



Date: December 12, 2014  
To: Ohio Board of Regents  
From: The Ohio Association for Gifted Children  
RE: OAGC Input on College Credit Plus Rules

The Ohio Association for Gifted Children (OAGC) generally supports the initial draft of the College Credit Plus rules 3333-1-65 - 3333-1-65.10. We are particularly supportive of the provision that clarifies the amount of high school credit to be awarded for College Credit Plus courses. In addition, OAGC strongly supports the provision that directs secondary schools to outline non-cost options to students when those schools have entered into partnering agreements with non-public institutions of higher education (IHEs) that result in a student fee. Finally, we are pleased to see clarification that non-public institutions of higher education that are part of College Credit Plus program must allow all qualified students in grades 7 – 12 access to course offerings. While OAGC largely agrees with the draft rules language, we believe that there are a few areas that can be improved:

1. 3333-1-65.1 – Notice to students regarding program opportunities and program requirements. The annual notice language to parents and students is weak. It could be stronger by requiring notification on the district website and student handbooks as well as written notice to parents.
2. 3333-1-65.2 – Program requirements for secondary schools. The rule prohibits all students including those accessing College Credit Plus in 7<sup>th</sup> and 8<sup>th</sup> grade from taking more than 120 credit hours. There is no basis in Ohio Revised Code for this prohibition and could potentially impede some of the most gifted students from receiving the educational opportunities that they need. This prohibition needs to be removed or revised to accommodate 7<sup>th</sup> and 8<sup>th</sup> grade students. Also, if allowed under ORC, a student should be allowed to take such classes as marching band or physical education even while taking the maximum number of credit hours under College Credit Plus program.
3. 3333-1-65.3 – Program requirements for secondary schools. The rule neglects to address the requirement in ORC to apply weighted grades to College Credit Plus courses. This is being misinterpreted widely across the state. The rule needs to clarify that College Credit Plus courses need to have similar weights applied as other weighted courses in secondary schools *regardless of whether the district has a similar course* for all academic courses. This ensures that schools with weighted graded systems do not use these systems to deter students from participating in College Credit Plus rather than a local high school honors or AP course. Some districts have used unfair grade weighting policies to discourage students with goals of attending a selective university in the future from pursuing credit flexibility options. Without clarification, students taking the highest level courses that cannot be offered at secondary schools may be penalized by not receiving a weighted grade as intended by Ohio Revised Code.
4. 3333-1-65-3 – Program requirements for institutions of higher education. The rule needs to be strengthened to ensure that the only reason a qualified College Credit Plus student would be

prohibited from *any* public IHE campus would be specific course enrollment caps. Some IHEs as a matter of practice prohibit all secondary students from certain campuses regardless of course capacity. This unnecessarily denies access for some high school students to the most convenient campus and in some cases to campuses where certain high-level courses are offered.

5. 3333-1-65.10 – Process for Waiver –The rule needs to indicate that no individual student can be prohibited from accessing College Credit Plus even if a district has a waiver. The rule currently offers no guarantee that individual students in any district can access College Credit Plus regardless of partnership agreements, waivers, etc. The existence of special partnership agreements should not limit students’ access to courses offered by other IHEs. This is crucial to ensure that students across the state have equal access to courses that may be offered by one IHE but not another, and is especially important for gifted students who may require early access to specialized courses and facilities that may be less commonly available across IHEs.

If you have any questions or comments, please contact Ann Sheldon, Executive Director of the Ohio Association for Gifted Children, at 614-325-1185 or [anngift@aol.com](mailto:anngift@aol.com) .