMPLATE

The attached document is provided as a **template** for secondary schools to create an **Annual Notice** document. A school can create its own form or modify this form.

INSTRUCTIONS FOR USE:

1. Remove the text box and “[INSERT SCHOOL LOGO]” and replace with your school’s logo. You can also choose to omit this and not use a logo.
2. In various sections, replace “[**insert School District name**]” with your district’s school name. Additionally, replace other areas that include instructions or choices of words inside the “[].” Follow the instructions to make the appropriate choices.
3. For any information that you may need additional assistance with, refer to the [Professionals’ Resource Guide](#) on the College Credit Plus webpage.
4. Delete this first page when ready to save or print the Annual Notice document.

[INSERT SCHOOL LOGO]



Annual Notice for 2022-2023 School Year

This document provides notice of the College Credit Plus program to [insert School District name] students in grades 6 through 11 and their parents by February 1. This information will be posted on the school's website, and written communications including those generally distributed to students, course booklet, student assembly, or information night.

College Credit Plus Costs:

- (a) College Credit Plus opportunities have no cost to students, including the free option to attend public institutions of higher education. School districts have the option to seek reimbursement for the tuition the district has paid to the college on behalf of the student if the student receives a non-passing grade or withdraws after the no-fault deadline date.
- (b) There is potential cost of participation with a nonpublic/private institution of higher education. Private colleges/universities have the option of charging a minimal fee to students.
- (c) Students who are economically disadvantaged who choose to attend a nonpublic institution of higher education cannot be charged a minimum fee.
- (d) [insert School District name] [is or is not] a nonpublic/private school. For students attending nonpublic/private secondary schools, students must apply for state funding to participate and this funding may be limited for students.¹

(ii) Criteria for student participation, including, but not limited to, the following:

- (a) Parents and students must participate in a counseling session prior to participation (which may be included as part of the Information Session).

(b) Important Notice:

"Students must submit a **written notice of their intent to participate** in the upcoming academic year, by **April 1**, in accordance with section 3365.03 of the Revised Code, but may submit the written notice of intent to participate as early as February 15. Students desiring to participate in College Credit Plus in the summer are strongly encouraged to submit letters of intent and begin the admissions process starting in February and prior to the April 1 notice of intent deadline in order to improve chances of meeting summer registration timelines."

For students attending nonpublic/private secondary schools, students must submit their intent to participate within the funding application.

¹ See <https://www.ohiohighered.org/ccp/students-families> for funding application deadline, information, and links.

Appeal Options when missing the April 1 deadline:

Any student who fails to provide the notification by the required date may not participate in the program during the following school year without the written consent of the principal, or equivalent. If a student seeks consent from the principal after failing to provide notification by the required date (April 1), the principal shall notify the Ohio Department of Education of the student's intent to participate within 10 days of the date on which the student seeks consent. If the principal does not provide written consent, the student may appeal the principal's decision to the district superintendent. Not later than 30 days after the notification of the appeal, the district superintendent or governing entity shall hear the appeal and shall make a decision to either grant or deny that student's participation in the program. The decision of the district superintendent or governing entity shall be final.²

There is no appeal for missing the April 1 deadline for students attending nonpublic/private secondary schools or homeschooled students.

(iii) Student participation options:

(a) Secondary schools cannot limit a student's participation in the College Credit Plus program to only the courses offered in that school and students may also participate online or at any other participating institution of higher education, or any combination thereof.

(b) Participating students may be concurrently enrolled in multiple postsecondary institutions and may take postsecondary courses from more than one institution of higher education, concurrently.

(c) List of courses offered at the secondary school through an agreement with an institution of higher education. **[Secondary school must attach list of courses here or after last page of this document.]**

(d) Students should review the course catalog of an institution of higher education for a full listing of course offerings by the institution.

(e) At **[insert School District name]** students **[do or do not]**³ have the option to participate in the College Credit Plus program at the high school. Students can also participate online or at an institution of higher education.

(f) Students have the opportunity to participate during the summer term. For any student participating in a summer term that transfers to a new secondary school, **the student has the responsibility to notify the institution of higher education and the student's prior and new secondary school of such transfer.**

Deadlines:

April 1, 2022 Letter of Intent form is due

April 1, 2022 Funding application and Intent form are due for nonpublic/private school students

[Secondary school should list all deadlines here such as dates of Information Sessions, pertinent dates of partnering college/university, etc.]

(iv) **[insert Name of Secondary School Point of Contact]** is the designated point of contact for College Credit Plus and will answer questions of students and parents and the community regarding the program's operation and will act as a liaison to the state of Ohio to monitor future changes or amendments to the program.

² See [Ohio Revised Code 3365.03](#) for additional details.

³ The secondary school should indicate if the school does or does not offer college courses within the school building.

**INTENT TO PARTICIPATE IN COLLEGE CREDIT PLUS
ACADEMIC YEAR 2022-2023: PUBLIC SCHOOLS**

Date <i>After April 1, you will need permission from the school principal to participate.</i>	
School Name	
Student Name	
Student Grade Level 2022-2023	
Parent/Guardian Name	
Home Address	
Parent Phone Number	
Parent Email Address	
Student Phone Number	
Student Email Address	

DECLARATION OF INTENT

I would like to declare my intent to participate in the College Credit Plus program. I understand that signing this form does not require that I participate during the upcoming school year, and I may decide not to participate without consequence.

I also understand that it is my responsibility to notify my school if I do not gain admission to my selected institution of higher education or choose not to participate in the program.

In addition, I certify that I have received counseling about the College Credit Plus program concerning the rules and regulations for both my school and the college, and that I understand my responsibilities, the benefits and possible risks of participating in the College Credit Plus program.

Please sign and return this form to the secondary school by **April 1**.

Parent Signature _____

Student Signature _____

Date _____



Options for Enrollment in College Credit Plus

Effective May 10, 2021

Ohio Revised Code section 3365.06 provides two options for College Credit Plus enrollment. Based on the order in which the options are listed within the statute, these are commonly referred to as “Option A” and “Option B.” This summary sheet describes the two options available for College Credit Plus enrollment, payment, and credit earned.

College Credit Plus (CCP) “Option A”:

A student can choose to self-pay for tuition and costs of all textbooks, materials, and fees associated with a course under Option A.

- The student must meet the CCP eligibility and college admission requirements and choose to take courses that are allowable under CCP.
- A student must choose this option before the college’s census date (usually 14 days after the start of term) by doing the following:
 - Student must notify the high school of the choice of Option A and the choice of receiving both high school and college credits or only college credit.
 - The credit received will be recorded on both the high school and college transcripts or college transcript only.
 - Student must notify the college to arrange for payment.
 - Student is not able to change options after the census date.
 - Student is billed directly by the college at the standard tuition rate, fees, and costs of textbooks.

Under no circumstances are sectarian or remedial courses eligible for CCP Option A or B.¹

College Credit Plus (CCP) “Option B”:

A student can choose to utilize state funds for tuition and costs of all textbooks, materials, and fees associated with the course under Option B.

- The student must meet the CCP eligibility and college admission requirements and choose to take courses that allowable under CCP.

When choosing Option B, a student will automatically receive both high school credit and college credit:

- Option B is the default option for CCP students.
- A student will be automatically enrolled under Option B unless the student notifies the high school and college of the choice of Option A (as described above).
- A nonpublic school or homeschooled student will automatically utilize the state awarded funds under Option B.
 - If a nonpublic school or homeschool student wants to enroll in additional college courses which are partially or fully exceeding the awarded college credit hours, the student can choose Option A and will be responsible for the entire course and cost of textbook(s).

¹ If a student chooses to self-pay for college courses outside of the College Credit Plus program (e.g., to take a sectarian course), the decisions pertaining to awarding credit are between the student, the secondary school, and the college. A student pursuing such options should be mindful that the student is not afforded the rights and protections afforded to students under the College Credit Plus program.



"A Tradition of Excellence"



Corrina Waggy, Principal

Upper Sandusky High School
800 N. Sandusky Avenue
Upper Sandusky, OH 43351

Phone: (419) 294-2308
Fax: (419) 294-6889
www.usevs.org

Fall 2021

Dear Parent/Guardian,

The Upper Sandusky, Carey, Vanlue, Arcadia, and Riverdale School Counseling Departments have set up a virtual College Credit Plus Information session that will need to be viewed by February 1, 2022. A digital College Credit Plus Letter of Intent will need to be completed once you have viewed the session if your student is interested in taking any college courses during the 2022-2023 school year. The Letter of Intent must be completed and submitted by April 1, 2022.

All students in grades 7-12 have the option each year of taking classes at a post-secondary institution while attending classes as a student at Upper Sandusky Schools. Each technical school, college, and university have established their own criteria, which students must meet to be eligible to participate.

We will be sponsoring a virtual two-part session this year. The first half of the presentation will go over the basics of understanding the College Credit Plus program, FAQs, etc. The second half of the presentation will allow parents to see information from several local colleges/universities regarding their specific College Credit Plus programs. Parents of students who are seriously considering this program are **required** to view this virtual presentation or attend an individual counseling session with Mrs. Williams. This presentation can be found on the High School guidance website under College Credit Plus (CCP) or using this link:

<https://www.usevs.org/o/ushs/page/college-credit-plus-ccp>

Please look the information over carefully from Ohio Higher Ed (<https://www.ohiohighered.org/ccp/faqs#a>), and be sure to view the virtual presentation if seriously considering the College Credit Plus program, or attending any of our career centers. Interested parents who would like more information should contact the high school counseling office at 419-294-2308. Per law, it is mandatory to 'attend' an informational meeting or an individual counseling session to participate in college courses for the upcoming school year.

I am looking forward to working with you all!

Sincerely,

Nicole Williams

Mrs. Nicole Williams

High School Counselor

INTENT TO PARTICIPATE IN COLLEGE CREDIT PLUS ACADEMIC YEAR 2022-2023: PUBLIC SCHOOLS

Date <i>After April 1, you will need permission from the school principal to participate.</i>	
School Name	
Student Name	
Student Grade Level 2022-2023	
Parent/Guardian Name	
Home Address	
Parent Phone Number	
Parent Email Address	
Student Phone Number	
Student Email Address	

DECLARATION OF INTENT

I would like to declare my intent to participate in the College Credit Plus program. I understand that signing this form does not require that I participate during the upcoming school year, and I may decide not to participate without consequence.

I also understand that it is my responsibility to notify my school if I do not gain admission to my selected institution of higher education or choose not to participate in the program.

In addition, I certify that I have received counseling about the College Credit Plus program concerning the rules and regulations for both my school and the college, and that I understand my responsibilities, the benefits and possible risks of participating in the College Credit Plus program.

Please sign and return this form to the secondary school by **April 1**.

Parent Signature _____

Student Signature _____

Date _____

Parents, please initial each statement indicating that you have read and understand each.

_____ 1. Athens City Schools will seek reimbursement from the student and family for the amount of state funds paid to the college if he/she does not pass a class or if he/she drops a class after the 14th day of the course

_____ 2. I attended the presentation on December 8, 2021 or I viewed the video of the December 8th presentation.

_____ 3. I understand that my student must report and leave the AHS building at the same time every day of the week, regardless of the days of the week that my student has CC+ classes.

REMEMBER, THIS IS NOT THE APPLICATION FOR COLLEGE CREDIT PLUS. THE STUDENT MUST SECURE AN APPLICATION FROM THE COLLEGE(S) HE/SHE/THEY WISH TO ATTEND.

School District Marketing and Participation Rates

We determine that a district’s marketing of the CCP program impacts overall student participation. Generally, those districts that promote the program and emphasize it have higher levels of participation. The following series of tables show the implications of program promotion and communication efforts on the part of school districts, on CCP participation, based on responses from school districts in our K-12 survey.

CCP Promotion Efforts and Participation Groupings

	Marketing Questions		
	Top	Middle	Bottom
Average # of info sessions	1.7564	1.7375	2.1351
% of respondents...			
Indicating communication was initiated to students and parents prior to High School	67.9%	59.5%	54.8%
Indicating CCP promoted "A great deal" or "A good bit"	83.8%	81.5%	72.0%
Indicating CCP promoted "A great deal"	38.8%	29.6%	16.0%
With CCP "featured" on website	67.5%	61.5%	58.1%
Indicating program marketing/student and family awareness is a major barrier	8.3%	19.5%	17.1%
Indicating CCP promotion ranking "1"	32.9%	17.1%	13.9%

Source: K-12 Survey Respondents and ODE

Note: Top, Middle, Bottom refer to OPT rankings of districts based on the number of CCP credit hours per student (7th through 12th grade).

In the table above, school districts in the bottom third of participation based on their CCP Hours per Student (7th through 12th grade) values had more info sessions than the other groups, indicating the number of info sessions does not have a positive impact on participation. However, there was a clear pattern showing that the top participation group had a higher percentage of districts initiating contact with students prior to high school, which is required by the ORC. There was also a clear pattern showing that the top group had a higher percentage of districts featuring CCP on their website, which is also required by the ORC. Compared to the middle and bottom participation groups, there was a lower proportion of districts in the top participation group that indicated that marketing/student family awareness was a barrier. Also, compared to the middle and bottom groups, the top group had a higher proportion of districts that indicated CCP promotion was the first or second most promoted program amongst the other dual enrollment and advanced standing options.

Communication

Districts that followed ORC and indicated they initiated communication with students prior to high school had a 14.3% higher Average CCP Hours per Student (7th through 12th grade) value.

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When Communication is Initiated	Average of CCP Hours per Student (7th through 12th grade)
Does NOT Follow ORC	0.953
Follows ORC	1.089

Source: K-12 Survey Respondents and ODE

Website Information

Districts responding that they did feature CCP on their website in accordance with the ORC had a 8.82% higher Average of CCP Hours per Student (7th through 12th grade) value.

Featured on Website	Average of CCP Hours per Student (7th through 12th grade)
No	0.9809
Yes	1.0674

Source: K-12 Survey Respondents and ODE

Impact of AP on CCP participation

We also observed relationships between AP participation and the degree to which CCP is promoted by school districts, as well as attitudes and perceptions of the program. When examining districts that responded to the survey, we saw that districts indicating they promoted CCP “Very Little” had a much higher AP enrollment value.

To what degree district promotes CCP	Average AP Enrollment as % of 7th -12th Grade Enrollment
A good bit	13.97%
A great deal	14.45%
Somewhat	15.77%
Very little	46.39%

Source: K-12 Survey Respondents and ODE

When examining all public districts, we see an obvious relationship between AP enrollment and the CCP participation group, as well as a relationship between the number of AP subjects offered at a district and CCP participation. In summary, the regression analysis indicates that higher AP enrollment and AP course offerings correlated to lower CCP participation (see **Recommendation 1**). We also observed relationships between AP participation and the degree to which CCP is promoted by school districts, as well as attitudes and perceptions of the program.

The following table shows the difference between districts and faculty that view CCP as a worthwhile endeavor for either the student or the district. Respondents were asked to give their opinion ranging from Strongly Agree to Strongly Disagree regarding the perception of CCP. These responses were then compared to the student percentage taking AP courses for 7th through 12th grade for each respective district. Districts that had a more positive perception of CCP had

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lower AP utilization while the opposite is true for those districts that hold a negative perception of CCP.

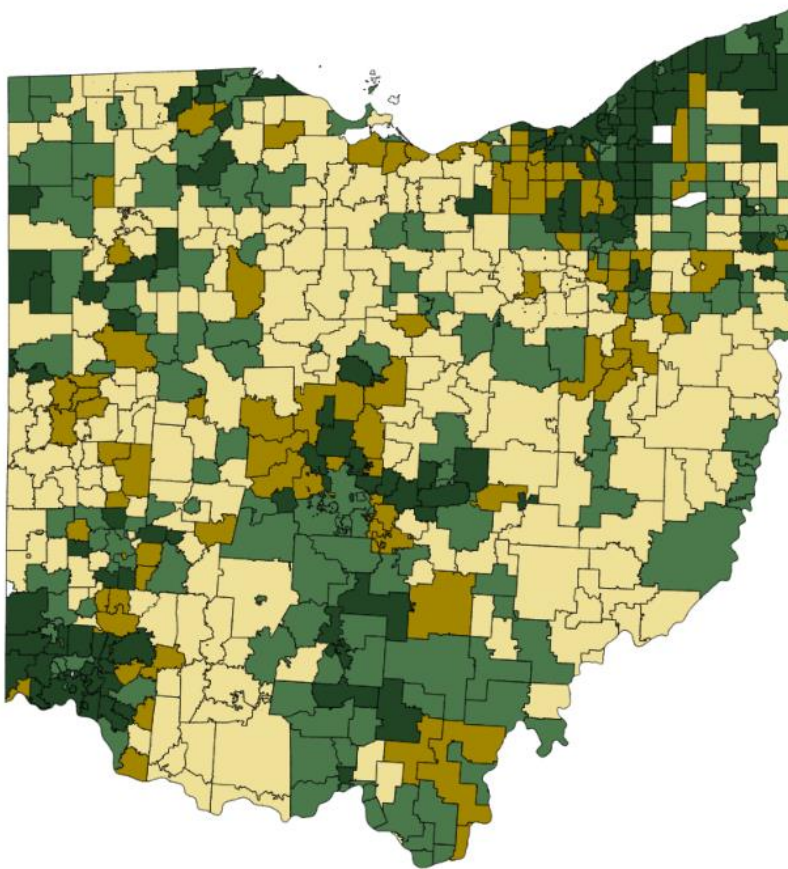
Survey Question	Average Eligible Student Percent In AP			
	Strongly Agree	Agree	Disagree	Strongly Disagree
Faculty Perceive CCP Program as Worthwhile for <i>the District</i>	13.5%	13.6%	20.3%	21.0%
Faculty Perceive CCP Program as Worthwhile for <i>the Student</i>	14.1%	13.7%	19.2%	30.2%
District Management Perceive CCP Program as Worthwhile for <i>the District</i>	17.2%	13.7%	18.6%	17.2%
District Management Perceive CCP Program as Worthwhile for <i>the Student</i>	14.8%	14.2%	17.7%	null

Survey Question	Average Eligible Student Percent In AP			
	Strongly Agree	Agree	Disagree	Strongly Disagree
Faculty Perceive CCP Program as Worthwhile for <i>the District</i>	13.5%	13.6%	20.3%	21.0%
Faculty Perceive CCP Program as Worthwhile for <i>the Student</i>	14.1%	13.7%	19.2%	30.2%
District Management Perceive CCP Program as Worthwhile for <i>the District</i>	17.2%	13.7%	18.6%	17.2%
District Management Perceive CCP Program as Worthwhile for <i>the Student</i>	14.8%	14.2%	17.7%	null

Source: K-12 Survey Respondents and ODE

The following map helps to visualize the relationship between CCP and AP participation in traditional secondary school districts across the state of Ohio. Participation in each program was measured based on total CCP hours per student in 7th through 12th grade, and total AP enrollments per total students in 7th through 12th grade, for each district. Each district was then assigned a percent rank value for each metric- for instance, a percent rank value of 75% for the CCP Hours per student metric means that district's value was higher than 75% of all districts. Those districts with a percent rank higher than .499999 for CCP Hours per student were labeled as "High CCP", and the latter were labeled "Low CCP". Similarly, those districts with a percent rank higher than .499999 for total AP enrollments per total students were labeled as "High AP", and the latter were labeled "Low AP". We then categorized each district according to their respective CCP and AP rankings.

Group Name ● High CCP High AP ● High CCP Low AP ● Low CCP High AP ● Low CCP Low AP



Source: ODE

As shown in the map, there are concentrations of Low CCP-High AP districts around the major cities in Ohio, specifically the suburbs. High CCP districts tend to be in more rural areas in the state.

Recommendation 2 Supplemental Information

To assess current incentive programs in place for school district teachers, we randomly selected 20 school districts from each of the three participation groups, for a total of 60 school districts, and analyzed their collective bargaining agreements (CBA) to find evidence of either a stipend, bonus, or tuition reimbursement for teachers that teach CCP courses.

High School Teacher Credentialing Incentive

Some school districts provide a stipend to teachers that teach CCP courses, or cover tuition for teachers. This varies across the state, however there does appear to be a correlation between the presence of a CCP stipend and the participation level in the program.

Stipend for CCP

Participation Group	No	Yes	% Yes
Top	8	12	60.0%
Mid	14	4	22.2%
Bottom	16	1	5.9%

Source: K-12 CBAs and ODE

While a very high percentage of the sample of districts within the top participation group had some sort of tuition reimbursement, there does not appear to be a solid relationship between the presence of this incentive and CCP participation when looking at all three groups.

Tuition Reimbursement

Participation Group	No	Yes	% Yes
Top	3	17	85.0%
Mid	6	12	66.7%
Bottom	3	14	82.4%

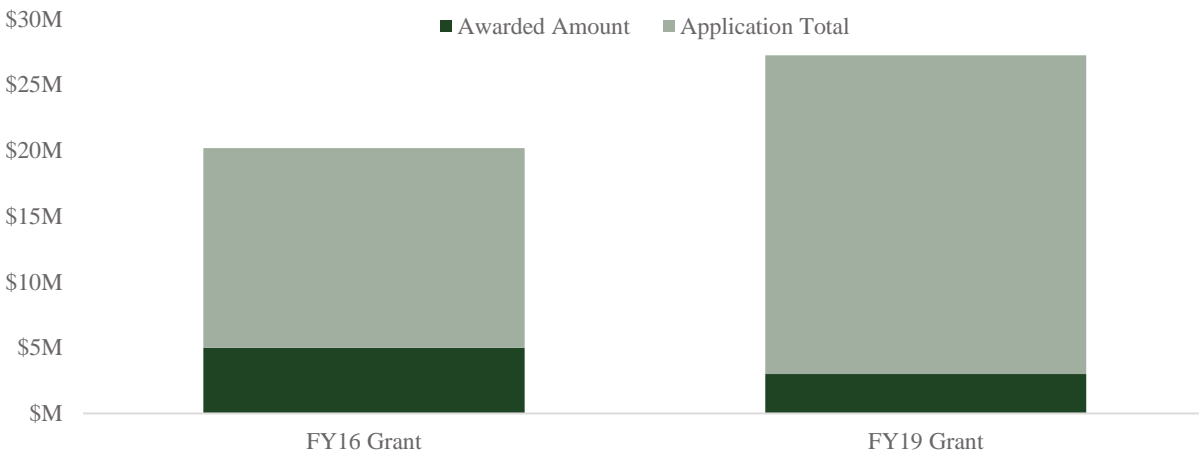
Source: K-12 CBAs and ODE

Recommendation 3 Supplemental Information

CCP Teacher Credentialing Grant

The following chart shows a comparison between the CCP Teacher Credentialing Grant appropriations and the total value of the awards sought by applicants. The grant appropriation amounts were \$5 million in FY 2016 and \$3 million in FY 2019, respectively. However, the volume of grant applications in FY 2019, totaling over \$24 million, relative to the total award amount of \$3 million indicates that the current supply of credentialed teachers does not appear to meet demand.

Application vs Awarded Amounts Teacher Credential Grants



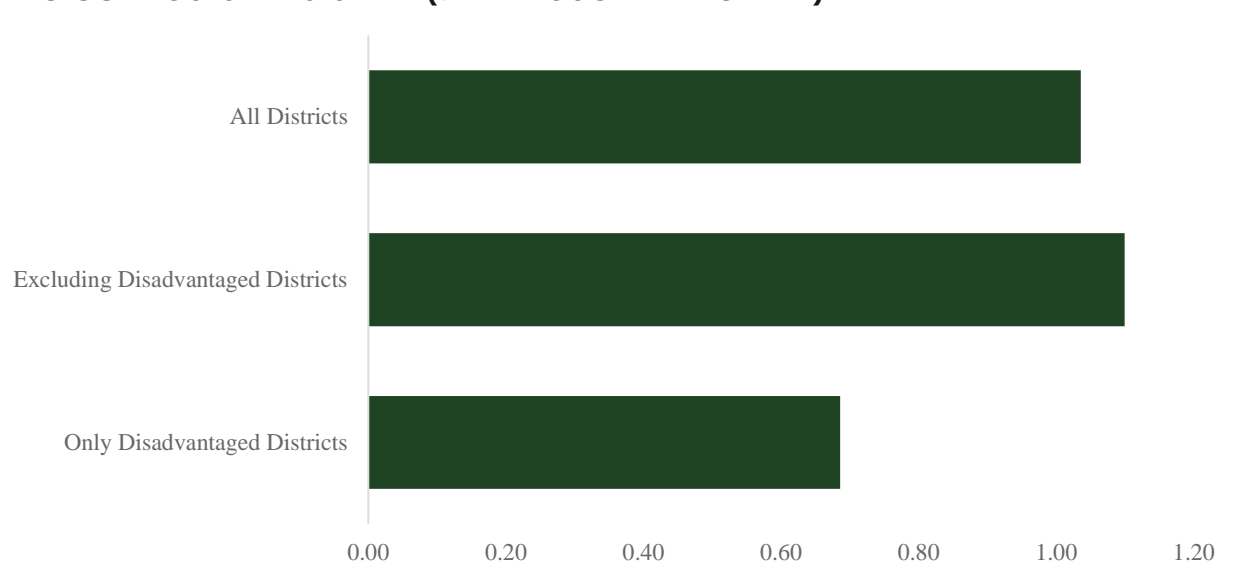
Source: ODE

Recommendation 4 Supplemental Information

Participation Rates for Economically Disadvantaged Students

The following chart illustrates that economically disadvantaged students participate in CCP at a lower rate than their non-disadvantaged peers. See **Recommendation 4** for additional discussion regarding the strategies this audit identified to reduce barriers to program participation for disadvantaged students.

Economically Disadvantaged Participation Comparison
AVG CCP HOURS PER STUDENT (7TH THROUGH 12TH GRADE)

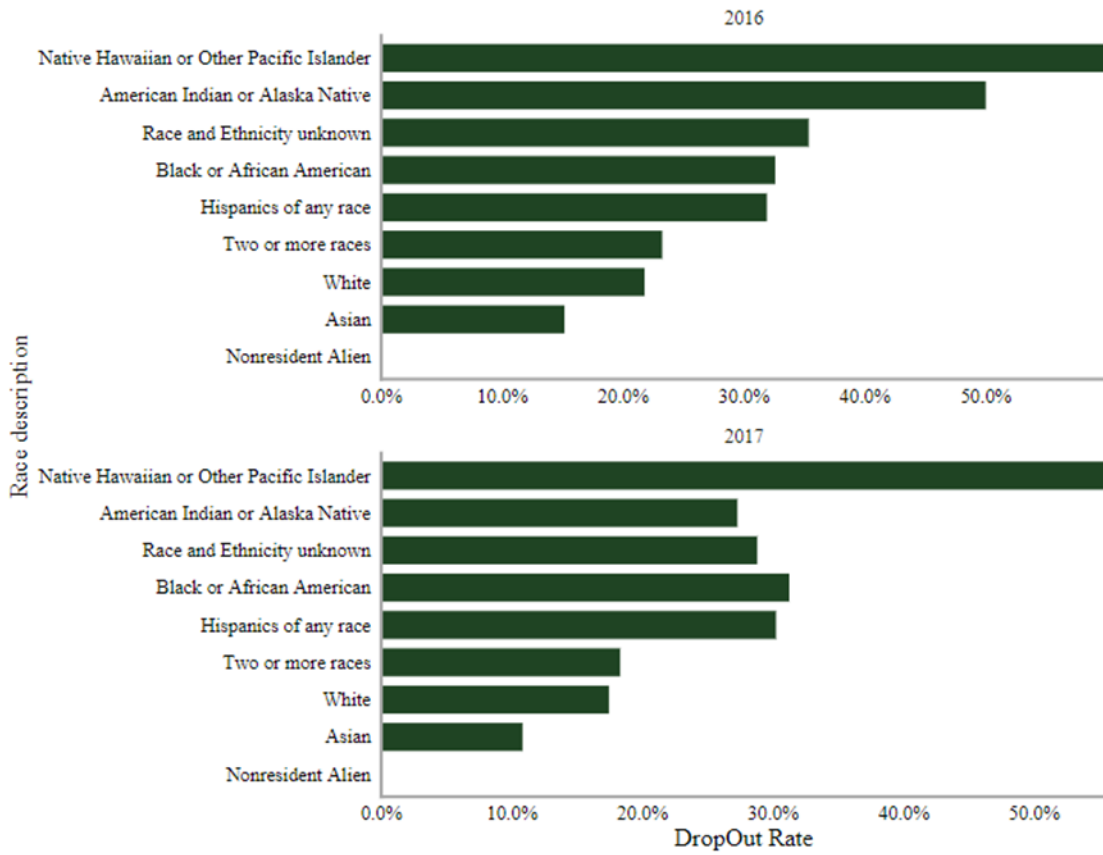


Source: ODE

Positive Impacts of Program Participation

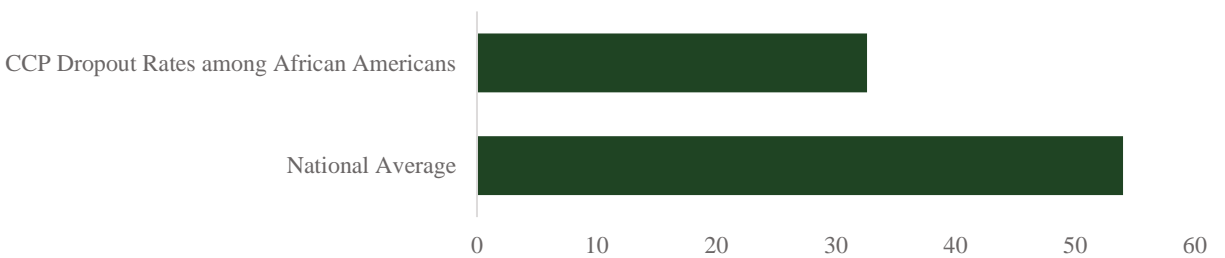
As shown in the **Introduction** section of the report, CCP appears to have a desirable impact on college dropout rates amongst its participants as compared to non-participants. These charts show additional detail regarding college dropout rates as they relate to race, for students graduating high school in the 2016 and 2017 cohorts.

CCP
Dropouts during 2020 and 2021 By Race



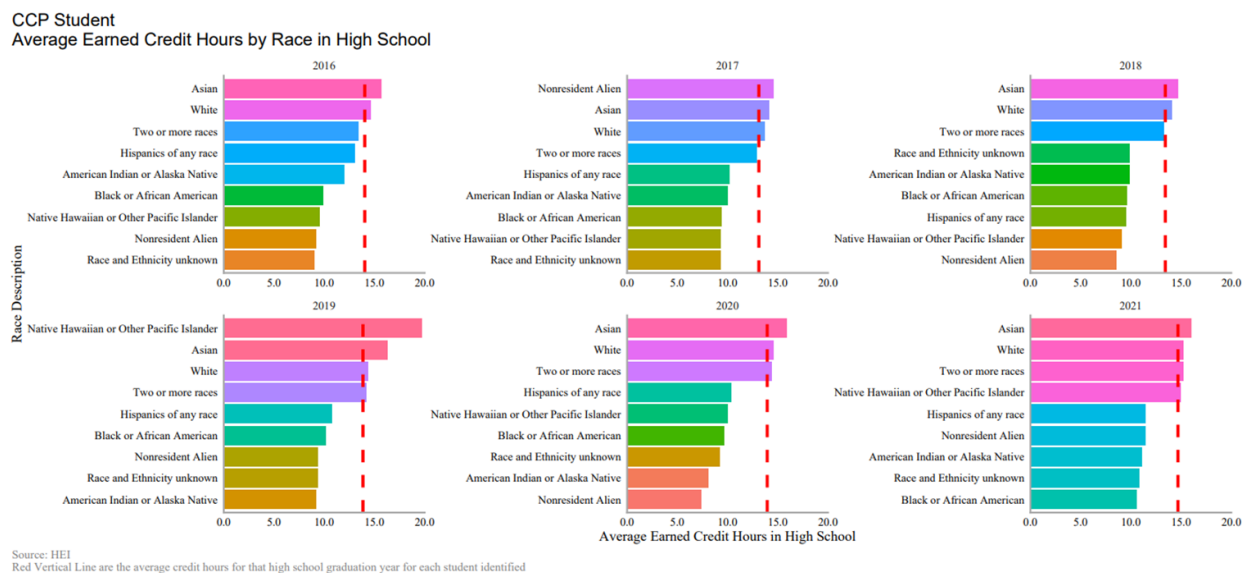
Source: HEI
Dropouts during 2020 and 2021 means a student's hei_person_id could not be identified during those years or earned their degree and left

The chart below shows how the CCP college dropout rate among Black/African American participants compares to the 2022 national rate per *educationdata.org*. CCP participating students in the 2016 high school graduation cohort experienced a college dropout rate of 32.6 percent compared to the national statistic of 54%.



Source: HEI and education.org

The group of charts below demonstrates the degree to which participating students utilized the program in a given year, separated by race. The horizontal bars represent the average credit hours students in that group earned in CCP credits, and the vertical dashed line represents the average number of credits earned for the whole cohort. The charts indicate that Hispanic, Black or African American, and American Indian or Alaskan Native students consistently earn less CCP credit than the average. As discussed in **Recommendation 4**, the overall representation of these minorities is lower than the proportion of each group amongst Ohio students. This shows that the students in these groups that are participating in CCP are doing so to a lesser degree than their peers.



Transportation Services

As discussed in **Recommendation 4**, the absence of transportation services may be a barrier to program participation, particularly amongst underserved student groups. According to the Education Commission of the States in *50-State Comparison: Dual/Concurrent Enrollment Policies* (Apr 2019), several states and the District of Columbia provide some form of support for transportation services for dual enrollment. *Note: Georgia ceased providing transportation support in FY 2019.*

States with Transportation Aid

State	Description
Delaware	The Delaware legislature appropriates funds annually for college access for low income students. This covers dual enrollment tuition, books, and student transportation as needed

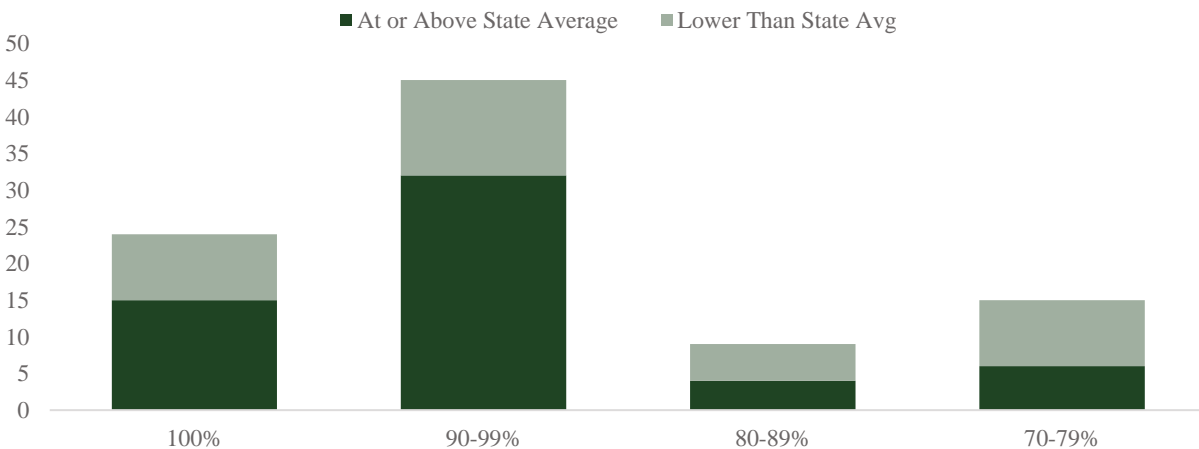
Efficient • Effective • Transparent

Washington DC	Washington DC awards funding to eligible dual enrollment partnerships for tuition, books, fees, and transportation.
Georgia	Georgia used to provide transportation grants, but eliminated them in FY 2019.
Massachusetts	Massachusetts may award financial assistance for books, supplies, and transportation.
Michigan	Transportation fees and parking costs are waived for students in Michigan.
Minnesota	Low-income students can be reimbursed 15 cents a mile in Minnesota.
Vermont	Vermont provides a need-based stipend for financially needy students for books, fees, and transportation.
Washington	Washington's legislation awards funds to support dual credit course offering costs including transportation.

Source: Education Commission of the States

Counseling Services

Districts Grouped by % of Economically Disadvantaged Students in regards to Student to Counselor Ratio



Source: ODE

Recommendation 4 discussed the importance of counseling services to program participation amongst underserved students. This chart illustrates where counseling services may be limited among Ohio's most economically disadvantaged school districts. Of the 93 districts in the State that have economically disadvantaged student populations of 70 percent or greater, 57 have a lower ratio of counselors per 1,000 students than the statewide average of 2.31.

Broadband Internet Access

In order to identify counties which could be targeted with broadband grant funds to positively impact CCP participation in the Online delivery method, we gathered county broadband data and identified the bottom quarter of counties that had 75 percent or less of households with high-speed broadband access.³³ All of the identified counties, as shown below, are set to receive some portion of the grant; eight counties identified have more proposed service area addresses than the statewide county average of 6,105. When normalized on a per household basis, 5 counties have a lower number of proposed service area addresses than the statewide county average of 0.25, which could indicate that these counties are set to receive a proportionately lower share of grant resources relative to the rest of the state. Increasing the high-speed internet access across the state may help minimize the barrier associated with the online course delivery method.

Proposed Broadband Service Area Addresses in Limited Access Counties

County	Households	Households without 25 x 3 Mbps	Total OL Hours	7th-12th Student Enrollment	OL Hours per 7th-12th Student Enrollment	Proposed Service Area Addresses	Proposed Service Area Addresses per Household
Fayette	11,436	75.5%	1,312.9	2,086	0.63	4,552	0.40
Pickaway	19,624	74.8%	2,265.8	4,156	0.55	13,294	0.68
Jackson	13,010	73.6%	622	2,069	0.30	7,972	0.61
Knox	22,607	72.9%	1,871	3,270	0.57	8,329	0.37
Guernsey	16,210	72.6%	1,595	1,932	0.83	6,717	0.41
Gallia	12,062	61.7%	1,311	1,743	0.75	3,242	0.27
Pike	11,012	60.7%	320	1,907	0.17	10,380	0.94
Perry	13,576	59.0%	587	2,487	0.24	9,404	0.69
Hocking	11,369	56.9%	87	1,613	0.05	17,952	1.58
Meigs	9,557	56.5%	626	1,486	0.42	621	0.06
Carroll	11,385	54.7%	1,379	1,281	1.08	1,657	0.15
Morgan	6,034	53.9%	324	833	0.39	725	0.12
Harrison	6,526	51.7%	100	625	0.16	1,804	0.28
Holmes	12,554	51.1%	586	1,527	0.38	261	0.02
Vinton	5,260	31.9%	95.5	838	0.11	787	0.15
Monroe	6,065	28.7%	429	956	0.45	7,649	1.26

Source: Broadband Ohio, ODE, and connectednation.org

³³ Data is from connectednation.org.

Appendix C: Program Operations

The table below lists a number of key variables found to have significant relationships to CCP participation based on the results of regression analysis. We utilized the CCP Hours per Student (7th through 12th grade) metric against several data variables that were pulled from various sources such as the District Profile Report from FY 2020 (commonly referred to as the Cupp-Patterson Report), the 2021 District Grad Rate report, the 2020-21 Achievement District report, and the ODE FY 2019, FY 2020, and FY 2021 CCP school deduction summaries.

The variables in the table are listed in descending order of the significance of the observed relationship. On the left are the variables with a positive relationship to CCP participation, meaning as that value increases, so does CCP Hours per Student (7th through 12th grade). Negative variables are the opposite, and are shown in the right-hand column.

Positive Correlation Variables	Negative Correlation Variables
Attendance Rate	Pupil Density
White Students as a % of Total	% Students with Disability
Assessed Pupil Valuation	% of Disadvantaged Students
% of students with 5+ credits in Eng LA, Math, Science, SS, Language, Fine Arts after 9th Grade	Pupil Support Expenditures
Local Tax Effort	% Students Taking AP Course
Average Years Teacher Experience	Teacher FTEs
	Average Enrollment
	FY20 Black Students As Percent Of Total
	FY20 Percent Of Students With Limited English Proficiency
	FY20 School Psychologists/1000 Students
	Colleges within 10 miles
	FY20 Federal Revenue per Pupil
	FY20 Teacher Average Salary
	FY20 Instructional Expenditure per Pupil
	Fy20 Pupil Administrator Ratio
	FY20 State Revenue per Pupil

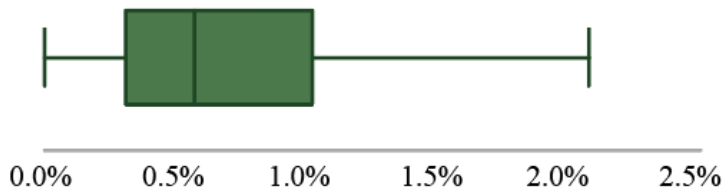
Source: ODE

Recommendation 9 Supplemental Information

CCP Impact on Foundation Funding

The following chart demonstrates the marginal impact that CCP deductions have on district revenue levels. As shown, CCP deductions make up an average of less than one percent of all state revenue for each district.

CCP Cost as a Percent of Total School District State Revenue



This box plot shows that the middle 50 percent of districts have less than one percent of state revenue deducted for CCP fees, indicating that the program does not significantly impact the overall budget of a district.

Source: ODE

CCP Fee vs Standard Tuition Revenue

This chart shows the difference in revenue received from public colleges and universities through CCP compared to the revenue they would otherwise receive through traditional student enrollment at their respective standard rates.

Public IHE FY21 Estimated Revenue Loss



Source: ODE and ODHE

OHIO AUDITOR OF STATE KEITH FABER



OHIO DEPARTMENT OF HIGHER EDUCATION

FRANKLIN COUNTY

AUDITOR OF STATE OF OHIO CERTIFICATION

This is a true and correct copy of the report, which is required to be filed pursuant to Section 117.26, Revised Code, and which is filed in the Office of the Ohio Auditor of State in Columbus, Ohio.



Certified for Release 8/16/2022

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Phone: 614-466-4514 or 800-282-0370

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