



Concurrent Enrollment Advisory Board
Funding and Attendance Discussion Items
July 24, 2014

The department recently performed a review of policies and procedures related to programmatic and funding aspects of the Concurrent Enrollment (CE) and Accelerating Students through Concurrent Enrollment (ASCENT) programs. As part of this effort, the department has made determinations on three issues which warrant discussion with the Concurrent Enrollment Advisory Board as described below.

Issue 1 - Funding:

The existing funding determination based upon Concurrent Enrollment credit hours is inappropriately generous.

When determining funding, the following is the existing guidance to districts and historical treatment for funding determinations related to Concurrent Enrollment:

- Full-time funding eligibility: If a student is taking courses only through the institution of higher education, he or she must be enrolled in a minimum of 6 semester credit hours through the institution of higher education as of the pupil enrollment count day to be eligible for full-time funding.
- Part-time funding eligibility: If a student is taking courses only through the institution of higher education, he or she must be enrolled in a minimum of 3, but less than 6, semester credit hours through the institution of higher education as of the pupil enrollment count day to be eligible for part-time funding.
- If the student is enrolled part-time at both the high school and institution of higher education, the student may be funded full-time.

The current treatment for CE was based upon Section 22-35-104(1)(d)(I) and (II), C.R.S.¹

Concern 1: The basis for the existing treatment is not supported by statute. In consultation with the Office of the Attorney General, we have confirmed this section is referencing course enrollment parameters for the fifth year non-ASCENT program only, and is not referencing funding levels for Concurrent Enrollment in general.

Concern 2: The existing treatment can result in a funding discrepancy with the ASCENT program.

When determining funding, the following is the existing guidance to districts and historical treatment for funding determinations related to ASCENT:

- Full-time funding eligibility: Students must be enrolled in a minimum of 12 semester credit hours at the institution of higher education as of the pupil enrollment count day.

- Part-time funding eligibility: Students enrolled in at least 3 semester credit hours, but less than 12 semester credit hours, at the institution of higher education as of the pupil enrollment count day.

The treatment for ASCENT is based upon Section 22-54-103 (5), C.R.S.ⁱⁱ and 1 CCR 301-86 Rule 2.03ⁱⁱⁱ.

Concern 3: The existing treatment can result in a funding discrepancy when a concurrent enrollment course is delivered at the high school.

Some students may take the class for only high school credit and some students may take the class for high school and college credit. Two high school classes often results in part-time funding based upon scheduled teacher-pupil instruction and teacher-pupil contact and two CE classes usually equals 6 credit hours resulting in full-time funding based upon the existing treatment of CE credits.

Furthermore, currently additional documentation is required for those students enrolled in such classes and seeking dual credit. Districts have expressed concerns about the inconsistent documentation requirements for students enrolled in the same class and not seeking college credit.

Recommendation: The department recommends that the funding determination for Concurrent Enrollment courses be changed as follows:

- Concurrent Enrollment courses delivered at the high school should be evaluated based upon scheduled teacher-pupil instruction and teacher-pupil contact (“contact time”), consistent with other high school courses. This will include the elimination of the additional documentation requirements for any CE courses delivered at the high school, including tuition payment verification and evidence of successful completion.
- Concurrent Enrollment courses delivered at the institution of higher education should be treated consistent with ASCENT: 12 or more credit hours results in full-time funding eligibility and 3 to 11 credit hours results in part-time funding eligibility.

If a student has courses delivered both at the high school which result in part-time funding and Concurrent Enrollment courses at an institution of higher education which result in part-time funding, the student would continue to be eligible for full-time funding. This is consistent with treatment of a student enrolled part-time in two different districts.

Given the planning and scheduling performed to date for the 2014-15 school year, the department intends to implement this change effective with the 2015-16 school year. However, communications of the upcoming change will begin in the near term in order to ensure that districts have adequate notice of the change.

Note: While considering alternative approaches to the funding determination for Concurrent Enrollment courses, the department considered an algorithm to adjust college contact time to reflect an appropriate high school contact time equivalent. As outlined in the endnotes, the department’s exploration of this issue came full circle and resulted in a conclusion that use of the ASCENT treatment was most appropriate.^{iv}

Issue 2 – Funding:

The existing documentation requirement for successful completion for Concurrent Enrollment classes is inappropriately restrictive.

The current treatment is to require documentation of successful completion to retain funding for CE courses. Specifically, the following is the existing guidance to districts and historical treatment for funding determinations related to Concurrent Enrollment:

- If the student fails, withdrawals from a course, or does not receive high school credit as evidenced on the high school transcript, the credit hours will not be counted toward funding eligibility.

The current treatment for CE was based upon Section 22-35-105(4), C.R.S.^v and Section 22-35-104(5), C.R.S.^{vi}.

Concern 1: The basis for the existing treatment is not supported by statute. In consultation with the Office of the Attorney General, we have confirmed this section is referencing agreements between the district and student and institution of higher education, and is not referencing funding eligibility.

Concern 2: The existing treatment is inconsistent with the treatment of classes delivered at the high school and not taken for college credit.

If a student does not receive high school credit (due to a withdrawal or fails pursuant to district policy) for a CE course, an audit exception is taken if the removal of this class reduces the student's funding level, such as from full-time funding to part-time funding or no funding level. This is different than how other high school classes are treated; districts obtain full-time funding based upon scheduled hours (along with enrollment and attendance) as of the pupil enrollment count day, regardless of the final completion results.

Concern 3: The existing treatment is inconsistent with the treatment of ASCENT courses.

Currently documentation of successful completion is not required in order to retain funding for ASCENT courses.

Recommendation: The department recommends that the current documentation requirement for successful completion of Concurrent Enrollment classes be eliminated, matching that of other students where funding is based upon scheduled hours (along with enrollment and attendance) as of the pupil enrollment count day, regardless of the final completion results.

(Note: This assumes the current requirements to evidence attendance. This would change if rule changes are made to allow evidence of successful completion to substitute for evidence of attendance.)

Issue 3 - Attendance:

The Concurrent Enrollment Advisory Board expressed concern with the attendance requirement for CE and ASCENT students. As such, the following guidance was developed by the Board: “Fall term schedules and corresponding transcripts at term’s end shall suffice as documentation for the October 1 enrollment for ASCENT students.”

In consultation with the Office of the Attorney General, we have confirmed this guidance is in conflict with the Public School Finance Act of 1994 (specifically Section 22-54-103 (10), C.R.S.^{vii}) and the Rules for the Administration of the Public School Finance Act of 1994 (specifically 1 CCR 301-39-2254-R-5.03)^{viii} .

The department will continue to enforce existing statute and rules related to attendance. In order to clarify the attendance requirements related to Concurrent Enrollment and ASCENT, the department drafted the attached document, Student October Count Attendance Requirements ASCENT/Concurrent Enrollment, and sample forms. Additionally, training and technical guidance will be provided to districts on this subject.

It is important to note that the issue for attendance documentation does not apply to the majority of Concurrently Enrolled students, who are also enrolled and attending any classes at a district location. This is an issue for those Concurrently Enrolled students who are **only** scheduled for Concurrent Enrollment courses offsite at an institution of higher education, or for those students who are participating in the ASCENT program and therefore only scheduled for courses offsite at an institution of higher education.

Summary:

The following tables summarize the previous treatment and treatment beginning 2015-16 for each of the three issues discussed above:

Previous Treatment					
ASCENT		CE at IHE		CE at District	
FT	PT	FT	PT	FT	PT
12+ credit hours	3-11 credit hours	6+ credit hours	3-5 credit hours	6+ credit hours	3-5 credit hours
Evidence of tuition payment needed		Evidence of tuition payment needed		Evidence of tuition payment needed	
No evidence of successful completion needed		Evidence of successful completion needed		Evidence of successful completion needed	
Evidence of attendance at IHE needed		Evidence of attendance at IHE needed if only enrolled in courses at IHE		No evidence of attendance at IHE needed	

Treatment Beginning 2015-16					
ASCENT		CE at IHE		CE at District	
FT	PT	FT	PT	FT	PT
12+ credit hours	3-11 credit hours	12+ credit hours	3-11 credit hours	contact time	contact time
Evidence of tuition payment needed		Evidence of tuition payment needed		Evidence of tuition payment needed	
No evidence of successful completion needed		No evidence of successful completion needed		No evidence of successful completion needed	
Evidence of attendance at IHE needed		Evidence of attendance at IHE needed if only enrolled in courses at IHE		No evidence of attendance at IHE needed	

Please note that for 5th year, non-ASCENT, students there is a statutory limitation of credits to no more than 9 credits per year, with full-time students limited to 6 credit hours per semester, and part-time students limited to 3 credit hours per semester. There is no statutory limit on credits for ASCENT students and CE students in their first four years of high school.

ⁱ Section 22-35-104(1)(d), C.R.S. states: “Notwithstanding the provisions of paragraph (a) of this subsection (1), if a qualified student is not a participant in the ASCENT program and has not satisfied the minimum requirements for graduation established by his or her local education provider by the end of his or her twelfth-grade year and is therefore retained by the local education provider for additional instruction, the qualified student shall not concurrently enroll in postsecondary courses, including academic or career and technical education courses, that are worth more than a total of nine credit hours, including basic skills courses. Furthermore, the qualified student shall not concurrently enroll in more than:

(I) Six credit hours of postsecondary courses, including academic courses and career and technical education courses, in any academic semester if the student is registered as a full-time pupil in his or her local education provider; or

(II) Three credit hours of postsecondary courses, including academic courses and career and technical education courses, in any academic semester if the student is registered as a part-time pupil in his or her local education provider.”

ⁱⁱ Section 22-54-103 (5), C.R.S. states, in part “.....An ASCENT program participant who is enrolled in at least twelve credit hours of postsecondary courses, including academic courses and career and technical education courses, as

of the pupil enrollment count day of the applicable budget year shall be included in the district ASCENT program pupil enrollment as a full-time pupil. An ASCENT program participant who is enrolled in less than twelve credit hours of postsecondary courses, including academic courses and career and technical education courses, as of the pupil enrollment count day of the applicable budget year shall be included in the district ASCENT program pupil enrollment as a part-time pupil.”

ⁱⁱⁱ 1 CCR 301-86 Rule 2.03:

2.03(3) Pupils enrolled in the ASCENT Program:

(a) A pupil enrolled in the ASCENT program through a Local Education Provider, and who is enrolled and participating in such program on October 1 within the applicable budget year, and who is enrolled in less than twelve credit hours of postsecondary courses, including academic courses and career and technical education courses through such program, shall be counted and included in the district ASCENT program pupil enrollment as a part-time pupil;

(b) A pupil enrolled in the ASCENT program through a Local Education Provider, and who is enrolled and participating in such program on October 1 within the applicable budget year, and who is enrolled in at least twelve credit hours of postsecondary courses, including academic courses and career and technical education courses through such program, shall be counted and included in the district ASCENT program pupil enrollment as a full-time pupil; and

(c) For purposes of funding, a Local Education Provider’s ASCENT program pupils shall be funded on a part-time or full-time basis – based on criteria in 2.03(a) or (b) – pursuant to rates defined by section 22-54-104(4.7), C.R.S.”

^{iv} A summary of postsecondary credit systems identified: “One lecture (taught) or seminar (discussion) credit hour represents 1 hour per week of scheduled class/seminar time and 2 hours of student preparation time.” Alternatively a recent study identified that high school teachers report assigning 3.5 hours of homework per week for each class.

Based upon this data, it may be reasonable to apply a factor up to 1.38^{iv} for courses delivered at institutions of higher education to account for the additional expectation for individual preparation time outside of the classroom. This factor is calculated as follows:

College course: 3 hours class time + 6 hours prep time = 9 hours total time per week
High school course: 3 hours class time + 3.5 hours prep time = 6.5 hours total time per week
 $9 / 6.5 = 1.38$

Note: This treatment, which incorporates student preparation time, could be found to be inconsistent with rule and/or local board of education definitions. Pursuant to 1 CCR 301-39-2254-R-2.06(2), states “Teacher-pupil contact and teacher-pupil instruction means that time when a pupil is actively engaged in the educational process of a district.” The rule goes on to state that each local board of education shall define "educational process" and "supervision of a certified or licensed teacher".

The department obtained a sample of English Composition I and College Algebra course scheduled from seven community colleges (see summary spreadsheet). Using the above factor of 1.38, two interim factors of 1.1 and 1.25 and no factor adjustment, the department calculated the following scheduled hours of numbers of teacher-pupil instruction and teacher-pupil contact. None of the classes met the 90 hours required for part-time funding individually.

		Factor	1.00	1.10	1.25	1.38
			Total Hours per Semester	Total Hours per Semester	Total Hours per Semester	Total Hours per Semester
Institution of Higher Education	Course	Credits				
Aims Community College	English Composition I	3.00	37.50	41.25	46.88	51.75
Arapahoe Community College	English Composition I	3.00	37.50	41.25	46.88	51.75
Colorado Mountain College	English Composition I	3.00	42.50	46.75	53.13	58.65
Community College of Aurora	English Composition I	3.00	37.50	41.25	46.88	51.75
Front Range Community College	English Composition I	3.00	37.50	41.25	46.88	51.75
Pikes Peak Community College	English Composition I	3.00	41.25	45.38	51.56	56.93
Western State Colorado University	English Composition I	3.00	40.00	44.00	50.00	55.20
Western State Colorado University	English Composition I	3.00	40.00	44.00	50.00	55.20
Western State Colorado University	College Algebra	3.00	40.00	44.00	50.00	55.20
Aims Community College	College Algebra	4.00	55.00	60.50	68.75	75.90
Aims Community College	College Algebra	4.00	37.50	41.25	46.88	51.75
Arapahoe Community College	College Algebra	4.00	60.67	66.73	75.83	83.72
Arapahoe Community College	College Algebra	4.00	55.00	60.50	68.75	75.90
Arapahoe Community College	College Algebra	4.00	57.50	63.25	71.88	79.35
Colorado Mountain College	College Algebra	4.00	55.00	60.50	68.75	75.90
Community College of Aurora	College Algebra	4.00	55.00	60.50	68.75	75.90
Front Range Community College	College Algebra	4.00	58.67	64.53	73.33	80.96
Pikes Peak Community College	College Algebra	4.00	55.00	60.50	68.75	75.90

The postsecondary credit system summary also found: “Most lecture and seminar courses are awarded 3 credit hours. Over an entire semester, this formula represents at least 45 hours of class time and 90 hours of student preparation.” The department identified that the full amount of class time and half the amount of student preparation time over the entire semester equals the 90 hours required for part-time funding, which is consistent with the ASCENT funding requirements.

v Section 22-35-105(4), C.R.S. states: “(4)(a) Before paying the tuition for a course in which a qualified student concurrently enrolls, the local education provider in which the qualified student is enrolled shall require the qualified student and his or her parent or legal guardian to sign a document requiring repayment of the amount of tuition paid by the local education provider for the course on the qualified student's behalf if the qualified student does not complete the course for any reason without the consent of the principal of the student's high school.

(b) If a qualified student concurrently enrolled in a course for whom a local education provider pays tuition does not complete the course for any reason without the consent of the principal of the high school in which the qualified student is enrolled, the qualified student or the qualified student's parent or legal guardian shall reimburse the local education provider, as provided in the document signed pursuant to paragraph (a) of this subsection (4), for the amount of tuition paid by the local education provider for the course.

(c) A local education provider may adopt a policy that requires a qualified student and his or her parent or legal guardian to sign a document prior to the student's concurrent enrollment in a course, which document commits the student or his or her parent or legal guardian to reimburse the local education provider for the tuition paid by the local education provider for the course in the event that the student receives a failing grade in the course.”

vi Section 22-35-104(5), C.R.S. states “A course successfully completed by a qualified student through concurrent enrollment at an institution of higher education shall count for credit toward the qualified student's high school graduation requirements at his or her local education provider.”

^{vii} Section 22-54-103 (10), C.R.S. states “(10) (a) (I) "Pupil enrollment" means the number of pupils enrolled on the pupil enrollment count day within the applicable budget year, as evidenced by the actual attendance of such pupils prior to said date, except as otherwise provided in subparagraph (II) of this paragraph (a), plus the number of pupils expelled prior to the pupil enrollment count day within the applicable budget year who are receiving educational services pursuant to section 22-33-203 as of the pupil enrollment count day of the applicable budget year.”

^{viii} 1 CCR 301-39-2254-R-5.03 states “A pupil shall be in "attendance" if one or more of the following apply. 5.03(1)The pupil attends school for all or any portion of the pupil enrollment count date or of the alternative count date, except as provided below.” The remainder of Rule 5.03 outlines detailed requirements, for newly enrolled students, students in attendance on days other than the pupil enrollment count date, transferred students, suspended students, expelled students, truant students, and drop out students.