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*President*

**Testimony of  
Todd Diacon  
President, Kent State University**

**Ohio House Education Committee  
House Bill 62  
Opponent Testimony**

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Chairwoman Fowler Arthur and members of the House Education Committee: thank you for the opportunity to provide opponent testimony on behalf of Kent State University on House Bill 62, which makes changes to Ohio's College Credit Plus program.

My name is Todd Diacon and I am the 13th president of Kent State University, the state's 3rd largest 4-year institution. Each year we graduate more than 8,500 students, and nearly 80% of them remain in Ohio to live their lives, build families and to contribute to our great state.

House Bill 62 contains four significant changes to the College Credit Plus (CCP) program, all which have impacts for colleges and universities. The first change simply requires colleges participating in CCP to provide notice to a student's school if the student withdraws from a CCP course. This is a good policy, as no one wants to see students risk graduation or athletic eligibility because their courseload was reduced without their school knowing. Kent State University supports this provision, and in fact we already notify schools when a CCP student withdraws from a class. We believe this is a best practice, and have no issue with it becoming law.

The other changes to the College Credit Plus program in House Bill 62 concern us. The provision of the bill that changes the purchasing model for textbooks is problematic for

several reasons. Kent State University, along with many other public institutions, no longer operates our on-campus bookstores. Through a contract with Barnes and Noble, Kent State students and CCP students taking KSU classes order their textbooks directly through Barnes and Noble. The university has no role in ordering, stocking, selling, or warehousing textbooks. Under the bill, if an instructor chooses to use a purchase-only textbook when a free textbook could be used, the university must pay for and provide the purchase-only text. Yet, if the university were required to purchase a textbook for a CCP student, the university would own that text, meaning that we would not only have to warehouse hard copies and maintain an inventory solely for CCP courses, but we would also need a mechanism to first provide students with the textbooks and then collect the textbooks from students at the conclusion of the semester. This becomes significantly more difficult knowing that students take Kent State courses from as far as a five-hour drive from a Kent State campus. Indeed, for classes taken through either the “online” or “taught by a credentialled high school teacher” delivery model, it is entirely possible for a CCP student to never physically interact with the university. How, then, would we both deliver and then collect the hard copy textbooks from CCP students?

We heard during proponent testimony that secondary school districts do not collect textbooks and that they become the student’s property. I will not pretend to understand why some secondary schools are not collecting textbooks from students at the conclusion of courses, but that seems to be a less-than-ideal business practice.

The second problematic issue with the textbook language in the bill would have us cost-share with secondary schools if there are no “open-source materials that may be used in lieu of purchase-only textbooks.” Under this proposal, who would decide if there were an open-source textbook for the course?

Currently, course instructors select the textbooks they deem appropriate for the course. Under the bill, if a professor reviewed an open-source text that *could* be offered to students for free, but did not deem it appropriate, would the university need to pay for the textbook that the professor assigns when a high school administrator declares that an open-source text *could have* been used? If this provision were enacted in the 2024-2025 school year, it would have cost Kent State University as much as \$316,000.

We heard during proponent testimony that CCP creates uncertainty in budgeting for secondary schools. We agree and we share that concern. Both secondary and post-secondary institutions are required to participate in CCP. Any uncertainty that exists under the current model will *not* be alleviated under House Bill 62, *it will only shift* that uncertainty to colleges and universities.

Additionally, the textbook language requires institutions to endeavor to use open-source materials in courses with CCP students. This is problematic because College Credit Plus requires that a vast number of courses be available to high school students. Instructors prepare their courses and course material in advance of knowing if they have CCP students enrolled in the course. This language is unworkable.

I will note for the committee that Kent State University is lowering the cost of textbooks for all our students. For example, our Flash Books digital course materials program provides significant discounts to over 18,000 students, including those in CCP. Flash Books saved students over \$2.7 million in the 2023-24 academic year.

The last changes to College Credit Plus in House Bill 62 alter the default payment structures for course delivery models. The current formula is not overly complicated but does take time to understand. To overly simplify the default reimbursement rates, the program takes two factors into account- the time to teach the course, and the resources needed to deliver instruction.

For example, under the model where a high school teacher has been credentialled by a post-secondary institution and teaches the course at the high school, the institution invests resources to develop the course and lesson plans, ensures curriculum and materials are regularly evaluated and updated, maintains the accreditation that allows the course to count toward a degree and credit transfer, and conducts the state required annual classroom observation of the high school teacher by the institution. Likewise, the high school has invested significant physical resources such as the classroom and the amenities that come with it (we all recognize that there is a cost to square footage). The school has also invested heavily in a second factor—the teacher’s time—in physically teaching the course, potential office hours to answer questions outside of class time, and grading papers. Because most of the time and resources come from the middle or high school, the reimbursement from the secondary school to the college is the floor default rate—around \$40 per credit hour.

If we examine the opposite delivery model where the student leaves the high school campus to travel to the college, the university assumes nearly all the resource liabilities, including the instructor’s time. Because of this responsibility, the reimbursement for the university is the ceiling default rate—around \$160 per credit hour.

House Bill 62 assumes that online delivery models should be reimbursed at 50% of the ceiling rate. We believe this rate is in error. Changing the reimbursement rate for online delivery from the default ceiling to 50% of the ceiling would result in Kent State losing a

little more than \$1.9 million dollars per year. We believe this rate should remain at the ceiling default rate.

Our reasoning is based on the following logic: A 50% reimbursement rate is the same rate as the delivery model where a college instructor travels to the high school to teach. While on the surface the resources to take an online course are simply a computer and internet access, which is sometimes supplied by the secondary school, there are many other resources to consider. Subscriptions and licensing fees for the software to deliver online instruction, content creation, servers, and the like have real costs, and account for the “square footage” of resources for teaching online, which can in many cases be more costly than physical space in a classroom. Because the end product is viewed on a high school or home computer does not mean that there was no cost to bring it there. Online courses are taught by university instructors, who invest their real time, not virtual time, in the instruction and grading. Just because a class is online does not mean that essays are automatically graded or that lectures are given by robots. In this way, universities bear both the resources and the time for online delivery models, and so the reimbursement should reflect that.

Finally, the bill again changes the reimbursement model to state that if a CCP course is taught at the high school by a credentialed high school teacher, but a student chooses to take it at the college from a college instructor, the reimbursement rate goes from the default ceiling—again, around \$160 per credit hour—to the default floor—around \$40. This provision simply throws the current “resources and time” calculation of the reimbursement rates out the window. The argument might be made that students should not be choosing to take CCP online or at the college when it is offered by the high school, but this proposed change in law does nothing to influence the student’s choice, it only changes the model to lessen the burden on the high school while increasing the burden on the college.

To that end, I encourage the committee to examine the second to last page of Auditor Faber’s performance audit of College Credit Plus, which is included at the end of this testimony. The first chart shows that the average Ohio school district spends just over .5% of its state funding on CCP. By contrast, Kent State waived \$7.9 million dollars in tuition last school year, which accounts for just more than 5% of our state funding. Again, K-12 spends POINT Five percent (.5%) of its state funding on CCP while it costs Kent State over 5% of our state funding. Why, then, tip the scales further and place more costs on universities?

Instead of simply opposing the bill, I propose the following approach: College Credit Plus began ten years ago, in 2015. The purpose of the program, as stated by ODHE, “is to promote rigorous academic pursuits and to provide a wide variety of options to college-

ready students<sup>1</sup>.” This goal, we believe, is being met through the fact that dual credit enrollment has grown by more than 250% over the last decade.<sup>2</sup> Over the same period, Ohio has cemented itself as the national leader in performance-based education in higher education, no longer funding based on enrollments, but instead only funding college student’s education when they pass courses and graduate. Unfortunately, a CCP program that only seeks to provide a wide variety of options to students and does not encourage thoughtful completion toward graduation may not be in sync with the performance funding model. A ten-year-old program should be able to track a student who began taking CCP in the 7<sup>th</sup> grade through earning their bachelor’s degree. What’s more, the Ohio Revised Code requires an annual report containing the time to completion of a degree for a college credit plus student, disaggregated by level and type of degree attained, measured against the overall student population who did not participate in CCP<sup>3</sup>. Unfortunately, this data is not reported in ODHE’s most recent annual report, so we don’t know if Ohio’s CCP students are more successful in gaining a degree than their non-participating classmates. Nor do we know if students are gaining their degrees more quickly, less expensively, or if they are entering the workforce more quickly and better prepared.

A thorough study of College Credit Plus through an independent, disinterested program evaluation would tell the state if CCP is, in fact, doing everything we want it to do and, if not, how we can improve the program to meet our shared goals. House Bill 62 should be re-written to create a study with an eye toward a holistic update to CCP, which should include an evaluation of the delivery models, funding, and reimbursement models to make sure that we’ve got it right.

Chairwoman Fowler Arthur and members of the committee, thank you for the opportunity to provide opponent testimony. I would be happy to make myself available via the Kent State Office of Government and Community Relations to answer any questions you may have.

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<sup>1</sup> <https://education.ohio.gov/Topics/Ohio-Education-Options/College-Credit-Plus>

<sup>2</sup>

[https://ohioauditor.gov/auditsearch/Reports/2022/Ohio\\_Department\\_of\\_Higher\\_Education\\_22\\_Performance-Franklin\\_FINAL.pdf](https://ohioauditor.gov/auditsearch/Reports/2022/Ohio_Department_of_Higher_Education_22_Performance-Franklin_FINAL.pdf)

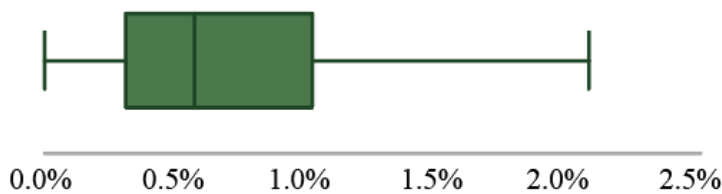
<sup>3</sup> ORC Sec. 3365.15

## 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