



Deborah A. Gist
Commissioner

State of Rhode Island and Providence Plantations
DEPARTMENT OF EDUCATION
Shepard Building
255 Westminister Street
Providence, Rhode Island 02903-3400

Enclosure 7f
February 23, 2015

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TO: Members of the Council on Elementary and Secondary Education

FROM: Deborah A. Gist, Commissioner 

RE: Proposed Regulations for Dual Enrollment - Feedback from Public Review and Comment

At its December 1, 2014, meeting, the R.I. Board of Education approved, for the purpose of public review and comment, a proposed draft of the Regulations for Dual Enrollment, which were developed with input from the public postsecondary institutions and other stakeholders.

The attached proposed regulations reflect input from the public review and comment period, which was held between December 22, 2014 and January 31, 2015 and the three (January 15, January 20, and February 5) public hearings held.

The proposed regulations will be presented to the Board of Education with a motion to approve the policy at its March 2, 2015, quarterly meeting.

RECOMMENDATION: That, the Rhode Island Board of Education approves the proposed Regulations for Dual Enrollment, as presented.

Summary of changes to Dual Enrollment Regulations

Summary of Comments	Change to document or section	Suggested Change to language or other
RIDE suggested changes to regulations for clarity	Entire document	<ul style="list-style-type: none"> • Consistent use of terms dual enrollment and concurrent enrollment • Use LEA in place of district • Use of secondary school for high school
4.1 Need an earlier date for MOA	4.1 no suggested change	
4.2 Definition of low-income student is not provided	4.2 change	No low-income student, as defined by RIDE , shall be denied...
4.2 include language for tuition instead of only “fees”	4.2 change	...on their inability to pay course related tuition and fees .
5.1 concern regarding use of standardized assessments for eligibility	5.1 change	Postsecondary institutions shall establish eligibility criteria and if applicable assessment standards...
5.4 concern about specificity of using 504 language	5.4 change	Students with disabilities or students who are English Language Learners shall receive the protections, services and accommodations set forth in their Section 504 plans and as prescribed...
7.2 concern about date of RIDE published information	7.2 no suggested change	
7.5 RIDE suggested change from WaytogoRI as only location for posting dual enrollment course information	7.5 change	The WaytogoRI website (www.waytogori.org) will house Information about the concurrent and dual enrollment courses available at postsecondary institutions will be published on the RIDE website and on mentor portals such as WaytogoRI (www.waytogori.org)
Public comment concerns regarding funding and specifics on roles and responsibilities	No change to regulations	Many of the concerns regarding specifics on roles and responsibilities is included in the MOA

Redacted summary of public hearing and written comment on Secondary Regulations Revisions

Title/Affiliation	Support	Oppose*	Notes
(WC) Written comment (PT) public testimony			
ACLU (WC) RI Legal Services (PT) RI Teachers of English Language Learners (WC) All three signed on to written testimony shared at public hearing session	✕	✕	4.2 <ul style="list-style-type: none"> • Need assignment of responsibility for providing funding for financial support for low-income students; define low income • Define /describe notification process for families and students; Ensure that concurrent courses for high school credit are free for students 5.4 <ul style="list-style-type: none"> • Only mention of 504, other students are entitled to support and protection specified in IDEA. 5.0 <ul style="list-style-type: none"> • Clearly define and use a uniform set of eligibility criteria • Establish uniform monitoring system to prevent discriminatory actions, • Eligibility criteria not just assessment • Allow students to waive into course • Require LEAs to actively recruit students and monitor the results • Request for reasons for or against adoption of suggestions
College Crusade (WC) (PT)	✕		2.2 <ul style="list-style-type: none"> • Clarify what minimum standards are for LEA to be in compliance • Describe/define fully implemented 2.5 <ul style="list-style-type: none"> • Need details of post-secondary transfer and articulation policy 3.0 <ul style="list-style-type: none"> • Add section for PD and training for teachers 4.2 <ul style="list-style-type: none"> • Refer to tuition and fees and not simply fees • Identify source of funding if LEA cannot cover costs 5.0 <ul style="list-style-type: none"> • Need monitoring of implementation to determine increased opportunity for low-income students

Redacted summary of public hearing and written comment on Secondary Regulations Revisions

			<p>6.1</p> <ul style="list-style-type: none"> • Need date for deadline for local adoption of policy • Include timeline for approval and adoption <p>6.1c</p> <ul style="list-style-type: none"> • Communicate to families and students, risks for failing or not completing course (financial aid probation) <p>6.2 Publish one document that incorporates all post secondary information</p>
Principal (WC)	✗		<ul style="list-style-type: none"> • Policy appears to unduly burden LEAs with cost, there is no cost sharing with HE institutions
RISCA (WC)	✗		<p>4.1</p> <p>Proposed deadline of March 15th for MOA on costs is late and wil prevent some students from accessing dual enrollment programs, January 30th deadline is more reasonable</p> <p>4.2</p> <p>Concern about the quality of oppportunities if districts decide what is financially possible.</p> <p>5.1</p> <p>Concern regarding the use of state standardized assessments for dual enrollment eligibility</p> <p>7.2</p> <p>Proposed deadline of March 31 for RIDE published information provides insufficient time for districts to financially plan and for students to make decisions.</p>
<p>There were two speakers at the public hearing session 2/5/15 who also submitted written testimony There were four written comments submitted.</p>			
<p>* None of the comments were in overall opposition to the regulations, however all had suggestions for clarity and specificity of language. There was a common concern regarding lack of assigning funding responsibility or identifying source of funding.</p>			

Rhode Island Board of Education Regulations for Dual Enrollment

INTRODUCTION

These *Regulations for Dual Enrollment* are promulgated pursuant to authority conferred under Rhode Island General Law 16-100-3(a) and are established for the purpose of adopting a statewide dual enrollment policy that allows students to enroll in public postsecondary education courses to satisfy academic coursework requirements in high school and earn credits at a public postsecondary institution. These regulations are intended to expand student access to postsecondary coursework and are not intended to preempt existing agreements or to prevent future agreements between ~~school districts~~ [Local Education Agencies \(-LEAs\)](#) and Rhode Island's public postsecondary institutions.

In accordance with §16-100-3(b), a workgroup was convened to consider a dual enrollment policy and provide advice to the Board of Education. The workgroup's findings included the beliefs that a dual enrollment policy would accomplish the following:

- Expand early college access for all qualified Rhode Island students, particularly traditionally underrepresented students.
- Maximize the recognition of rigorous postsecondary coursework for purposes of meeting high school graduation requirements.
- Reduce the amount of time and expense required to obtain a college degree.
- Promote the partnership between elementary and secondary education and public postsecondary institutions.

These regulations are therefore adopted to fulfill the purpose of Chapter 100 of Title 16 and the objectives envisioned by the workgroup.

PART I: DEFINITIONS

Wherever used in these regulations, the terms listed below shall be construed as follows:

- 1.1 "Career Development Course" means a postsecondary course that assists students in preparing for employment.
- 1.2 "College Success Course" means a postsecondary course that assists in a student's transition to college by offering instruction and strategies for success in college and life-long learning.
- 1.3 "Dual Enrollment" means that a student is enrolled in a secondary school while simultaneously enrolled part-time or full-time as a non-matriculating student at a postsecondary institution, such as a community college, college or university.

- 1.4 “Concurrent Enrollment” means a student is enrolled in a dual enrollment course that is offered at the secondary school and taught by a secondary school teacher who is approved by the postsecondary institutions.
- 1.5 “Graduation Coursework Requirements” means the coursework requirements set forth in section L-6-3.1 of the Board of Education’s Secondary School Regulations.
- 1.6 “Secondary Schools” means schools in all Rhode Island school districts, charter public schools, career and technical centers, approved private day and residential schools, and collaborative schools granted the authority by the Rhode Island Department of Education to offer a high school diploma.
- 1.7 “Specific course equivalencies” means courses offered by a postsecondary educational institution that can be transferred to another postsecondary institution for approved credit.
- 1.8 “Postsecondary institution” means all Rhode Island public institutions of higher education.

PART II: DUAL ENROLLMENT POLICY

Section 2.0 Academic

- 2.1 Students enrolled in Rhode Island secondary schools shall be allowed to enroll in postsecondary education courses to satisfy academic coursework requirements in ~~high the secondary~~ school and earn credits at public postsecondary institutions.
- 2.2 Dual and concurrent enrollment coursework shall include
 - (a) General education courses, elective courses, and specific course equivalencies;
 - (b) Career and technical education (vocational training) courses; and
 - (c) College-success and career-development courses.
- 2.3 Dual enrollment courses shall have the same educational outcomes and academic policies as other courses taught at the postsecondary institution.
- 2.4 Concurrent enrollment courses shall have the same educational outcomes as their counterpart postsecondary courses.
- 2.5 The grade and credits earned in a dual or concurrent enrollment course shall be recorded on a postsecondary transcript. The transferability of credits is determined in accordance with Postsecondary Council transfer and articulation policy.

2.6 Dual enrollment courses shall count toward a student's [high-secondary](#) school coursework graduation requirements if the student complies with the postsecondary institution's grading, attendance, and behavioral policies and successfully completes the course. Concurrent enrollment courses shall count toward the student's high school coursework graduation requirements if the student, pursuant to the secondary school's grading, behavioral, and attendance policies, successfully completes the course. The secondary school may give a dual or concurrent enrollment course extra weight in calculating a high school grade point average (GPA). Generally, a three or four credit college course shall be equivalent to one credit of high school course work.

Section 3.0 **Instructors**

3.1 Postsecondary instructors of dual and concurrent enrollment courses shall ensure that these courses have the same educational outcomes as their corresponding postsecondary courses.

3.2 Instructors of concurrent enrollment courses at the secondary public school shall be approved by the postsecondary credit-granting institution and possess similar qualifications as instructors teaching the corresponding course at the postsecondary institution. Secondary school teachers shall hold the certification required by the Council for Elementary and Secondary Education for the course that is being taught.

3.3 The postsecondary institution shall assign staff to coordinate and oversee the selection and delivery of [dual and](#) concurrent enrollment courses in partnership with K-12 stakeholders such as school superintendents, high school principals, and counselors.

3.4 The postsecondary institution shall provide the appropriate orientation to instructors of dual enrollment courses.

3.5 Public secondary school teachers shall be evaluated by their employer pursuant to the educator evaluation system approved by the Department of Education and in accordance with Rhode Island law and applicable regulations.

Section 4.0 **Cost**

4.1 Dual enrollment and concurrent enrollment course costs will vary by course and delivery method. Concurrent enrollment course offerings and course costs shall be annually established by postsecondary institutions and approved by the Board of Education. Qualified secondary students shall have access to each postsecondary institution's full course catalog through dual enrollment. Dual enrollment coursework is subject to each respective institution's scheduling policy. Each year, the Rhode Island Department of Elementary and Secondary Education and the Office of Postsecondary Commissioner will enter into a mutually agreed upon memorandum of agreement no later than March 15th detailing the catalog of concurrent enrollment courses and the costs for each respective course.

4.2 ~~Districts~~ LEAs shall support, if financially possible, the cost of providing dual and concurrent enrollment programming. Given the postsecondary benefit, students and families may be asked to contribute all or a portion of the cost of providing dual and concurrent enrollment programming. No low-income student, as defined by the Rhode Island Department of Education, shall be denied access to dual or concurrent ~~or dual~~ enrollment coursework on their inability to pay course related tuition and fees.

Section 5.0 **Student Eligibility Criteria**

5.1 Secondary school students may take dual and concurrent enrollment coursework upon the approval of their principal, director or head of school, in accord with local enrollment criteria. The criteria shall be based on the student's academic, behavioral, and attendance record and, if applicable, the student's results on an ACT, SAT, ACCUPLACER, PSAT, EXPLORE or state standardized assessments. Student age will not be a determiner of enrollment. Postsecondary institutions shall establish eligibility criteria and, if applicable, assessment standards to determine college readiness.

5.2 In the case of career and technical education dual and concurrent enrollment coursework, secondary school students must meet the course-specific eligibility requirements.

5.3 Secondary school students shall not be denied access to dual and concurrent enrollment coursework provided they meet the local enrollment criteria and there is space available in the course.

5.4 Students with disabilities or students who are English Language Learners shall receive the protections, services and accommodations ~~set forth in their Section 504 plans and~~ as prescribed by federal and state law in accordance with the

policies and procedures of the postsecondary institution in the case of dual enrollment or the secondary school in the case of concurrent enrollment.

Section 6.0 Student Supports

6.1 Local school committees shall adopt a dual and concurrent enrollment policy and provide students and their families with information about dual and concurrent ~~and dual~~ enrollment coursework requirements and the potential benefits and consequences of dual and concurrent ~~and dual~~ enrollment prior to approving a request for dual and concurrent ~~and dual~~ enrollment. RIDE will provide this consolidated information to ~~school district~~ LEAs to ease dissemination. This information shall include, but not be limited to:

- (a) Student eligibility criteria;
- (b) Conditions warranting removal from enrollment;
- (c) The requirements of the dual and concurrent ~~and dual~~ enrollment course and the consequences of failing or not completing a course, including the effect on the student's ability to complete the secondary school's proficiency-based graduation requirements;
- (d) The process for granting dual and concurrent ~~and dual~~ enrollment academic credit at both the postsecondary institution and the secondary school;
- (e) The benefits to the student of successfully completing a dual or concurrent ~~or dual~~ enrollment course, including the potential reduction of the overall cost of, and the amount of time required, for obtaining a college degree;
- (f) Available educational support services at the secondary school and the postsecondary institution;
- (g) The student's academic, attendance and conduct responsibilities;
- (h) Scheduling and transportation, which shall be the student's and/or family's responsibility, for dual enrollment coursework at a postsecondary institution; and
- (i) A fact sheet generated by the postsecondary institution detailing requirements outlined in 6.2.

6.2 Rhode Island public postsecondary institutions must provide information to secondary school counselors, school leaders and other designated secondary school personnel about the concurrent and dual enrollment coursework program including, but not limited to, course content, grading policies, attendance requirements, course completion requirements, performance

standards, graduation requirements and the ability to award degrees/certificates in Rhode Island (if applicable).

- 6.3 Students will be enrolled in dual enrollment courses offered at postsecondary institutions by staff from the postsecondary institutions working with staff from the secondary schools.
- 6.4 Secondary school students taking a dual enrollment course at the postsecondary institution shall have access to the same educational support services that are available to students enrolled at the postsecondary institution.
- 6.5 The parent and ~~school district~~LEA shall determine how to approach any courses offered by public postsecondary institutions that are not on the list of available courses or are provided by private postsecondary institutions.

Section 7.0 **Information Access and Management**

- 7.1 The Office of the Postsecondary Commissioner shall annually obtain information from Rhode Island postsecondary institutions about possible dual and concurrent enrollment courses and provide to the Department of Elementary and Secondary Education a list of available concurrent enrollment courses that may be taught at secondary schools by qualified instructors.
- 7.2 The Department of Elementary and Secondary Education shall publish and disseminate the list of approved courses to be offered and the program requirements to all secondary schools by March^{31st} of each school year.
- 7.3 Secondary schools shall provide all students and their families with the available course and program information at the time of course selection for the subsequent school year.
- 7.4 The Office of the Postsecondary Commissioner and the Department of Elementary and Secondary Education shall collaborate with the Rhode Island Higher Education Assistance Authority to provide information on dual and concurrent enrollment opportunities.
- 7.5 The WaytogoRI website (www.waytorgi.org) will house information Information about the concurrent and dual enrollment courses available at public postsecondary institutions will be published on the RIDE website and on mentor portals such as WaytogoRI (www.waytorgi.org).

Section 8.0 **Reporting**

8.1 The Office of the Postsecondary Commissioner and the Department of Elementary and Secondary Education shall establish data reporting requirements within thirty (30) days of the adoption of these regulations for Rhode Island public postsecondary institutions and secondary schools, respectively. The reported data from Rhode Island's postsecondary institutions and secondary school shall form the basis of an annual joint report by the Office of the Postsecondary Commissioner and the Department of Elementary and Secondary Education to the legislature, beginning October 2016.

The joint report shall include, but not be limited to:

- (a) The number of secondary school students participating in dual [and concurrent](#) enrollment programs;
- (b) Participant demographics;
- (c) Credits earned at each of the postsecondary institutions; and
- (d) The number of high school instructors, by course and by affiliated postsecondary institution, teaching ~~dual-concurrent~~ [enrollment](#) courses.