

# SUPPLEMENTAL MATERIALS

## Special Called Board Meeting AGENDA ITEM VI-A (11)

Consideration and possible action to adopt new Board Rule Chapter 4, Subchapter D, 4.86 concerning the establishment of College Connect Courses

RECOMMENDATION: Approval

Background Information:

The Texas Higher Education Coordinating Board proposes new rules in Texas Administrative Code, Title 19, Part 1, Chapter 4, Subchapter D, Section 4.86, establishing the College Connect Courses program in rule.

This rule establishes the College Connect Course framework, allowing institutions of higher education to offer high school students supportive college-level coursework through either the dual enrollment or dual credit modality. This rule provides institutions with an optional framework within existing parameters of law.

Dr. Jennielle Strother, Assistant Commissioner for Student Success, will present this item and be available to answer questions.

Date Published in the *Texas Register*: June 16, 2023.

The 30-day comment period with the *Texas Register* ended on: July 16, 2023.

There were five comments received regarding this rule. The Coordinating Board made edits to the proposed rules based on these comments.

***Comment 1 from Tarleton State University:***

Tarleton State University submitted a public comment on behalf of the Tarleton Today Dual Enrollment Program. The Program stated they began a program for Dual Enrollment at Tarleton State University. The Program offered four courses in our inaugural year of 2023-24, two of which could be on the cusp of being considered non-core. The courses of Agricultural Economics and Animal Science could be considered non-core at first consideration; however, the Program comments that Animal Science in many State-funded institutions is accepted as a four-hour science requirement. The Program requests that Agricultural Economics should be considered a core subject requirement for Economics moving forward. The curriculum is extremely challenging and has proven to be one of the most rigorous courses on our home campus.

***Response 1:***

The Coordinating Board appreciates this comment and notes that requests for changes to an institution's core curriculum courses are managed through the agency's approval process (<https://www.highered.texas.gov/our-work/supporting-our-institutions/institutional-resources/transfer-resources/texas-core-curriculum/>).

Regardless of whether the course is offered as a dual credit or dual enrollment course, a College Connect Course must be in the core curriculum of the institution providing the credit.

***Comment 2 from San Jacinto College:***

1. Regarding subsection 4.86(b), the college presents the following questions for clarification: how does "supportive integrated skills curriculum" relate to co-requisite courses or student success courses? Are they similar? Is "College Connect" perhaps the application of those concepts directly to core curriculum courses? If not, and the content is intended to be added to existing courses, how is this different from existing "supplemental instruction" programs at various institutions? If additional content is to be added to a course, how is that expected to affect contact hours and credit hours of those courses?
2. Regarding subsection 4.86(c), the college states students must be college-ready or show exemption from that statute as non-degree-seeking or non-certificate seeking students. The college asks for clarification if students are previously college-ready, what is expected of "supportive integrated skills curriculum" that is beyond the scope of what many institutions already do to support students, e.g., library instruction, tutoring centers, embedded tutors, supplemental instruction?
3. The college requests clarification as to whether students are exempt from the college-ready requirement because they are non-degree seeking or non-certificate students, how is that or will that be reconciled with other rules or regulations that require all dual credit students to be on a degree or certificate or pathway?
4. Related to subsection 4.86(d), the college comments that institutions will provide "supplemental instructional content" to support students "who have not yet demonstrated readiness" in core curriculum courses, and asks whether the proposed rules only apply to core curriculum courses with lower, pre-requisite "college readiness" levels (required reading and math levels)? The college asks if the rule is intended to apply to the entire core curriculum, how are students that are not explicitly college-ready expected to enroll in a course that explicitly requires students to be college ready? Do the proposed rules suggest that college readiness levels be waived for students in order to provide "College Connect" courses?
5. The college comments that subsection 4.86(f) describes "students enrolled in these courses must finish with two grades. . . and encourages institutions to. . . provide maximum latitude to drop the college-level component," and asks whether this a state-wide implementation of the On Ramps model for dual credit/enrollment?
6. The college notes that subsection 4.86(g) mentions "formula funding," and asks how are these rules affected by the new community college funding model?

***Response 2:***

The Coordinating Board appreciates these comments and provides the following responses.

1. Integrated skills curriculum objectives are generally not outlined in college-level learning outcomes but are supportive of students' learning and mastery of those learning outcomes. Examples of integrated skills curriculum that are recommended under the rule may include an aligned corequisite model, supplemental instruction, digital learning modules (i.e., D2S2), and student success courses. An institution should provide integrated curriculum in addition to the college-level course content that is aligned in support of such content to help ensure underprepared students' successful mastery of the college-level content. The college-level component should adhere, at minimum, to the learning outcomes and contact hours as outlined in the Lower-Division Academic Course Guide Manual.
2. For college-ready students, there is no further expectation of integrated skills curriculum beyond what institutions already do to support students.
3. A student who has successfully earned 14 semester credit hours or fewer of dual credit courses at a public institution of higher education is not required to file a degree plan with the institution (as outlined in TEC 51.9685(c-2) and TAC Chapter 4, Subchapter T, Rule 4.344) and may be considered non-degree seeking. The proposed Chapter 4, Subchapter D, Rule 4.86, applies only to a student who has not earned more than 14 semester credit hours of college credit at an institution of higher education and would not be required to file a degree plan with the institution.
4. To clarify, college readiness requirements (i.e., TSI) apply only to entry-level college courses that the institution offering the course determines to be reading/writing or math-intensive. The *Lower-Division Academic Course Guide Manual* outlines which courses require additional pre-requisite(s) for students enrolling in those courses. Through the non-degree/certificate seeking exemption, a student who otherwise may not have access to college courses may experience college courses while also receiving additional support to help ensure the student's success in gaining high school and potentially also college credit.
5. Institutions should determine the appropriate latitude to grant when establishing policies with regard to College Connect Courses, and are encouraged to adopt policies that provide maximum latitude to students enrolled in dual credit and dual enrollment courses. Institutions should also consider SACSCOC and other applicable policies (e.g., National Alliance of Concurrent Enrollment Partnerships) when making those determinations. OnRamps dual enrollment courses and some colleges' dual credit course offerings already incorporate models where grading for high school course credit is separate from grading for college credit. The experiences of institutions taking this approach suggests that this separation can benefit both students and institutions, for example, by allowing students to earn high school credit even if they are not able to earn college credit for a course.
6. While the Coordinating Board anticipates that College Connect Courses offered as dual credit courses will likely be funded in the same way as other dual credit courses with regard to the new community college funding model, especially with regard to students' completion of 15 hours that apply to academic or workforce programs, it

should be noted that rules and policies with regard to the funding model are still under consideration and have not been finally adopted by the Board.

***Comment 3 from McLennan Community College:***

McClennan Community College comments that in subsection (f)(3), the word “drop” should be replaced by “withdraw” to align with THECB terminology. Student Drops are handled before census and are not reported, withdraws are after census as they include students who have been reported to the state.

***Response 3:***

The Coordinating Board agrees with this comment. The Coordinating Board has revised subsection (f)(3) to address this recommendation.

***Comment 4 from College of the Mainland:***

College of the Mainland offered the following comments on the proposed rule changes, specifically the eligibility requirements.

1. Only non-degree seeking students: this eliminates ECHS students as the designation of an ECHS program specifically states students will earn a degree or 60 credit hours toward a degree. This group could benefit from these courses and potentially increase the number degrees earned. Currently we can only offer ECHS students a few courses (EDUC 1300, SPCH, Fine Art) until they pass the TSI. Students who are not college ready by the beginning of their junior year cannot move forward and will not complete a degree because the remaining courses have college readiness requirements. Allowing the ECHS students to take a college course under this rule would help a significant number of make progress toward their degree.
2. The college comments that the limitation on students who have earned more than 15 SCH would eliminate that participation of students who have earned credits in ENGL, HIST, GOVT but are not yet college ready in math. The rule, as drafted, would require a student to enroll in a College Connect Course for math prior to earning 15 SCH. The college notes that they have students that could potentially graduate from high school being core complete if they were eligible to take a college math class. The college notes that it appears to be the intent to have students take the College Connect course early so they can take additional courses to reach the goal of earning at least 12 SCH; that makes sense for reading/writing courses but not for math courses.

The college requests clarification on the following questions:

3. What criteria should be used to determine which students are eligible for the College Connect course? Would it be like the multiple measures (GPA, grades in ENGL or MATH) that we use with traditional students? Should the college use the same criteria that they currently use for co-req courses? Does the college set the criteria or will THECB provide criteria?

4. Every initiative comes with a request to report results. How should we track and report outcomes for dual credit students in a regular college course vs. a College Connect course?
5. Will the courses remain 48 contact hours? If the contact hours increase, how will the courses fit into the schedule at the high schools or at COM?
6. When are colleges expected to implement the new College Connect course?

***Response 4:***

1. The Coordinating Board respectfully disagrees that a student must be college ready in order to access dual credit courses but does agree that access to the college course experience will increase under this new program. While Chapter 4, Subchapter G, Rule 4.155, requires that an ECHS be assessed using an instrument otherwise approved by the Board for Texas Success Initiative purposes, Rule 4.155 also states that the student must meet eligibility requirements in accordance with Rules 4.81 - 4.85 to enroll in college level courses for dual credit. Rule 4.85 requires that a student demonstrate readiness prior to enrollment in academic dual credit, as outlined in subsection (b). Under Rule 4.85, however, a student is not required to be “college-ready” (i.e., TSI-met/TSI-complete) in order to enroll in dual credit courses. High school students are able to access dual credit courses through indicators not outlined in TSI statute but authorized under Rule 4.85, including English II EOC, Algebra I EOC + Algebra II grade, PSAT/NMSQT, and PLAN/ACT-Aspire scores. Students who access dual credit courses using these indicators and who successfully complete the course with a grade of A, B, or C will be considered and reported as TSI-met/TSI-complete in the applicable subject area(s). Also, students with fewer than 14 SCH who are non-degree/non-certificate seeking will have increased access to the college course experience by taking College Connect Courses.
2. Education Code §51.9685(c-2) requires all students to file a degree plan with the college “at the end of the second regular semester or term immediately following the semester or term in which the student earned a cumulative total of 15 or more semester credit hours of course credit for dual credit courses successfully completed by the student.” Once students file a degree plan, they are considered degree seeking, and must demonstrate meeting college readiness standards to enroll in dual credit or dual enrollment courses.
3. Institutions offering College Connect Courses for students who are non-degree/non-certificate seeking and have not met indicators outlined in Rule 4.57 or an exemption outlined in Rule 4.54 may make their own determinations about which eligibility requirements are appropriate. Institutions are encouraged to consider students' career interests and academic pathways in their determination. Subsection (c)(3) has been added to the rules to clarify this option.
4. The Coordinating Board is studying how best to require reporting and tracking for College Connect Courses and will provide more details as they become available.
5. Each institution offering College Connect Courses may determine the appropriate contact hours to ensure the college-level content and supplemental college readiness content, as applicable, are addressed. Institutions should collaborate with their school district partners to address considerations to ensure students receive

high school credit towards graduation requirements and articulate agreed-upon practices and policies in the agreement between the school district and institution, as required in subsection (f)(2) and according to Rule 4.84.

6. College Connect Courses are optional for institutions to implement. The Board will consider this rule for adoption during the August 24, 2023, board meeting.

***Comment 5 from The University of Texas at El Paso:***

The University of Texas at El Paso offered the following comments requesting clarification about the applicability of the rules:

1. Can institutions set their own requirements for students to participate in the co-requisite courses?
  - a. For example, UTEP requires that students take the TSIA and have a diagnostic level 5 for placement into the co-requisite courses. Why would high school students with a lower TSIA score than what we require at UTEP be allowed to participate in College Connect? Is this a policy to be worked out by community colleges, universities, and ISDs?
  - b. Should students who are freshmen and sophomores be college ready? They have not taken all their required math - it makes sense they are not college ready. Should there be a requirement for this class to be offered as a Junior or Senior?
2. Adding this program would mean that there are five paths for students to take college level courses at the high school level: ECHS, Dual Credit, College Prep, Texas College Bridge, and now College Connect, correct? It is my understanding that these programs are run via Community Colleges primarily. Universities may not have a strong voice in how and what is offered. How will this be addressed?
3. Will this require an MOU with each of the ISD's?
4. Institutions offer different types of co-requisites with different college level courses. The structure, content, pedagogy, and curriculum are different. For example, UTEP offers a co-requisite with Math 1320, not Math 1342. How will this impact the students who enter our institution?
5. If school districts receive funding for each college ready student, would they not then require most or all students to enroll in the college connect course? This has multiple implications:
  - a. The rule states in the Government Growth Impact section that it will not require the creating or elimination of employee positions. Is this true? If co-requisite courses are offered in the high school would institutions need to eliminate Developmental Math/English positions?
  - b. This then leads to the question that if most of the students take this course and receive college level credit, why would they need to take Algebra 2 or Geometry? They already have college credit.
  - c. Additionally, students who take the college-level course from high school teachers who are credentialed to teach college-level courses have a lower success rate than students who take the college-level course from college instructors. How are universities and community colleges going to serve the multitude of districts/students?



**Response 5:**

1. Yes, institutions may determine which eligibility requirement(s) are appropriate for high school students enrolling in the College Connect Course. These requirement(s) may include aligned corequisite models as the required college readiness content for students entering without meeting the requirements in Rule 4.57 or exemptions in Rule 4.54 (i.e., the students are classified as non-degree seeking). We have added new subsection (d)) to clarify this allowance.
  - a. Institutions may determine which eligibility requirement(s) are appropriate, as addressed above.
  - b. As part of their considerations for eligibility requirements, institutions may determine if certain grade-level eligibility is an appropriate requirement.
2. To clarify, the pathways for students to earn college credit at the high school level are: ECHS, Dual Credit, Dual Enrollment, College Connect Courses, and testing options like AP, IB, and CLEP. These pathways to earn college credit while in high school, including the College Connect Course option, are available to Texas public institutions of higher education, including both community colleges and universities. Please note that Texas College Bridge is a type of College Preparatory Course that may result in a TSI exemption, but not college credit as referenced in Texas Education Code 28.014 and Rule 4.54 (a)(10).
3. Yes, Rule 4.86(f)(2) requires that institutions must enter into an agreement with the secondary school, pursuant to Rule 4.84.
4. Rules regarding the transferability of a dual credit course are not impacted by the rules proposed under Rule 4.86.
5. The Coordinating Board notes that it is optional for an institution of higher education to offer this course model. It is not required by these rules. Further, a school district may determine which options are appropriate for their students to have access to postsecondary opportunities, including the College Connect Course option.
  - a. The institution choosing to offer the College Connect Course may use corequisite models as the college readiness content required for students who enroll without meeting one of the benchmarks in Rule 4.57 or an exemption outlined in Rule 4.54, including the non-degree seeking designation. As with all corequisite model planning, the institution may determine which faculty member or instructor is appropriately qualified to teach the corequisite component. Whether teaching positions are impacted is also an institutional determination.
  - b. The school district may determine how access to and completion of dual credit courses impact the students' completion of state required credits for high school graduation.
  - c. Institutions are encouraged to consider their capacity to offer high quality postsecondary options for students when determining whether to offer such programming. Institutions may access technical assistance offered by THECB in developing and providing these courses as authorized by Rule 4.86(e).

CHAPTER 4:  
RULES APPLYING TO ALL PUBLIC INSTITUTIONS OF HIGHER EDUCATION IN TEXAS

SUBCHAPTER D:  
DUAL CREDIT PARTNERSHIPS BETWEEN SECONDARY SCHOOLS  
AND TEXAS PUBLIC COLLEGES

§4.86. Optional Dual Credit or Dual Enrollment Program: College Connect Courses.

(a) Authority. These rules are authorized by Texas Education Code §§28.009(b), 130.001(b)(3) - (4), and 130.008.

(b) Purpose. The purpose of this rule is to encourage and authorize public institutions of higher education to deliver innovatively designed dual credit or dual enrollment courses that integrate both college-level content in the core curriculum of the institution alongside college-readiness content and skills instruction. These innovatively designed courses will allow students the maximum flexibility to obtain college credit and provide integrated college readiness skills to students who are on the continuum of college readiness and will benefit from exposure to college-level content.

(c) Student eligibility. An eligible student must be enrolled in a public school district or open-enrollment charter as defined in Texas Education Code §5.001(6). An institution of higher education may offer College Connect Courses to:

(1) A student who has met the college readiness standards set forth in subchapter C, §4.57 of this chapter (relating to College Ready Standards); or

(2) A student who has not yet demonstrated college readiness by achieving minimum passing standards set forth in §4.57 of this chapter, if the student is:

(A) a non-degree-seeking or non-certificate seeking student under Texas Education Code §51.338(a); and

(B) has earned not more than 14 semester credit hours of college credits at an institution of higher education; or

(C) a student who is otherwise exempt from the Texas Success Initiative, as set forth in subchapter C, §4.54 of this chapter (relating to Exemptions, Exceptions, and Waivers).

(d) An institution may add eligibility requirements for students qualifying under subsection (c)(2)(A) and (B) of this section.



(e[~~e~~]) Course content. The following standards apply to delivery of College Connect Courses offered under this rule:

(1) An institution of higher education may offer College Connect Courses within the institution's core curriculum in accordance with subchapter B, §4.28 of this chapter (relating to Core Curriculum).

(2) An institution of higher education must also incorporate supplemental college readiness content to support students who have not yet demonstrated college readiness as defined in §4.57 of this chapter within these courses. An institution may deliver this supplemental instruction through a method at their discretion, including through embedded course content, supplemental corequisite coursework, or other method.

(f[~~e~~]) Coordinating Board staff may provide technical assistance to public institutions of higher education and secondary schools and districts in developing and providing these courses.

(g[~~f~~]) Additional Academic Policies.

(1) College Connect Courses offered through dual credit or dual enrollment must confer both a college-level grade and a secondary-level grade upon a student's [~~students'~~] successful completion of the course. A grade conferred for the college-level course may be different from the secondary-level grade, to reflect whether a student has appropriately demonstrated college-level knowledge and skills as well as secondary-level knowledge and skills. An institution may determine how a student enrolled in this course may earn college credit, whether through college-level course completion or successful completion of a recognized college-level assessment.

(2) An institution of higher education must enter into an institutional agreement with the secondary school according to §4.84 of this chapter (relating to Institutional Agreements) to offer College Connect Courses.

(3) An institution of higher education is strongly encouraged to provide the maximum latitude possible for a student to withdraw from [~~drop~~] the college-level course component beyond the census date, while still giving the student an opportunity to earn credit toward high school graduation requirements.

(4) Hours earned through this program before the student graduates from high school that are used to satisfy high school graduation requirements do not count against the limitation on formula funding for excess semester credit hours under chapter 13, subchapter F, §13.104 of this title (relating to Exemptions for Excess Hours).

(h[~~e~~]) Funding and Tuition. For College Connect Courses offered through dual credit under this option:

(1) An institution of higher education may receive formula funding for College Connect Course semester credit hours in accordance with Texas Education Code §61.059 and chapter 130, subchapter A, and any Coordinating Board rules that authorize funding for courses offered under this section.

(2) An institution of higher education may waive a student's tuition for College Connect Courses in accordance with Texas Education Code §§54.216 and 28.0095.