



**House Finance Committee
Higher Education Subcommittee
HB 474 Testimony
Ohio School Boards Association
Buckeye Association of School Administrators
Ohio Association of School Business Officials
May 17, 2016**

Chairman Duffey, Ranking Member Ramos, Committee members. Thank you for the opportunity to testify on the College Credit Plus provisions contained in HB 474 that are relevant to K-12 Public Education, and to provide suggestions for changes to that program. My name is Barbara Shaner, Interim Executive Director for the Ohio Association of School Business Officials (OASBO). Joining me today for this testimony and in answering your questions are Jay Smith, Deputy Director of Legislative Services for the Ohio School Boards Association (OSBA), and Thomas Ash, Director of Governmental Relations for the Buckeye Association of School Administrators (BASA).

Our organizations represent the public school district boards of education, superintendents, treasurers and business managers, and other school business officials from around the state. They are the leaders charged with the fiscal responsibility and performance accountability for their school districts. Our members have a keen interest in the existing College Credit Plus (CCP) program and the provisions contained in HB 474 that make changes, as well as the attached recommendations that we hope you'll consider.

We begin by stating that we support programs that give students options for enhancing their high school education experience. We are also in support of a students' ability to earn college credit for courses that also apply toward K-12 academic requirements. School districts across the state have provided dual enrollment course opportunities for many years through local agreements with institutions of higher education (IHE's) and through the former Post Secondary Enrollment Options (PSEO) program. We believe the new required CCP program is flawed, and changes are needed.

However, HB 474 makes changes to CCP that we oppose. First, it effectively eliminates the ability for school districts and IHE's to negotiate local agreements that allow school districts to pay the IHE lower than the "floor" amount (see the funding explanation below). Currently, these entities can jointly request a waiver from the Chancellor of the Department of Higher Education, allowing payments to go below the "floor" amount. The bill eliminates the Chancellor's ability to grant the waiver.

Second, HB 474 would expand CCP to include pilot programs to permit remedial college courses to qualify for CCP. It is our position that this provision is counter to the original stated purpose of CCP. We oppose this expansion of the program.

In order to better understand school districts' frustration with CCP, it is important to discuss how the program works and how it differs from the previous post secondary options program.

Funding: CCP mandates the level of payment school districts must make to IHE's based on a calculation that starts with the school funding formula's per-pupil Core Opportunity Aid (COA) amount. In the next fiscal year, that amount is set to be \$6000. The per-credit amount for CCP is based on 83% of the per-pupil amount divided by 30 credits (the maximum a student can earn each year under CCP).

This means the "floor" amount districts will be required to pay per credit in Fiscal Year (FY) 2017 is \$41.50. In the absence of a waiver from the Chancellor, school districts cannot pay less than the "floor" amount. Generally, the floor is applied when a student takes a course that qualifies for CCP (earns both high school and college credit) that is taught in the school district by a school district teacher. If that same course is taught by a college professor but on the school district's campus, the default amount is \$83 per credit. The "ceiling" amount will be \$166, the default amount when the student takes a course taught by a college professor on the college campus.

Districts can negotiate their cost through agreements with IHE's, but they can never go below the "floor" amount unless there is a waiver granted by the Chancellor. If there is no agreement on price, the default amounts listed above apply automatically.

Proponents of CCP point out that the school district required funding that is based on 83% of the per-pupil amount is less than the previous deduction for the old PSEO program. We concede that is the case for PSEO. When students chose this option, the full COA amount was deducted from the district's state aid. However, many districts worked with area IHE's to construct agreements that were less costly than the PSEO deduction. Students self-opted for PSEO courses when no agreement was present for the particular courses they wanted to take.

Therefore, we believe it is misleading to compare only the PSEO option to CCP when discerning whether or not CCP is more favorable financially to school districts.

Further, as with PSEO, CCP affects districts differently, depending on their local wealth. While the per-credit amount is based on 83% of the COA amount, because of the formula's State Share Index (the factor used to determine the required per-pupil local share contribution), districts do not receive the full COA from the state. According to the latest data, 424 of Ohio's school districts do not receive the full \$5,900 for the current school/fiscal year, even after taking into account the funding cap, the guarantee, and the performance bonuses. Yet the amount deducted assumes they are simply passing along to the IHE, their state aid for these students. That is not the case. A local share, or a portion of local property tax is required to follow the CCP students.

Tom Ash will now continue the testimony.

Dual Enrollment Agreements: As we have already indicated, we know anecdotally that many school districts around the state held local agreements with IHE's for dual enrollment courses for many years prior to CCP. Some utilized these courses in place of AP and IB courses as a way to provide students with courses of rigor. However, there is no statewide data indicating just how many students participated in the utilization of dual enrollment courses. As far as we know, the only data available are from students who elected to take college courses through the PSEO program where the state deducted funds from districts' state aid. The local agreements allowed for the money to change hands locally, without state intervention.

We have heard testimony in this committee to the effect that participation in college level courses has increased dramatically with CCP. It is unclear to us how these claims can be justified without data showing the students who were participating through local agreements.

Textbooks: School districts are required to bear the full cost of textbooks under the new CCP program. Previously, these costs were often covered by the local agreement with the IHE, or students were required to cover the textbook cost. Many problems have arisen for districts with this new requirement, including their inability to plan ahead for the cost. More information about some of the problems districts have encountered can be found in the Recommendations for Change document attached to this testimony.

Rigor: When CCP was first proposed, it was our understanding that the program was intended to break down perceived barriers for students to participate in college level courses. As we just mentioned, it is unclear whether or not and to what extent those barriers existed. We were made to understand that CCP was also established to ensure that these courses were uniformly rigorous.

Our members report that it is their belief that CCP courses may not provide consistent rigor and that no proper evaluation of college readiness applies before students are permitted to take courses. Previously, school districts were permitted to set minimum standards for students' eligibility to take college level courses. No such standard is present with CCP. If the college accepts the students, they are permitted to participate. There appears to be no uniform college entrance standard for CCP students. This could lead to unintended results for students attempting to succeed in college later, as failure or low grades will appear on the student's transcript. School districts should be permitted to play a more active role in determining a student's college readiness.

Remediation: We have heard comments in this committee to the effect that school districts are failing to prepare students for college. It is our understanding that the only data available regarding this topic is related to students attending the state's public colleges and universities, so we caution the use of a broad brush to articulate school districts' effectiveness. Also, there is no statewide standard that students must meet to be considered college ready.

That said, we agree that more work is needed to prepare all students for college and career.

Background for Recommendations: The current school year (FY 2015-2016) is the first year of implementation for the new CCP program. After just a few months of implementation, we had begun hearing negative feedback about the program from our members across the state. We formed a committee of school leaders who had experienced problems. We conducted a survey of school districts and found that many reported similar concerns as those on the committee. As a result of the survey and also the anecdotal concerns from the group, a writing team made up of representatives of our three organizations developed a set of recommendations for changes to CCP (see attached).

In addition to the recommendations that we will cover in this testimony, it includes rationale for the recommendations as well as some examples of problems encountered by districts and students. While some issues have appeared to be problems that could occur with the implementation of a new program (such as inadequate communications between parties), others appear to be much more significant, and it is those issues we urge you to consider. We are hopeful that you will include these recommendations in HB 474.

Jay Smith will outline the recommendations we are suggesting on behalf of our members.

The following are recommendations for changes to the program:

- Set a uniform standard for determining college readiness (students' qualified to participate in CCP). School districts must play a role in determining a student's readiness for college level courses.
- Develop metrics for comparisons between college level courses that qualify for CCP and courses available at the high school level. College courses qualifying for CCP must be as rigorous or more rigorous than the courses students can take at the high school level. Otherwise, more should be done to assure that high school level courses can result in college credit.
- Create a statewide textbook policy that reduces the burden for school districts if they are to be the sole provider of textbooks for CCP courses. A more structured state policy should be adopted to ensure a more uniform practice statewide for the purchase and use of textbooks for CCP courses.
- Eliminate the "floor" for school districts where school district faculty is conducting the CCP Course on the school district campus and instead allow flexibility at the local level for financial agreements between school districts and IHEs. (Perhaps the colleges could receive state aid to cover the cost of providing college credit to the student, etc.; meanwhile school districts are already covering the costs for high school credit).
- Establish a level of financial responsibility for parents (based on a means-tested formula as with other state policies) in order to create accountability for the student and family rather than CCP being an entitlement regardless of student's performance or outcome in the college course.
- Create a commission or committee that includes all stakeholders for the decision making and rule setting for CCP (IHE and ODE as well as local district personnel).

- Increase the availability of high school teachers qualified to be adjunct instructors permitted to teach CCP courses. School districts currently do not have any authority for the approval of qualified instructors, and there is no statewide consistency in who is selected to teach. Qualified high school instructors may not be selected by IHEs, which may elect to use their own faculty members.

This concludes our testimony. We will be happy to address your questions.



College Credit Plus Recommendations for Change BASA/OASBO/OSBA

There appears to be a “disconnect” between the education organizations’ understanding of the purpose behind the new College Credit Plus (CCP) program and the realities districts are experiencing. We understood the purpose was to:

1. Eliminate barriers for students with little to no opportunity for advanced standing courses.
2. Provide more opportunities for college credit (rigorous college level courses) for those students who have already demonstrated a readiness for college while still in secondary school.
3. Allow more students to leave high school having earned college credit and thereby reduce the overall cost of a college degree.

We believe the realities of the new CCP for school districts do not match our understanding of the intent and in fact, students may be harmed as a result of these realities. Unfortunately, it is the view of many school district leaders that CCP takes a step backwards in reaching the three goals outlined above (see “BACKGROUND AND RATIONALE section on page 2 for details which have led to this view). We urge state policy makers to make changes to improve the program.

The following are recommendations for changes to the program:

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- Develop metrics for comparisons between college level courses that qualify for CCP and courses available at the high school level. College courses qualifying for CCP must be as rigorous or more rigorous than the courses students can take at the high school. Otherwise, more should be done to assure that high school level courses can result in college credit.
- Create a statewide textbook policy that reduces the burden for school districts if they are to be the sole provider of textbooks for CCP courses. A more structured state policy should be adopted to ensure a more uniform practice statewide for the purchase and use of textbooks for CCP courses.
- Eliminate the “floor” for school districts where school district faculty is conducting the CCP Course on the school district campus and instead allow flexibility at the local level for financial agreements between school districts and IHEs. (Perhaps the colleges could receive state aid to cover the cost of providing college credit to the student, etc., meanwhile school districts are already covering the costs for high school credit).
- Establish a level of financial responsibility for parents (based on a means-tested formula as with other state policies) in order to create accountability for the student and family rather than CCP being an entitlement regardless of student’s performance or outcome in the college course.

- Create a commission or committee that includes all stakeholders for the decision making and rule setting for CCP (IHE and ODE as well as local district personnel).
- Increase the availability of high school teachers qualified to be adjunct instructors permitted to teach CCP courses. School districts currently do not have any authority for the approval of qualified instructors, and there is no statewide consistency in who is selected to teach. Qualified high school instructors sometimes are not selected by IHEs, which may elect to use their own faculty members.

BACKGROUND AND RATIONALE FOR RECOMMENDATIONS

Realities for School districts:

Barriers

Successful Dual Enrollment courses/agreements were very much in existence prior to College Credit Plus. In some rural areas of the state, there may have been fewer of these agreements; however, the agreements did exist for some time before CCP and were very successful:

- Most school districts were able to negotiate agreements with Institutions of Higher Education (IHE) that resulted in either no cost or low cost to students and to the district.
- Many school districts utilized a means-tested policy for determining whether or not, or how much, students would pay for college tuition (where a cost was incurred by the school district).
- Many school districts and IHEs agreed that the IHE would provide the textbooks.
 - Under CCP, textbooks have become a huge expense for school districts with little to no control over their purchase.

Opportunities

It appears that more students are taking advantage of college courses through the new CCP program. However, there is no uniform or clear determination as to whether or not a student is “college ready.”

- School districts are reporting that students are choosing to substitute less rigorous college courses for more challenging courses at the high school level (i.e., AP, IB, and other advanced level courses).
 - Districts are being forced to eliminate some more rigorous high school courses since fewer students are enrolling.
 - Class ranking may be affected, thereby creating an uneven playing field for those choosing more rigorous coursework
- Likewise, many students who have not performed well in traditional high school courses are enrolling in CCP courses.
 - Anecdotally, there appears to be a significant number of students failing CCP courses, which could adversely affect their college GPA.
 - Students who drop CCP courses may not have time to pick up the credit required for graduation if they have withdrawn after a deadline date.
 - Are the traditional districts responsible for making credit opportunities available when a student drops a course midway through the semester?
- In some instances, school districts are able to host CCP courses on their own campus with school district staff teaching the courses.
 - However, districts are paying tens of thousands of dollars to the IHEs for courses taught by their own teachers in their own buildings.

Communication

Communication between IHEs and school districts is insufficient to ensure success.

- School districts have reported having no information from the IHE about which students have been accepted until late into the semester.
- Grades and progress by the student are not communicated in a timely manner to the school district.

- Districts that have GPA requirements for participating in sports and other extracurricular activities may not have the information they need from the IHE to make an appropriate determination.

Textbook Practices

- IHEs have complete control over which textbooks will be required for a CCP course, even though the school district must bear the cost.
- Previously, local agreements with IHEs may have included the cost of the textbooks (covered by the IHE).
- No uniform practice has been followed among IHEs for the purchase of textbooks.
 - Some IHEs have provided textbooks to the students and subsequently billed the district, with the district having no idea what the cost will be.
 - Some IHEs have sold textbooks to individual students requiring that the student get reimbursement from the school district.
 - Many IHEs have offered to buy back the textbooks (sometimes unused by the course instructor) for a price that is pennies on the dollar compared to the original price the district paid.

HB 445

HB 445 was introduced on February 3 to address some of the issues with the CCP, some of which have been articulated in this document. The legislation, which is currently in the House Education Committee, had its first hearing on February 16

Our organizations are generally supportive of the proposed changes contained in HB 445. However, there is not clear agreement by our membership on the provision that would change the amount of high school credit that would be awarded to a student for a CCP course (see the next to the last provision listed here). We believe the provision needs more discussion among stakeholders.

HB 445 contains, among other provisions, the following:

- Any textbook purchased for a CCP course is the property of the entity that paid for the textbook. A CCP student is required to return any textbook to the entity that paid for the textbook.
- We believe these provisions are currently required by administrative rule; however, some districts have reported experiences that do not align with the rule.
- A school's policy for awarding grades and calculating class standing for CCP courses must be equivalent to the school's policy for comparable courses taken under another Advanced Standing program or for comparable honors courses. (However, it is not clear who determines which courses are comparable.)
- Schools are prohibited from applying a weighted grade or enhancing a student's class standing for a CCP course that is not comparable to an Advanced Standing or honors course.
- High school credit for CCP courses is to be awarded at a ratio of one unit of high school credit for every four credit hours of college credit (rather than three). This last point creates an interesting dilemma:
 - On the one hand, it addresses the issue of having one semester of a college course being equal to a year-long high school course.
 - On the other hand, this could force students to take additional CCP courses in order to meet Ohio's graduation requirements (with additional cost to the school district).
- The bill specifies that if a CCP course is offered and delivered on the campus of a student's high school, that student cannot enroll in a comparable CCP course that is delivered on the college's campus, at another location operated by the college, or online.
 - While this provision solves an issue raised by members about students choosing to attend courses at the college rather than attend a CCP course offered at the high school, it could be punitive for a student attending other courses on the college

campus.

- If CCP courses were to be required to meet standards of rigor equal to the high school course already offered (as suggested in the recommendations included in this document) this provision might not be necessary.