



Date: December 30, 2014
To: Chancellor John Carey, 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 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. This is particularly important when those schools have entered into partnering agreements that result in a student fee. Finally, we are pleased to see clarification that non-public institutions of higher education (IHEs) that are part of the 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 need to be addressed in order to ensure maximum student access to the program. These changes are listed in order of importance.

1. **The draft rules neglect to address the requirement in Ohio Revised Code to apply weighted grades to College Credit Plus courses.** The law is fairly clear that all College Credit Plus courses are to be provided the same weights as other district advanced standing courses such as Advanced Placement (AP). However, the law 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. The rule also should specify that if the course taken under College Credit Plus is non-remedial and college credit bearing that it should receive the highest weight that the school offers to other advanced standing courses.

These changes are necessary to ensure that districts with weighted grading 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. This is common practice with the current PSEO (Post Secondary Enrollment Options) program, and it is a threat to the future success of College Credit Plus. There is evidence that districts will continue to use weighted grading policies to discourage students from accessing the courses they need through College Credit Plus in favor of district courses that may not be as appropriate for the student.

Many district personnel look to the rule rather than Ohio Revised Code to drive their district policies. Without clarification within the rule, students taking the highest level courses that cannot be offered at secondary schools may be penalized by not receiving a weighted grade as intended in Ohio Revised Code. If the driving force behind College Credit Plus is increasing student access, this issue must be addressed in the draft rule.

Our suggest language change is as follows in **Bold:**

3333-1-3 (B) (5) Secondary schools shall implement a policy for the awarding of grades and the calculation of class standing for courses taken under division (A)(2) or (B) of section 3365.06 of the Revised Code. The policy adopted under this division shall be equivalent to the school's current policy for courses taken under the advanced standing programs described in divisions (A)(2) and (3) of section 3313.6013 of the Revised Code. If the current policy includes awarding a weighted grade or enhancing a student's class standing for courses taken under these programs, the policy adopted under this section shall also provide for these weights to be applied to courses taken under the college credit plus program, regardless of whether a similar course is offered at the district. Districts shall apply enhanced student class standing and the highest weighted grade under the school's policy to all college-credit bearing courses under the college credit plus program including courses provided on the secondary school campus, the participating college campus, at another location operating by the college or online.

2. The rule prohibits all students including those accessing College Credit Plus in 7th and 8th 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 7th and 8th grade students.

Our suggested language change is as follows in **BOLD**:

3333-1-65.2 (B) (2) Each secondary school shall verify that a student electing to participate in the college credit plus program is not taking more than thirty college credit hours during an academic year ~~and not more than the equivalent of four academic years, or one hundred and twenty college credit hours total~~ through the college credit plus program under division (B) of section 3365.06 of the Revised Code, including those students eligible to start participating in the program in seventh and eighth grade.

3. 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 student 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. It is especially important for gifted students who may require early access to specialized courses and facilities that may be less commonly available across IHEs.

Our suggested language change is as follows in **BOLD**:

3331-1-65.10 (E) Regardless of any waiver or partnership agreement, public and participating secondary schools and public and participating colleges may not deny eligible students from participating in any form of college credit plus program outside of the waiver or partnership agreement including courses taught on a college campus, at a location operated by a college, online, or at the secondary school.

4. **The annual notice language to parents and students in the draft rule is weak.** It could be stronger by requiring notification on the district website and student handbooks as well as written notice to parents.

Our suggested language change is as follows in **BOLD**:

3333-1-65.1 **Notice to students regarding program opportunities and program requirements.**

(A) Secondary schools

(1) Annual notice to students

(a) Each secondary school shall issue a notice, prior to March first of each year, providing information about the college credit plus program to students and parents **at a minimum through the school's website and the student handbook** as well as other multiple and easily accessible resources, which can be satisfied by any of the following:

(i) The school's website;

(ii) Written communications;

(iii) Student assemblies;

(iiiv) Joint communication events with postsecondary institutions.

5. **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.

Our suggested language change is as follows in **BOLD**:

3333-1-65-3 (1) A participating institution of higher education shall apply its established admission criteria for participation in the college credit plus program, which shall not do any of the following:

(a) Be set at a higher standard than the admission criteria established for other students attending the institution;

(b) Require different standards among students participating in College Credit Plus based on secondary grade-level or student age.

(c) Prohibit participation on any public institution of higher education campus for any other reason than specific course capacity limitations.

Thank you for allowing OAGC to provide input into the draft College Credit Plus Rules. 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 .