

**ARSD 24:43:11:17 Transcription of Postsecondary Credits on the High School Transcript
Public Comment as of May 19, 2023**

Below follows the public comments received via rules.sd.gov. There are 17 opposed with no proponent comments received. No additional public comment was received.

Date Submitted	Last Name	First Name	Role	Affiliation	Town	Proponent or Opponent
05/19/2023	Morford	Steve	Educator		Spearfish	Opponent
<p>Problems with awarding one credit for college classes: (should be set at .5 not 1.0) • Hours are not equivalent o A college class meets 60 minutes 3 days a week = 180 minutes (360 for 2 weeks) o At SHS High school class meet 90 minutes 5 times over a 2-week time frame (450 minutes) • Days are not equivalent o College semester starts later and ends much earlier than high school classes • Putting one credit on the transcript for college classes has the distinct possibility of messing up each school’s graduation requirements and graduation process causing schools to adjust credits needed to graduate. Is it the goal to graduate kids from high school earlier? Changing to 1 credit has the possibility to do that and that should not be the case. • Have you looked at the syllabus of each college class? Will each 1 semester class that will be granted 1 credit cover all the state standards in each subject area? i.e. American History If you decide to give 1 credit, will the schools currently giving .5 have time to adjust registration handbooks and other related policies? If changed to 1 credit, schools will need at least one academic year to make adjustments.</p>						
05/19/2023	Murphy	Jill	Educator		Spearfish	Opponent
<p>If the new dual credit status changes to one credit per dual credit class: 1. Will students fulfill their one year of history requirement by taking one dual credit class. If so... students will NOT learn what is taught in HIST 152 or US History B. Same is true if students take a dual credit class in English. By earning one credit in ENGL 101- by this proposed change they will not have to take the 2nd semester of English. Does the curriculum in college classes line up with state standards. *By earning one credit: students can graduate possibly incredibly early. Many students (seniors) struggle with having to take classes "they don't need" if they have already met their graduation requirements. *Hours in college classes are not equal to time in our high school classes. Our students are in classes 450 minutes over a two week time frame (block schedule). Dual credit classes meet approximately 360 minutes over the same two weeks. I believe this rule has to do with the SD Opportunity Scholarship not what is best for the education of our students. Not all students are able to academically or financially able to take dual credit which creates an uneven playing field. I advocate STRONGLY for leaving the system as is. If you must require a standard credit number per dual credit class, I believe STRONGLY to leave it at .5 credits.</p>						

05/18/2023	Engel	Roxann	Educator		Rapid City	Opponent
<p>May 16, 2023 Dear South Dakota Board of Education: As a school counselor, with over 20 years of experience, I'd like to express my concern for the proposed rule change 24:43:11:17 because of the passing of SB 182; specifically, the transcribing of three post-secondary credits as one high school credit. The proposal to grant a full high school credit for a semester-length, three-credit college course creates two primary concerns. First, this credit conversion is not equitable. A college degree requires 120 credits. Therefore, a three-credit college course is 1/40 (or 2.5%) of that degree. Whereas the state high school graduation requirement is 22 credits, making one credit 1/22 (4.5%) of a high school diploma. Prior to this bill and proposed law, Stevens High School has granted one-half credit for each three-credit post-secondary course. This formula is more equitable, computing to .5/22 (2.45%) of the high school diploma. The seat time for instruction with these courses is also not equitable. In South Dakota, a student is required to have 72.5 hours of seat time to earn .5 high school credit. Students receive substantially less seat time to earn one full high school credit for a three- credit college course; particularly since college courses meet only three hours a week or are often online. The second area of concern is the negative impact this policy would have on AP (Advanced Placement) programs state-wide. By adopting this policy, the number of students taking AP courses will drop significantly. Districts that currently give one credit for three-credit college courses have already seen a decline in their AP numbers. It will be difficult to get students to commit to year-long one credit high school AP courses when they can do a one-semester dual credit course for the same credit. AP courses provide a strong foundation for future college rigor and are taught at the college level by teachers trained in the art of education, unlike college instructors. Many universities articulate preferring students have exposure to AP courses, and often encourage a combination of AP and dual credit courses. A uniform policy for granting high school credit for post-secondary coursework needs to be established to be equitable for students state-wide. However, a three-credit college course equivaling .5 high school credit is in the best educational interest of students and would preserve AP programs. Sincerely, Roxann Engel Lead School Counselor Stevens High School</p>						
05/18/2023	Niederbaumer	Cindy	Educator		Huron	Opponent
<p>As a school administrator, I can be in favor of unifying the .5 or 1 credit for the dual credit courses. I think that is helpful for all school districts to give the same weight of credit. I am not in favor of requiring that all high schools have to give high school credit for all college level course work. I don't want to deny my students the opportunity, but I also want to make sure they are receiving an education that aligns with our high school mission and goals for teenagers. With the proposed requirement, I would be signing diplomas that could potentially have many college level credits on it. There is no accountability to the higher education institutes on student performance like there is for the high school. I do not want my students to essentially be able to "skip" high school courses and fill their years with college courses. Please allow the local control of this decision to stay as is.</p>						

05/10/2023	Van Zee	Courtney	Educator	Miller	Opponent
<p>I am writing in regards to my concerns about requiring that 3 credits of dual credit coursework count as 1 full high school credit. Miller High School currently awards 0.5 credits per semester course because every course in our building is worth 0.5 credits per semester. This allows us to require 22 total credits for graduation and allow opportunities for all students to graduate in a 4 year span. We do not award quarter credits. There is nothing in the SD High School graduation requirements that can be satisfied with a quarter credit. Dual credits on OUR transcript are high school credits. Just as I would not presume to decide how many credits classes at a university should count for, I believe we should have that autonomy in our building. In addition, if a student transfers here from High School A, and High School A chose to give them 1 full credit for a dual credit semester course, then I would honor that because it is THEIR academic record, not mine. We have done a great deal of work over the years to choose why we award things the way we do within the state mandates for high school graduation requirements, and made those decisions based on what is right for our school and our kids. I'm not sure why we need to change things that are working. Things I'm concerned about happening if I have to award 1 full credit for a semester for – example - Eng 101: 1. People will opt out of my senior English course, which is 2 semesters long and only offers 1 credit for the full year. Frankly, my senior English is far more rigorous than Dual Credit Comp, and now they'll get 1 credit, while my kids who are NOT eligible for or can't afford dual credit work their proverbial tail off for 0.5? 2. My AP courses are currently weighted at 1.25. If Jane takes AP English all year and earns 1 credit, and Joe takes 1 semester of English 101 and earns 1 credit, it essentially cuts the weight of my AP course in half. 3. I'll have a number of kids trying to do early graduation, and while that can be a very valuable option for the right kids, I am concerned that many of my students need the extra time in our building to be prepared for college. We have enjoyed an excellent matriculation and retention rate from our high school, and I fear that would decrease sending kids out the door before they are ready. 4. The leg work for dual credit is already hefty on my end. I envision the worst case scenario of having to help kids apply to 4 different universities for dual credit English 101 because SDSU is full. What if my senior English teacher didn't have enough kids for a section, so we've reassigned or RIF'ed her? We have a difficult time finding teachers in the first place without this added obstacle. I want my kids prepared for the rigors and demands of the workforce and higher education. I already I believe we are doing that, and doing it well. So what's the solution to the disparities in our building if this change is, in fact, mandated? We change our own high school credit calculation and offer 1 credit for our in-house senior English and other courses? There's nothing to stop high schools from doing this. But, the domino effect recalculating everything in Infinite Campus will be an unnecessary nightmare. I advocate for leaving the system as is, but if you must require a standard credit number per course, I implore you to leave it at 0.5. 0.5 credits is the standard number for a semester long high school course our part of the "duo" should be our choice. Thank you for your time and consideration, Courtney Van Zee, MS, NCC 7-12 Professional School Counselor District Testing Coordinator District EL Coordinator Infinite Campus Administrator & Registrar Miller School District 29-4</p>					

05/09/2023	Sheehy	Geoffrey	Educator		Rapid City	Opponent
<p>I have taught AP English language and composition for more than a decade in Rapid City (at Central High School), which gives me an inside view of the students most likely to seize the full effects of this rule change. If this rule goes into effect, possibly a majority of my AP students would forego their high school English instruction for 11th and 12th grade, instead taking dual credit classes through the SDBOR or our local technical college (WDT). And from their perspective, why shouldn't they? They and their families are likely to reason that they can take two semesters of college instruction and free up an entire year of their schedule, which time they could use to take more dual-enrollment or to graduate high school early. My concern is that these students will lose instruction from high school teachers. High school juniors are distinctly not college freshmen--they lack the maturity, the study-skills, and the resilience needed to thrive in the next steps of their lives. They will develop these things--they almost always do--but they develop them while making mistakes along the way, traditionally in the environment of a high school classroom, where teachers give them more feedback and life lessons than a college professor ever will. This is not to criticize college professors, it is to admit there is a difference between curriculum and instruction designed for 18 and 19-year-old college students and 15-year-old high school students. But families are under tremendous pressure to reduce their college costs and will almost assuredly attempt to reduce them by enrolling their students in college classes they're not prepared for in place of high school classes specifically designed for them. Yes, my students are in AP classes that cover college-level material, but they take a year to cover what college covers in a semester, and I teach it to high school students, which means I teach it differently than I would if I taught it at an SDBOR school. I fear that the consequences are not fully understood and we will undercut our aims in public education. This simple policy change will incentivize dual-enrollment at the cost of high school instruction and will not benefit these students in the long-run.</p>						
05/09/2023	Andrews	Camille	Educator		Rapid City	Opponent
<p>As a high school teacher for the last 10 years and the parent of a student entering high school next year, I would like to share my concerns with this proposal. Currently, the district that I belong to, awards .5 high school credits for a semester long dual enrollment. Making a change in which students earn a full credit for a semester long credit means that students will not be challenged in the same way that students not taking dual enrollment classes will be. For example, if a senior student is normally required to take a year-long English class that fulfills both composition and literature standards, this new rule would allow a student to replace this rigorous high school course with a semester long dual enrollment course that would only cover one of those two topics. Students who are short-changed in this way will then be less prepared for college -- the opposite of the intended outcome for dual enrollment. In addition, in the short time that I have been aware of this proposed change, I have yet to find a high school staff member that believes this is a change that will be in the best interests of the students. In addition I have heard several people voice their concerns not just for the unintended impact for students, but the ways in which it could impact individual local schools. I have yet to see any information explanation where this proposed change originated, and who is advocating for this particular outcome and their reasoning for it. From my perspective as a parent and educator who has spoken to colleagues (both fellow educators and high school counseling staff) about the issue, I have not yet heard or seen any positive feedback on this proposal, which begs the question -- where did the push to make this change come from? Should it not come from the very people who work with the students that will be affected by the change -- people with boots on the ground who can clearly see the way this will impact the very real students they are working with? Please consult with these experts both at the high school level and with dual credit college admissions representatives before making a change that might have such a long lasting impact on the students of South Dakota.</p>						

05/05/2023	Lloyd-Smith	Laura	Educator		Spearfish	Opponent
<p>As a school counselor for 25 years, I am saddened to learn of ARSD 24:43. I believe this is not in the best interests of students or school districts. Let me tell you why: Currently, in my district, we award .5 high school credit for each 3 or 4 credit hour college class (one semester). This means that to earn a whole credit (1.0) of English credit during a student's senior year (often when they take dual enrollment), the student will be in a college class both semesters or one college class followed by one high school class, equating to two semesters of English or 1.0 credit. The decision to award .5 credit is in our local district school board policy. Using the proposed idea, a student would only be required to take English ONE semester and fulfill the entire 1.0 credit needed for high school graduation. This means that a student could potentially only take a year long English class their freshman and sophomore years and then take two college classes, which would equate, using the proposal, to 4.0 credits of high school English. By creating the statewide uniformity and removing local control, this new policy will have-- in effect-- dumbed down the ELA requirements to graduate high school in SD. I do not believe that was ever the intent of the HSDC program and am saddened to see it go in this direction. I have talked to not one high school counselor in my regional area that agrees that this is a good idea and nearly all feel it will be to the long range detriment of the student. Moreover, I have recently reached out to a number of dual credit college admission representatives from around the state. Likewise, they are not in favor of this proposal. Given this, I have to wonder where this idea stemmed from and why no significant stakeholders were included in the proposal. High school counselors around the state work daily with students and parents, promoting, encouraging and advising them about the benefits and options related to DE, which reach far beyond how much high school credit an individual local district chooses to award a student for each college class. The Board of Education would be well advised to ask those who work with the program for input in an effort to see the bigger picture. This is a decision that should remain at the local level and we should be allowed to maintain a level of integrity with our graduation requirements whether that applies to history, science, math or English. OR at the very least those that work with dual credit on a regular basis should be part of the conversation in how this works moving forward.</p>						
05/04/2023	Norton	Jerry	Educator		Colome	Opponent
<p>To those with final approval for ARSD 24:43(Dual Credit)/ Department of Education I'm writing to ask you to reconsider the implementation of ARSD 24:43. It appears that in effect, students could easily meet the state's graduation requirements in 2 years and graduate after their Sophomore year. The saving grace is that students cannot take Dual Credit until they are Juniors. With that in mind, this measure provides a way for students to graduate en masse after they finish their Junior year of High School. Part of the issue that we foresee is that if schools desire to keep students all four years, then this will force high schools to change their requirements to graduate that are beyond the state's requirements.... I ask you earnestly to reconsider putting this plan into effect. At the very least, delay the implementation a school year so that the state legislators, the DOE, and individual schools can come up with a better system for Dual Credits receiving credits on a High School transcript. Sincerely, Jerry Norton Citizen of South Dakota k-12 School Counselor, Colome, SD</p>						

05/03/2023	McMeekin-Hemmingstad	Christine	Educator		Elk Point	Opponent
<p>High schools should prepare students for college. Students should take higher level classes in high school to prepare for the rigor of college classes, especially in the areas of math and science. High Schools no longer have a say in the quality of education and content if students can take college classes to replace high school classes. How will this impact state testing scores? How can schools be accountable for state testing results when we don't control the content of the courses they take? Lower end students are left in general education classes at the high school level. This imbalance is not good for students. There are not that many general education courses for students to take. Many schools do not have room in electives for students, and having students take more dual credit courses does not make sense. A lot of research points to the fact that college students change their major three times. This means students will accumulate a lot of extra classes. We do not need to have students accumulate college elective classes in high school. Taking online classes takes students out of the classroom with actual teachers that care about them and their education. This connection and support are lost. Given the large number of mental health issues our students have, this is not a step in the right direction. Schools will need to increase the number of credits needed or change policies just because of these suggested policy changes. At EPJ we require students to take a full load each semester (6 classes). We would be forced to re-think this just because of this policy. We also put limits on who can take classes like ENGL 101 to replace our English IV. We have these in place for a reason. South Dakota has open enrollment. If a student doesn't like one school's policies, they can change schools.</p>						
05/03/2023	Bubbers	Sue	Educator		McIntosh	Opponent
<p>To Whom It May Concern, As a school counselor I have concerns about counting 3 credit hour dual credit courses as 1 full credit at the high school level. We are trying so hard to continue to incorporate rigor in our high school schedules. If we are forced to give a full credit to Math 114, for example, students do not need to take another semester of math to complet a full credit toward graduation and toward Regents Scholar/South Dakota Opportunity Scholarship attainment. With this being the case, they can then take elective classes that do not strenghten their academic skills as much as having to take more of the core content courses. Furthermore, it will enable students to graduate earlier from high school without as many total courses completed. I believe we will be graduating students who are not as prepared for the academic rigors of college and the work force because of this. Our upper level math courses at MHS are as rigorous as this Math 114 and we only give 1/2 credit per semester. It only seems fair that we should give 1/2 credit for Math 114 as well. Thank you for your time and consideration in this matter. We are strong proponents of the dual credit program, we just would like to continue with our current policy of submitting credit toward graduation. Sue Bubbers</p>						

05/02/2023	Avery	Dadra	Educator		Sturgis	Opponent
<p>Hello, I have been a high school counselor for 20 years. I am not against the concept of consistency in college credits between high schools, however, below are reasons that 3 credit college courses should be equivalent to .5 high school credit. Most AP courses are yearlong courses or 2 semesters and students receive 1 high school credit, yet students only earn 3 credits at the college level. The seat time for this course is 120 hours for a 3 credit course. This is twice as much time as we give for any other college course and would be 4 times that with the recommendation of requiring all high schools to give 1 full credit for Composition 1. Seat time for colleges is 45 instructional hours for 3 credit courses. For grades 6-12 the SD DOE requires 962.5 instructional hours. If you divide this by 2 (semester 1 and semester 2), it equals 481.25 instructional hours per semester. If you have 8 class periods, that equals 60 instructional hours per .5 credit course. If you have a 7 period day, you are up to 68.75 instructional hours. If you have a 6 period day you are now at 80 instructional hours per .5 credit course. Therefore, most high school students are receiving .5 credits for 60-80 hours of instructional time. Some may argue that college courses require more time. I would argue that this may be the case for some 100-200 level college courses and not for others. Just as some high school courses require more time (higher level math and science classes). Like many high schools, we also have several college courses taught in our high school, by our staff (BHSU College Algebra, BHSU Government and BHSU Calculus 1, WDT Composition 1 and Fundamentals of Speech), and by college staff (WDT General Psychology, WDT Introduction to Sociology, WDT Introduction to Criminal Justice). All courses except for Calculus 1 (4 college credits/1high school credit) are taught in what is equivalent to a .5 credit high school course schedule. Just a reminder, the WDT general education courses taught at our school are all transferable to any of the SD Regents Universities. I urge you to communicate with the high school staff who teach college level courses and the colleges and universities that have staff teaching in at the high school in a high school schedule, to see what they would recommend. They would be the experts in how much credit a student should earn on their high school transcript for college courses taken. If students can earn a full credit for 45 hours of seat time, they will have less exposure to other elective courses if they receive inflated credit for college courses. This will reduce the opportunity for high school students to take college courses in place of high school required courses. Example: Composition I can count towards the composition portion of English 11 or the writing portion of English 12 (.5 credit each). However, Composition I does not cover the literature portion of either English 11 or English 12 high school requirements, therefore students will only be able to count .5 of the composition credit towards a high school required course. Questions to consider: Will you also address the autonomy of individual high schools to weigh some courses higher than others (5 point scale instead of 4)? This also affects students' GPA and class rank. Will you also address the autonomy of individual high schools to set their own grading scale? This also affects students' GPA and class rank. -- Dadra Avery</p>						
05/02/2023	Aslesen	TA			Howard	Opponent
<p>It should be recognized that high schools vary in the number of credits required for graduation as well as varying scenarios for earning credit, i.e. block vs. traditional scheduling. Schools have each adopted their own process to balance these individual characteristics as well as issues such as GPA calculation (i.e. GPA becoming dominated by dual credit courses). The way high schools transcribe these credits has no affect on how post-secondary schools accept these credits. I find that this proposal to create a uniform method is unnecessary and unneeded. We have never had a senior not receive dual credits earned upon application to a post-secondary institution. If the issue is student movement between schools during high school years, schools have addressed those adjustments as needed per, again, local graduation policies and procedures to do what is right for each individual student. Local control should dictate this process or I am afraid there will be bigger problems created.</p>						

05/02/2023	Swigart	Nicole	Educator		Black Hawk	Opponent
<p>I agree that credit should be the same across the state. However, I don't believe it should be more than .5 credit per semester. College students get 3 credits per semester class, but they need over 100 credits to graduate. High School students in RCAS need 22 credits to graduate. College classes actually meet for fewer hours than high school classes meet. For example, a student can take .5 psychology at SHS or dual enroll on-line through WDT for a semester. How fair would it be if schools would give the student who actually has less time in the classroom (three days per week for dual enrollment on-campus classes) more credit? Discussion on how the credit would be awarded is needed.</p>						
05/02/2023	Adrian	Sydney	Educator		Sioux Falls	Opponent
<p>Hello- I am writing in regard to 24:43:11:17 Transcription of postsecondary credits on a high school transcript. I am a high school counselor and my opinions come from what I see through my work with students. I do not believe the state should set a rule that a 3 credit class is the equivalent of 1.0 HS credit for a couple of reasons. Doing so will push more students towards dual credits and deter them from taking classes at their high school. Right now, we award students .5 credit for a 1 semester dual credit course. I see an issue with the proposed change for numerous reasons: 1) More students that are not ready for college classes (especially classes that are online!) will sign up because they will be able to "get out of" a year of a high school class by taking a semester long dual credit class. For example, they would take a semester long dual credit US History course rather than the yearlong US History course that our high school offers. 25% of my students that signed up for a dual credit class this fall either dropped it in the 1st two weeks, withdrew because they were getting a bad grade, or failed the course. 2) It will be easier for students to graduate high school early... We are "fast-tracking" high school students and forgetting that high school is meant to prepare for college or life after high school. 3) What about classes that are 4 or 5 college credits? 4) Students will sign up for college courses they don't need or won't count towards their future degree! They only see the short term "pay for a dual credit so I don't have to take a yearlong high school class" and not that they are paying for a class that won't even benefit them in the future. 5) Again, it will encourage more students to sign up when they are not ready. Bad grades (which I have seen happen!) in dual credit classes completely destroy a student's academic eligibility for college sports or scholarships and can even harm their chances of acceptance into professional programs. 6) Students who do poorly in a dual credit class may struggle to graduate high school on time. For example, I had a senior student failing their dual credit Western Civilization class this spring. He was counting on that for his final .5 credits of social studies in order to graduate high school. He had to withdraw from the dual credit class and is now trying to cram in an online .5 credit Social Studies course before graduation. If a student withdrew from a class where they needed that 1.0 credit in order to graduate high school, it would be incredibly hard for them to make up those credits. My view is that dual credit is an introduction to college- not to replace high school education. We want to encourage the right students to take dual credit classes. As a school, we do .5 credit for each college class because we want motivated and well-prepared students taking these classes- not students that are trying to "get out of a class" or "take the easy road". As adults, we can see that a college class is not the easy route, but students don't. They sign up for something they are not ready for. Thank you for your time, Sydney Adrian</p>						

05/02/2023	Mork	Gary	Educator		Brookings	Opponent
<p>I am not in favor of ANY of the changes proposed. English 101 counting as a full credit will allow a high school senior to bypass the research paper that all SD high schools mandate. There is no writing component to English 101. Allowing sophomores to take college credit?? Most juniors are not ready for true college classes let alone sophomores. Are we asking the college professors to dumb down their content? Ask ANY college professor that has to teach dual credit classes (I am married to 1) and they will tell you that at least 1/2 of the dual credit students are not prepared nor do as well as their regular ed true college aged student. And then the dual credit student starts their college transcript with poor grades. Parents are continuously asking the high schools about their child's dual credit class to which we tell them that we have no access to their grades nor content AND the colleges do not answer to the parents. And I am speaking of Brookings High School students, where we have lots of high flyers, lots of National Merit finalists and semi finalists. Where we have multiple ACT scores of 36 each and every year, and live in and have access to many people connected to SDSU. There MUST be local control- there are lots of inconsistencies between every S.D. high schools including different grading scales, additional graduation demands and attendance policies. Do Not dumb down education any more than it is.</p>						
05/02/2023	McMeekin-Hemmingstad	Christine	Educator		Elk Point	Opponent
<p>Hi, I do not agree with making schools give 1 high school credit for a semester long class, and I do not think schools should have to grant graduation credit for dual credit classes. I believe this should be up to each school district. Local districts should be able to have control over the quality of the education they provide. I had several seniors take an ENGL 101 course through USD. The professor didn't correct anything, all semester. Then at the end of the semester everyone ended up with an A. While I know this can and does happen, these students would be done with English with these new policies. Schools should have control over what students can take and what they learn. In addition, this makes has a large impact on high schools and high school teachers. With fewer students in classes, fewer teachers will be needed. This doesn't even touch on the fact that there is less human contact and connection. Given the poor mental health of students, more online and less human connection is not the answer. Christine</p>						