

**ARSD 24:43:11:17 Transcription of Postsecondary Credits on the High School Transcript
Public Comment as of July 6, 2023**

Below follows the public comments received. There are two opposed with no proponent comments received. One comment was received after the July 5 deadline, which relates to the revised rule package.

Date Submitted	Last Name	First Name	Role	Affiliation	Town	Proponent or Opponent
06/27/2023	Hay	JoLinda			Lemmon	Opponent
<p>Good Afternoon,</p> <p>I would like to ask that dual credit courses taken by High School students be given a value of .5 credit. This would make the dual credit classes equal, in credit, to a class taught by their high school for the same length of time. I do realize that SOME of the dual credit courses have a more rigorous syllabus than SOME high school courses-but that is a choice that each student makes when they decide to enroll in dual credit class(es).</p> <p>My concern is not the workload, it is the economic disadvantage that some students face. I believe that granting 1 credit per dual credit would DISCRIMINATE against students who are in a lower economic class.</p> <p>EX: A student whose parents can afford to pay for the reduced tuition dual credit class not only put their student ahead in their college career but also may allow them to graduate early and/or take additional classes—if as a senior I have to take 1 credit of English and I take ENGL 101 which is worth 1 credit, I have completed my Senior English requirement. This allows me to take more classes and/or graduate early.</p> <p>However, if a student has parents who are economically challenged and cannot afford to pay for dual credit classes, he/she will have to take what is offered by their high school and will only be able to earn a .5 credit for all the classes he/she takes for the same length of time. There is no chance of taking the extra classes or graduating early.</p> <p>Some smaller schools do not have the option of offering electives during the hours that they have required classes. EX: If a student takes ENGL 101 during fall semester and their High School only has required classes during that hour, the student would have to take an additional dual credit class during the spring semester to fill their schedule—once again, this may cause a hardship on lower economic class families.</p> <p>I believe that if a dual credit class is one semester long and a high school is allowing their students to take this class instead of their offered class during a specific class period then it should be worth the same credit option as any other high school class being offered.</p>						

Date Submitted	Last Name	First Name	Role	Affiliation	Town	Proponent or Opponent
06/08/2023	Frey	Jon	Educator		Vermillion	Opponent
<p>There are a number of concerns with regard to ARSD 24:43 which should be considered. The issue of whether a high school offers one credit or one-half credit for a three credit college course should not be regulated separately from an individual school district's credit requirement for graduation. Currently, students must earn 22 credits to graduate Vermillion High School. Students will earn between 6 and 7 credits per year (3 to 3.5 per semester), depending upon utilization (or not) of study halls. As such, a student can earn up to 21 credits (six fully scheduled semesters) by the time the student completes his/her junior year. Given that students can begin taking dual credit courses as sophomores, it would not be unusual for a student to eclipse 22 earned credits by the end of junior year under the new proposal. College bound students face increasing pressure to earn collegiate credit while in high school while others in some districts are finishing high school with near associate degree status. The new proposal is likely to increase the number of students graduating Vermillion High School at the end of the junior year which while beneficial to some, is not necessarily beneficial to all or even most. Finally, we need to consider the impact on the non-college bound student. If we are hoping to retain seniors for at least half of the senior year of high school, we may have to consider increasing the number of credits required for graduation for all students. Unfortunately, this will likely have a seriously adverse impact on our non-college bound students some of whom struggle to reach the 22 credits required for graduation and a number of them do not achieve 22 credits and fail to graduate. Moving the "finish line" further away is likely to adversely affect our graduation rate. Consider the ratios. A semester-long class that fulfils a high school graduation requirement is worth one-half credit at Vermillion High School. This is 2.27% of the needed credits to reach 22 for graduation. A 3-credit university class is 2.5% of the needed credits to reach the typical bachelor's degree which will often require 120 credits (or so). In other words, taken in the proper context, a semester class at Vermillion High School will take a student nearly the same distance as a semester class in college will take the same student toward the ultimate goal of graduation from high school or college. However, when a semester dual credit class is required to be worth 1 full credit at high school, it skews the ratio dramatically as that single course - taking no more time than the high school course - is now the equivalent of 4.5% of the credits necessary to graduate high school. How a high school chooses to value a dual credit course vs how a university values the course should remain two distinctly different matters as there are different factors to consider as I've attempted to illustrate here. Please realize that while a "one-size fits all" approach looks neat and clean on paper, it is not, in reality clean at all. It will create significant ripple effects and I fear, unnecessary hardship for a number of students. ARSD 24:43 is a poor example of a state government entity supporting a local governmental entity. "Local control" should be more than a convenient buzz word or phrase. If it is to be valued, it should always be valued. This policy is over-reach, pure and simple. It takes the decision away from those who work closest with the issue -- local school boards and educators. Thank you for your consideration of this matter as a serious affront to local control. Jon Frey, Principal Vermillion High School</p>						

Received Late:

Date Submitted	Last Name	First Name	Role	Affiliation	Town	Proponent or Opponent
07/06/2023	Anderson	Rachel	Parent and School District Employee		Watertown	Opponent
<p>Board members,</p> <p>I am writing today with deep concerns over the new proposed rule for transcription of dual credit courses for high school students. I am writing as a parent of high school senior this fall and as an employee of my local school district.</p> <p>Our school uses a block schedule where students attend 4 class periods per day giving them the opportunity to earn 3-4 credits per semester. A class that lasts for a 9-week period is worth .5 credits and a class that lasts for a semester is worth 1 credit. This most closely aligns with the way post-secondary schools run their semesters. Schools who run on a period schedule also allow for their students to earn 6-8 credits per year.</p> <p>My son, who will be a senior this fall, has worked very hard to complete most of his high school requirements early so that he can have the benefit of taking the dual credit courses at reduced tuition rates this upcoming year to help propel him into his post-secondary studies. With the current policy, each dual credit course that he is taking lasts for one semester and gives him the same credit as one semester of his high school courses. He is required to complete 6 high school credits each year which equates to 3 per semester with block scheduling. With the proposed change of a 3 credit post-secondary course only equating to a .5 high school credit he would be required to take 6 dual credit courses per semester just to maintain the minimum amount of high school credits required. The majority of college students are taking 4 or 5 three credit courses per semester, but with this rule we will be asking to our high school students to go beyond what a full-time college student is taking.</p> <p>The current rules only allow a high school senior to take up to 11 credit hours of dual credit classes per semester without applying for an exception. This wouldn't even allow our students to meet the minimum requirements for high school graduation.</p> <p>I understand the purpose of having all classes transcribed uniformly state-wide, but I strongly request that the board consider alternative options before implementing this policy. Post-secondary courses typically offer more rigorous content than a typical high school course and should not be transcribed at levels below what high school courses are. This rule will require our high school students to perform at levels above what colleges are asking their students to do. This new rule would require our high school students to take twice as many college level courses to earn the same amount credit of as they would taking only high school level courses. The content taught in a semester of a college level course is equal to or greater than the content taught in a yearlong course at the high school level on a period schedule. The previous rule of 1 full credit per 3 credit dual credit course is much more reflective of the time and work that the students must put into dual credit courses at the post-secondary level. I urge you to please investigate all aspects of this rule change before coming to a decision.</p> <p>Thank you for your time and consideration, Rachel Anderson Watertown</p>						

