

OFFICE OF INTERNAL AUDITING

Minnesota State Colleges and Universities

FINAL REPORT

**Post-Secondary Enrollment
Options Program**

Public Release Date: July 17, 2001

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Post-Secondary Enrollment Options Program

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OFFICE OF INTERNAL AUDITING



Minnesota State Colleges & Universities

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Post-secondary Enrollment Options programs allow MnSCU colleges and universities to offer college credits to high school students. In July 2000, the MnSCU Audit Committee authorized us to conduct a system-wide study of these programs (See Appendix I). The extent that college-level opportunities have become available to high school students in Minnesota is absolutely amazing, particularly considering that the PSEO program was only created in 1985. We estimate that during the 1999-2000 school year about 20% of Minnesota high school seniors earned some college credits before graduating from high school. MnSCU colleges and universities are the primary source of these courses, accounting for an estimated 62% of credits that high school students could later transfer toward a college degree. Although these program statistics are impressive, this report shows that there is room for improvement and also possible expansion. We also found that there are important financial implications to the program that need attention.

We conducted this study in compliance with the *Institute of Internal Auditors: Standards for Professional Practice of Internal Auditing*. We interviewed nearly 200 MnSCU employees, including PSEO coordinators, chief academic officers, chief finance officers, registrars, and admissions directors. We are grateful to these employees for their assistance. We also analyzed extensive student, financial and programmatic data.

Ms. Kimberly McLaughlin was responsible for much of the lead work on this project, including the design of interview questionnaires. Other Internal Auditing employees, as identified on page iii, also contributed significantly to this project. Finally, I would like to acknowledge the expert program assistance that we received from the Advisory Task Force and the MnSCU Academic Affairs Division (See page iv).

Sincerely,

/s/ John Asmussen

John Asmussen, CPA, CIA, CISA

Executive Director
Office of Internal Auditing

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Study Team

The following representatives of the MnSCU Office of Internal Auditing contributed to the completion of this project:

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Office Manager:	Nancy Hogle
Student Worker:	Penny Wichmann

MnSCU Review of Report Drafts

The office recognizes the expert advice and guidance provided by the advisory task force whom were sent copies of the interview questionnaire, preliminary conclusions and the draft report for review. The following persons served on the task force:

Doug Allen	Vice President of Educational Services – Anoka Ramsey Community College
John Burgeson	Dean, Continuing Studies – St. Cloud State University
Monir Johnson	Director of Admissions - Minneapolis Community and Technical College
Jim Kehoe	Counselor - Rochester Community and Technical College
Kevin Lindstrom	Counselor – Anoka Hennepin Technical College
Bette Midgarden	Vice President for Academic Affairs – Minnesota State University Moorhead
Georgia Suoja	Mesabi Range Community and Technical College
Pamela Tranby	Vice President for Academic Affairs – Riverland Community and Technical College

Draft reports of the Post-Secondary Enrollment Option program or some specific sections of these draft reports were submitted for review and discussed with the following members of the system office, colleges and universities and the Minnesota Department of Children, Families and Learning.

A complete copy of the draft report was submitted for review to:

Dr. Linda Baer	Senior Vice Chancellor – Academic and Student Affairs
Leslie Mercer	Associate Vice Chancellor, Research and Planning
Linda Kohl	Associate Vice Chancellor, Public Affairs
Cyndy Crist	System Director of Academic Affairs

Sections of the draft report and a summary digest were submitted for review to:

Laura King	Vice Chancellor – Chief Financial Officer
Bill Tschida	Vice Chancellor – Human Resources
Gail Olson	General Counsel

MnSCU Review of Reports Continued:

Sections of the draft report were submitted for review to:

Ken Niemi	Associate Vice Chancellor, Information Systems - Chief Information Officer
Kristine Kaplan	Assistant General Counsel
Mary Messimer	Program Manager – Tech Prep and Student-to-Work
Mark Sinclair	Enrollment Options Specialist – Department of Children, Families & Learning
Carol Hokenson	Supervisor, Program Finance – Department of Children, Families & Learning
Steve Etheridge	Education Finance Specialist – Department of Children, Families & Learning

A summary digest of the draft report was submitted for review to:

Dr. James H. McCormick	Chancellor
Dr. Wilson Bradshaw	President – Metro State University
Dr. Tom Horak	President – Normandale Community College
Dr. Kathleen Nelson	President – Lake Superior College
Dr. Roy Saigo	President – St. Cloud State University
Dr. Ron Thomas	President – Dakota County Technical College
Dr. Manuel Lopez	Associate Vice Chancellor, Continuous Improvement
Dr. Penny Harris-Reynen	Board of Trustees Executive Secretary

Based on comments from reviewers, the draft was modified to improve its clarity and accuracy. The final conclusions and recommendations represent the professional judgement of the MnSCU Office of Internal Auditing. Beginning on page vi, is a letter from Senior Vice Chancellor Baer documenting her comments regarding the Post-Secondary Enrollment Options program study.



Minnesota State Colleges & Universities

MEMORANDUM

TO: *Trustees -*
Will D. Antell, Andrew Boss, Nancy Brataas, Mary Choate, Daniel G. Coborn,
Dennis Dotson, Ivan F. Dusek, Robert Erickson, Bob Hoffman, Jim A. Luoma,
Lew Moran, Michael Redlinger, Joann Splonskowski, Joseph Swanson,
Michael M. Vekich, chair

FROM: Linda Baer, Senior Vice Chancellor for Academic and Student Affairs

DATE: July 10, 2001

SUBJECT: PSEO Internal Audit

I appreciate the opportunity to comment on the internal audit of the Post-Secondary Enrollment Option, PSEO, program. I have been very involved in the program while on a campus. I was very supportive of a PSEO workshop that was hosted by the colleges and universities in the northwest area of the state in October 1999. This workshop served as a forum to discuss the issues and concerns that had resulted from campus interpretation of policies.

In February, I requested that the Office of Internal Auditing review the Post-Secondary Enrollment Options programs within MnSCU. They reviewed the historical context, made comparisons with other states, and explored the overall program impact.

There are several important findings in this report. First, it is clear that MnSCU is the predominant provider of college credits to Minnesota high school juniors and seniors. It is important to note that the MnSCU campuses have provided choice and access to thousands of high school students.

Second, the program is strongly supported by post secondary school administrators. The Office of Internal Auditing surveyed post secondary school administrators' opinions concerning the PSEO programs. This survey was compared with a survey conducted by the Office of the Legislative Auditor in 1995. Administrators were far more approving of the program in 2000 with 98% reporting that the program has generally promoted rigorous academic pursuits and 100% indicating that students generally have gained from their participation. Ninety-eight percent of those interviewed indicated that the program is generally performing in a satisfactory manner.

Despite these successes, key issues need to be addressed. It is apparent that policies have not been uniformly accepted, interpreted, nor implemented. Academic Affairs will work with campuses to develop a more consistent methodology for developing, interpreting, implementing and enforcing the PSEO educational policies.

More attention will be given to monitoring the rigor of the programs particularly in the College in the High School programs. Actions to address improvements in student data, program information, secondary school relationships, and feedback from program participants will be developed. Academic Affairs will explore the recommendations for expansion of the program while maintaining quality and adherence to Board policies.

One of the most important areas related to PSEO is in the area of finances. The PSEO program is supported by the legislature as an important program providing choice and opportunity to high school students. However, the current financing methods are not adequate. Serious consideration of the financial impact of the program is important. In addition, the system office must determine the best approach for realigning legislative funding with the real cost of providing the educational services.

This report provides a starting point for review of MnSCU participation in the Post-Secondary Enrollment Option. We look forward to working closely with the Department of Children Families and Learning in addressing many of the issues. Several actions to consider with them include: more attention to involving a full range of students in PSEO, including students in alternative learning centers, homeschooled students, students involved or interested in technical programs, and low income students. We need to work together to ensure that parents get good information about PSEO learning opportunities. In addition, we will work with CFL and secondary school administrators to address possible barriers to student participation and assess their opinions about the program and how it could be improved.

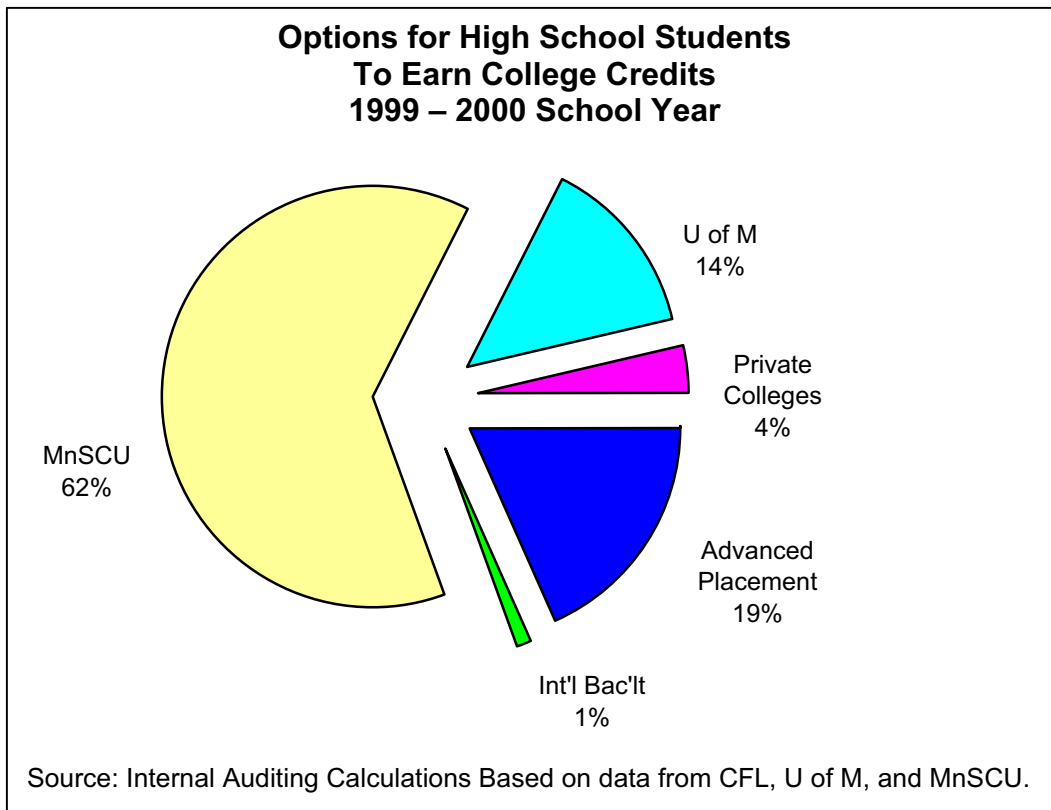
I will keep you informed of our progress as we address the audit report's recommendation. I appreciate the efforts of the Office of Internal Auditing and thank the campus presidents and staff for their efforts in gathering information for this report.

MnSCU Office of Internal Auditing Post-Secondary Enrollment Options Study

Executive Summary

Before today's high school juniors and seniors entered Kindergarten, former Governor Rudy Perpich championed a student choice program known as Post-Secondary Enrollment Options (PSEO). It effectively empowered high school students and their parents to decide whether the student should get an early jump on earning college credits, irrespective of the preferences of secondary school administrators. Secondary school administrators have attempted to retain their best students by creating other options that allow high school students to earn college credits without leaving their local high school. We estimate that today approximately 20% of Minnesota high school seniors earn college credits before graduating from high school.

MnSCU is the dominant provider of college credits to Minnesota high school juniors and seniors. High school students from nearly every public high school in the state accessed MnSCU campuses to earn college credits. MnSCU colleges and universities have further expanded the reach of the program by offering college courses in 163 Minnesota high schools.



Executive Summary

The MnSCU Board of Trustees has educational policies that govern the PSEO program. Policy 3.5 establishes an admissions threshold for high school juniors and seniors and creates some quality assurance standards for College in the High School programs. Policy 3.3 requires assessing the college readiness of incoming students (including PSEO students). These policies have not been uniformly accepted, interpreted, or implemented. In particular two state universities have not complied with a clear directive contained in Policy 3.5. This experience suggests that the methodology for developing, interpreting, implementing and enforcing PSEO educational policies needs to be reconsidered.

The rapid growth of PSEO programs at MnSCU colleges and universities has created new challenges to preserving the quality of academic programs and ensuring the academic achievement of high school students. The academic performance of most high school students attending college and university campuses has been impressive; although a significant number of high school students fail or withdraw from courses taken at college and university campuses. Also, several College in the High School programs should reevaluate their quality assurance features, particularly standards for assessing student performance. There are additional improvement opportunities with student data, program information, secondary school relationships, and obtaining feedback from program participants.

Despite its very impressive reach across the State of Minnesota, there are additional opportunities to expand the availability of earning college credits to high school students. In particular, the program has had difficulty extending college-level technical education opportunities to high school students. Further expansion opportunities include reaching out to students who cannot succeed in the high school environment. Colleges and universities also could consider expanding programs through the use of technology. Caution is needed, however, to ensure that program quality is preserved for any expansion efforts.

In fiscal year 2000, the State of Minnesota and local school districts invested about \$27 million in supporting high school students who earn college credits at MnSCU colleges and universities. We estimate that this investment returned savings of over \$45 million to Minnesota taxpayers, parents, students, and the federal government. The State of Minnesota alone is saving about \$7 million on these students. Despite these state-level savings, MnSCU is required to absorb an estimated loss of about \$6.3 million for sponsoring PSEO programs. MnSCU shields individual colleges and universities from recognizing this loss, however, the current MnSCU allocation model rewards individual colleges and universities for participation in PSEO.

CHAPTER 1

Introduction: College Credits before High School Graduation

Before today's high school juniors and seniors entered kindergarten, former Governor Rudy Perpich championed a student choice program known as Post-Secondary Enrollment Options (PSEO). It effectively empowered high school students and their parents to decide whether the student should get an early jump on earning college credits, regardless of the preferences of secondary school administrators. Secondary school administrators have attempted to retain their best students by creating other options that allow high school students to earn college credits without leaving their local high school. We estimate that today approximately 20% of Minnesota high school seniors earn college credits before graduating from high school.

In July 2000, the MnSCU Audit Committee approved the Office of Internal Auditing to conduct a system-wide study of the Post-Secondary Enrollment Options (PSEO) program. The study was originally requested by the Senior Vice Chancellor for Academic and Student Affairs. In October 1999, MnSCU convened a statewide conference on the PSEO program in Moorhead, Minnesota. Representatives from most MnSCU colleges and universities, along with representatives from the University of Minnesota, the Minnesota Department of Children, Families, and Learning (CFL), secondary school administrators and teachers, parents, students, and one legislator attended the conference. It revealed that the PSEO program had grown considerably, and several differences were emerging in how the program was administered. The conference also left many unanswered questions. As a result, the Senior Vice Chancellor asked Internal Auditing to conduct a comprehensive study of the program to serve as a basis for possible program improvements.

Study Approach and Methodology

The study objectives approved by the Audit Committee are shown in Appendix I. Internal Auditing used a combination of interviews and data analysis techniques to conduct this study. A standard interview guide was used to interview PSEO administrators and other personnel at all MnSCU colleges and universities and gather relevant information on the PSEO program. Internal Auditing also extracted student data from the MnSCU Integrated Statewide Records System (ISRS). A substantial effort was required to get the data into a standard format, due to significant variations in data coding practices. Data validation procedures included testing the accuracy of data recorded by each MnSCU college and university. Corrected data was compiled into a database and used for analysis.

Additional information for the study was obtained from CFL and the University of Minnesota.

The MnSCU Academic Affairs Division named an advisory task force to provide Internal Auditing with expert advice throughout the study. The Minnesota Community College Faculty Association also nominated two representatives to serve on the task force. Task force membership is shown on page iv. The task force reviewed preliminary versions of the interview questions, preliminary study conclusions, and the final report draft.

Internal Auditing also presented preliminary study results at meetings of MnSCU Chief Academic and Student Officers (June 1, 2001) and Chief Finance and Facilities Officers (June 28, 2001). The final draft report also was distributed to five MnSCU presidents (leadership of the Council of Presidents and liaisons to the Audit Committee) for review.

PSEO Program History & Background

In 1985 the Minnesota State Legislature enacted the PSEO program as part of Governor Rudy Perpich's 1985 Access to Excellence package of school reforms. It was one of the first in a series of student choice reforms that the Legislature enacted beginning in the mid-1980's. The purpose of the PSEO Act is "to promote rigorous academic pursuits and to provide a wider variety of options to high school pupils by encouraging and enabling secondary pupils to enroll full time or part time in nonsectarian courses or programs in eligible post-secondary institutions."¹

Exhibit 1-1 shows the key features of the PSEO legislation. The Legislature has made numerous changes to the PSEO program since enactment in 1985. Three of the most significant changes include:

- ✓ The 1986 Legislature added student and parent notification provisions.
- ✓ The 1991 Legislature changed how the program was financed and the changes generally resulted in school districts and post-secondary schools receiving less money for participating students.
- ✓ The 1992 Legislature amended the PSEO program to permit school districts to enter into contracts with post-secondary schools directly, rather than using a payment system set up through the Minnesota Department of Children, Families and Learning.

In Minnesota today, any 11th or 12th grade pupil enrolled in a school (including public, private, home, and charter schools) or an American Indian-controlled tribal contract or grant school eligible for aid under Minnesota Statute section 124D.83, except for a foreign exchange program, may be eligible to apply to a participating post-secondary institution.

¹ Minnesota Statutes 124D.09.

Exhibit 1-1: Key Features of PSEO Legislation

Minnesota Statute	Key Feature
124D.09 Subd. 07	By March 1 of each year, school districts must provide information about the PSEO program to all 10 th and 11 th grade students.
124D.09 Subd. 08	Sets limits on participation by high school students. For example, a high school student who enrolls in the PSEO program in grade 11 may not enroll in post-secondary courses for more than the equivalent of two academic years. In addition, students who have graduated from high school cannot participate in the PSEO program. However, a student who has completed course requirements for graduation but who has not received a diploma may participate in the program.
124D.09 Subd. 09 and 135A.101 Subd. 1	Post-secondary institutions may provide information about its programs to secondary schools, high school students and parents. However, institutions may not advertise or otherwise recruit participation based on financial grounds.
124D.09 Subd. 10	Post-secondary institutions may enter into agreements with school districts to provide post-secondary courses in high schools or other locations. High school teachers or post-secondary faculty may teach these courses.
124D.09 Subd. 12	If a pupil enrolls in a post-secondary institution after leaving secondary school, the post-secondary institution must award post-secondary credit for any courses successfully completed for secondary credit at that institution. Other post-secondary institutions may award, after a pupil leaves secondary school, post-secondary credit for any courses successfully completed under the PSEO legislation.
124D.09 Subd. 13	Requires CFL to make payments, based on a formula, to post-secondary institutions for courses taken for secondary credit at post-secondary institutions.
124D.09 Subd. 14	A pupil enrolled in a PSEO course for secondary credit is not eligible for any state student financial aid under chapter 136A.
124D.09 Subd. 16	Agreements between post-secondary institutions and school districts, for courses taught at high schools by high school teachers, shall not require a payment from the school district that exceeds the cost to the post-secondary institution that is directly attributable to providing that course.
124D.09 Subd. 19	In general, post-secondary institutions that receive payment under subdivision 13 cannot charge high school students for fees, books, or other necessary costs associated with the post-secondary course.
124D.09 Subd. 21	Post-secondary institutions must inform students of support services available at its institution.
124D.09 Subd. 23	A secondary student who is part of an intermediate school district may not enroll in that intermediate district's vocational program as a post-secondary student under PSEO when the intermediate district operates a secondary program at the college facility and secondary students have access to the post-secondary curriculum and receive high school and college credit for successfully completing the program.
135A.101 Subd. 02	Post-secondary institutions shall not enroll high school students, for PSEO, in developmental courses or other courses that are not college level.

Source: Prepared by MnSCU Internal Auditing based on information extracted from Minnesota Statutes.

As defined in Minnesota law, by March 1 of each year, a school district must provide general information about the program to all pupils in grades 10 and 11. However, the decision to participate in the PSEO program rests with students, parents, and post-secondary schools—not with school districts. Post-secondary institutions may provide information about their programs to secondary schools for distribution to students. Post-secondary institutions may not, however, advertise or recruit students to participate in the program on financial grounds.

Two basic types of financial arrangements exist for colleges and universities to recoup student tuition, fees and other costs from PSEO courses. Under the traditional arrangement, CFL withholds state aids from school districts redirects part of it to post-secondary educational institutions. School districts lose 88% of their state aid for every full year equivalent student participating in the traditional PSEO program. CFL then pays colleges or universities a set amount per credit hour for participating students. In fiscal year 2000, CFL paid colleges and universities \$142.62 for each semester credit hour of PSEO courses. According to CFL, 7,136 Minnesota high school students (measured on a head count basis) participated in PSEO programs financed through the state in fiscal year 2000.

The second financial arrangement allows school districts to contract directly with colleges and universities for PSEO courses. In some cases, the contracts simply provide an alternative funding method to the traditional CFL formula. For some school districts, there is a financial advantage to retain their full share of state aid and negotiate a direct payment for any high school students attending a college or university. The more prominent form of PSEO contracts, though, stipulates that a high school teacher delivers instruction for PSEO courses at the high school, while being mentored by a college or university faculty member. These arrangements are referred to by various names, such as concurrent enrollment, the Challenge Program, Vision 2000, and Senior to Sophomore program. For purposes of this report, we refer to this type of program as “College in the High School”. CFL estimates that 9,500 high school students (measured on a head count basis) participated in contracted PSEO courses in fiscal year 2000.

Under both financial arrangements, MnSCU receives a 50% share of legislative funding for each PSEO Full Year Equivalent Student (FYE) generated. Historically, the MnSCU allocation formula has treated PSEO students the same as other college students for purposes of reallocating legislative funding to its colleges and universities. This method of reallocating funds currently is being reconsidered (See Chapter 6 for further information).

Also under both financial arrangements, colleges and universities face strict limits on the fees that can be charged to high school students. CFL or contract revenue is supposed to cover the students’ tuition, fees, and books. Colleges and universities must observe the state laws that govern secondary students, meaning that colleges and universities cannot charge most fees to PSEO students.

Other Options for Minnesota High School Students to Earn College Credits

We estimate that approximately 20%² of Minnesota high school seniors earned college credits before graduating in the 1999-2000 school year. This report focuses almost exclusively on opportunities for high school students to earn college credits through MnSCU colleges and universities. As shown in Chapter 2, MnSCU is the dominant provider of college credits to Minnesota high school students. Exhibit 1-2 shows the full range of programs through which high school students may earn college credits.

Exhibit 1-2: Options for High School Students to Earn College Credits

Program	Features
PSEO	
• Traditional	Financed by CFL, taught by college faculty on campus
• Contract On-Campus	Same as traditional, except financed by secondary school
• Contract Off-Campus	Financed by secondary school, taught in high school by college faculty (including on-line and ITV courses)
• College in High School	Financed by secondary school, taught in high school by high school teacher with college mentor
Advanced Placement (See Appendix II)	Offered in high schools through a nonprofit organization, College Board. No MnSCU oversight of curriculum or instruction.
International Baccalaureate (See Appendix II)	Offered in high schools through a nonprofit educational foundation, the International Baccalaureate Organization (IBO). No MnSCU oversight of curriculum or instruction.
Tech Prep	High school and college agree on curriculum through an articulation agreement. Taught by high school teacher. Credits typically not transcribed unless student later enrolls in sponsoring college.
Intermediate School Districts	State law prohibits students in these 3 metro area districts from taking technical education courses through PSEO. Course offerings are negotiated through joint powers agreements.
Self-Arranged	Students pay tuition, typically for summer school or development courses not eligible for PSEO.

Source: Compiled by Internal Auditing from various sources.

Similar Programs in Other States

According to the Education Commission of the States, 17 states offer comprehensive post-secondary enrollment options for high school students. To our knowledge, Minnesota was the first state to enact legislation for these programs. Our analysis of the laws and policies of other states revealed that the Minnesota program provided more

² According to our estimates, CFL financed slightly less than half these credits through the traditional PSEO financing formula. Contracted PSEO programs (predominantly College in the High School programs) and Advanced Placement examinations generated most of the other credits.

control to students than most other states. The Minnesota program also provided the most generous financial support to students and parents. For example, many other states required PSEO students to purchase their own books. Minnesota law prohibits charging PSEO students for required books. Books are either purchased through monies provided from CFL or by high schools that contract with colleges and universities. Exhibit 1-3 shows other states that have similar programs.

Exhibit 1-3: States Offering Post-Secondary Enrollment to High School Students

States with Comprehensive Programs (1)

- Alaska
- Colorado
- Florida
- Georgia
- Idaho
- Maine
- Massachusetts
- Michigan
- Minnesota
- Missouri
- New Jersey
- Ohio
- Oregon
- Utah
- Washington
- Wisconsin
- Wyoming

States with Limited Programs (2)

- Arizona
- Arkansas
- California
- Indiana
- Iowa
- Kansas
- Louisiana
- Mississippi
- Nevada
- North Dakota
- Oklahoma
- Puerto Rico
- South Dakota
- Tennessee

States with No Programs

- Alabama
- Connecticut
- Delaware
- District of Columbia
- Hawaii
- Illinois
- Kentucky
- Maryland
- Montana
- Nebraska
- New Hampshire
- New Mexico
- New York
- North Carolina
- Pennsylvania
- Rhode Island
- South Carolina
- Texas
- Vermont
- Virginia
- West Virginia

(1) "Comprehensive" post-secondary enrollment programs allow students to enroll in post-secondary courses at minimal or no cost, permit course credit to be applied at both the high school and post-secondary institutions and contain few restrictions on eligible courses for student enrollment.

(2) "Limited" post-secondary enrollment programs restrict which students can participate, require students to pay tuition costs of post-secondary classes, restrict where course credit may be applied and/or contain stringent criteria on eligible courses for student enrollment.

Source: Education Commission of the States, ECS StateNotes: School Choice State Actions, Most Recently Updated in February 2001

Previous Studies of PSEO

There have been two prior studies of the PSEO program. In March 1996, the Office of the Legislative Auditor (OLA) released a study of the Post-secondary Enrollment Options program. This OLA study focused on students who left their secondary school for at least part of a day to take one or more courses at a post-secondary school through the PSEO program during the 1994-95 school year. The OLA study did not examine College in the High School programs or other programs that might lead to post-secondary credits, such as Advanced Placement and International Baccalaureate.

The objectives of the OLA study were to determine the following:

- ✓ What types of students have participated in the Post-secondary Enrollment Options program and why? To what extent have participating students, parents and school administrators been satisfied with the program?
- ✓ What types of courses have students taken, and have they completed them satisfactorily?
- ✓ How have secondary and post-secondary schools implemented the program? Has access been a problem in any part of the state?
- ✓ How has the Post-secondary Enrollment Options program affected schools? What has been the fiscal impact of the program on students, school districts, post-secondary schools, and the state?

The OLA study provided much useful information about PSEO programs offered at colleges and universities. The OLA study cited the following conclusions regarding program satisfaction:

- **Most program participants, their parents, postsecondary school administrators, and directors of alternative secondary schools were satisfied with the Postsecondary Enrollment Options program, but most high school administrators were not.**

Seventy-three percent of participating students told us that they were “very satisfied” with their experience in the program and another 24 percent said they were “somewhat satisfied”. Ninety-five percent of participants’ parents said that they would “definitely” or “probably” encourage their children to participate again. Seventy-two percent of postsecondary administrators and 82 percent of alternative school directors, but only 42 percent of high school administrators, “agreed” or “strongly agreed” that the program was generally performing in a satisfactory manner.³

³ Postsecondary Enrollment Options Program, Program Evaluation Division, Office of the Legislative Auditor, State of Minnesota, March 1996, page 70.

The OLA study also had important conclusions about the need for improved program information, relationships with secondary schools, admissions standards, and financial impact. Several of these conclusions are cited later in this report when referring to similar conclusions found by Internal Auditing.

In February 1997, a doctoral candidate at the University of Minnesota completed a PSEO longitudinal study. The study abstract contains the following conclusions:

This study assessed the Minnesota Postsecondary Enrollment Options Program (PSEO) from the perspectives of past participants and their parents. Through PSEO, public school juniors and seniors can earn both high school and college credit by taking postsecondary courses. Students do not need the consent of high school authorities to participate in the program.

With the support and cooperation of the Minnesota Department of Children, Families, and Learning, 500⁴ randomly selected PSEO participants (who were high school seniors in 1994 and 1995) and their parents were mailed surveys in which they were asked to provide information on the student's participation in the program, current educational status, and highest expected educational attainment. In addition, they were asked to rate the impact and value of the program participation for the student. A total of 470 usable surveys were returned. An additional 49 non-respondents provided usable information through a telephone survey.

Reported data showed the mean number of quarter credit equivalents earned by students through PSEO varied by the type of institution they attended, but was 26.7 overall; about 92% of PSEO students enrolled in postsecondary institutions after high school; credits earned through PSEO were accepted into postsecondary diploma programs at a rate of 87%; it was anticipated that 96% of PSEO students would complete a college degree.

Former PSEO participants and parents generally rated as positive the program's impact on student's educational development, self-confidence, preparation for postsecondary matriculation, study habits, graduation from high school, overall high school experience, relationships with peers, and relationships with family members. Survey respondents most often rated as "uncertain" and "negative" the impact on student participation in high school activities. Over 97% of targeted students and parents rated the value of PSEO participation as "excellent" or "good", while less than 3% rated it as "fair" or "poor".

The benefits of participation most often reported were the eased transition from high school to college, and greater academic challenge than available at high

⁴ A total of 1,000 surveys were mailed; 500 to students and another 500 to their parents.

school. The concerns most often reported were the missed high school activities, and discriminatory treatment of PSEO students by high school personnel.⁵

Both studies found excellent support for PSEO programs from students and parents. Therefore, we presumed that student and parent support has remained strong for the program. We held two focus groups with current MnSCU students to discuss the PSEO program, but did not attempt to systematically reassess student and parent satisfaction.

Neither study analyzed the College in the High School programs. This Internal Auditing study has gathered significant data on the College in the High School programs offered through MnSCU and to a lesser extent, similar programs offered through the University of Minnesota.

⁵ A Follow-up on Students who Took Courses through the Minnesota Postsecondary Enrollment Options Program, Dr. Douglas Leo Mullin, February 1997.

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CHAPTER 2

PSEO at MnSCU: Program Impact & Statistics

MnSCU is the dominant provider of college credits to Minnesota high school juniors and seniors. High school students from nearly every public high school in the state accessed MnSCU campuses to earn college credits. MnSCU colleges and universities have further expanded the reach of the program by offering college courses in 163 Minnesota high schools.

Exhibits 2-1 through 2-3 shows how MnSCU dominates the market for high school students earning college credits in Minnesota. In particular, as shown in Exhibit 2-3, MnSCU provides 82% credits earned by high school students attending college campuses. During the 1999-2000 school year, over 12,000 Minnesota high school juniors and seniors earned college credits from a MnSCU college or university.

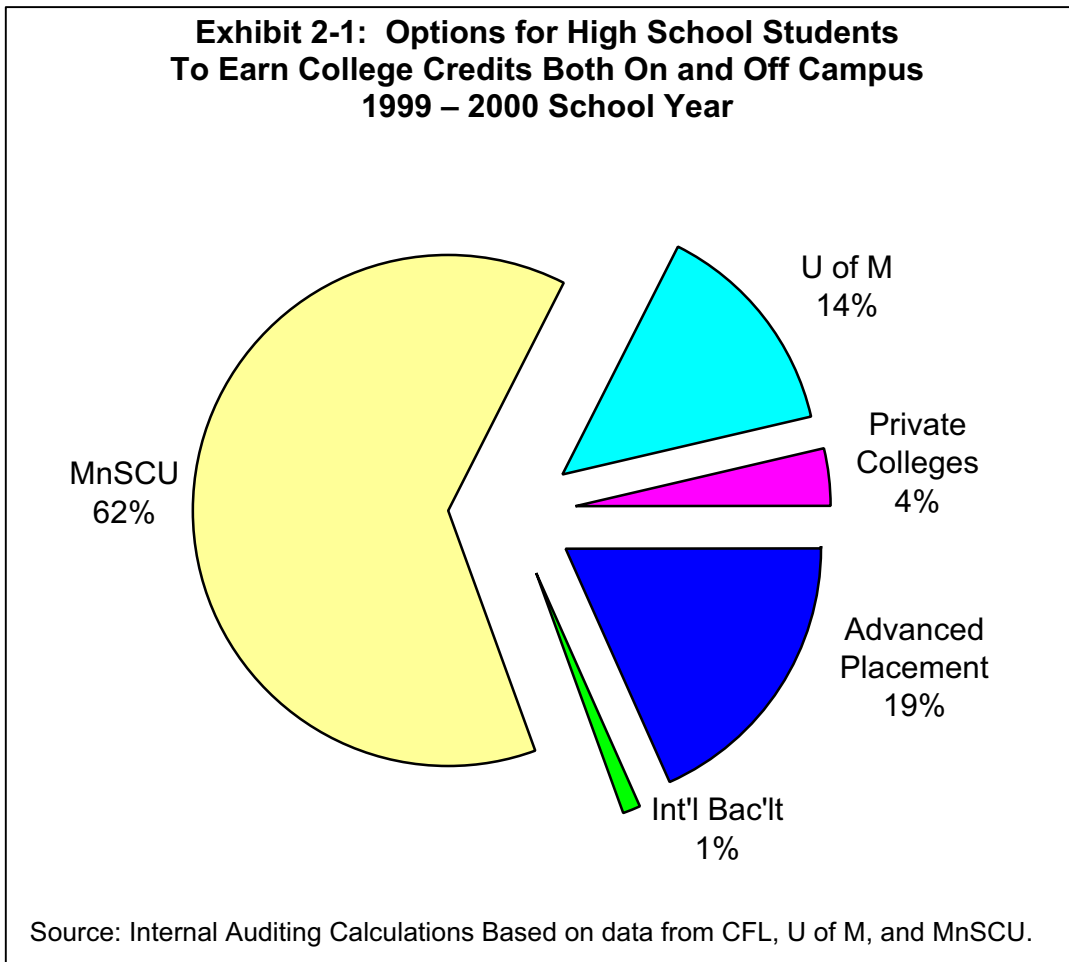
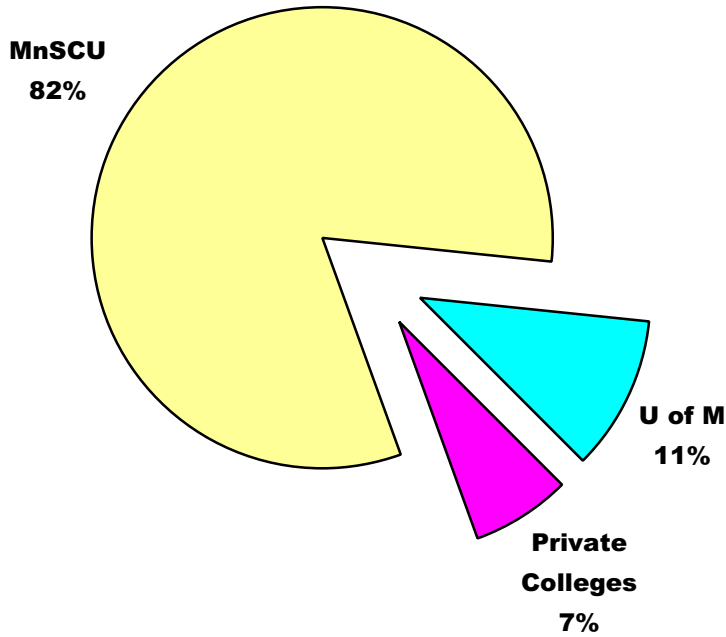
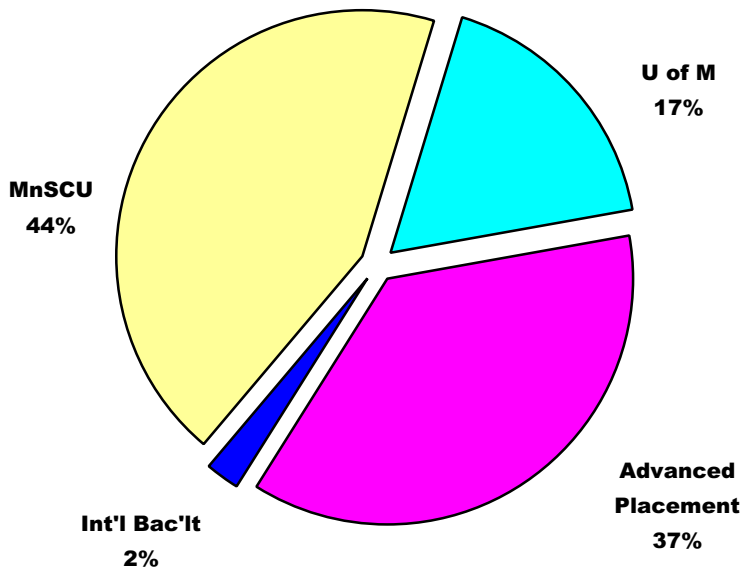


Exhibit 2-2: Options for High School Students To Earn College Credits on College Campuses 1999 – 2000 School Year



Source: Internal Auditing Calculations Based on data from CFL, U of M, and MnSCU.

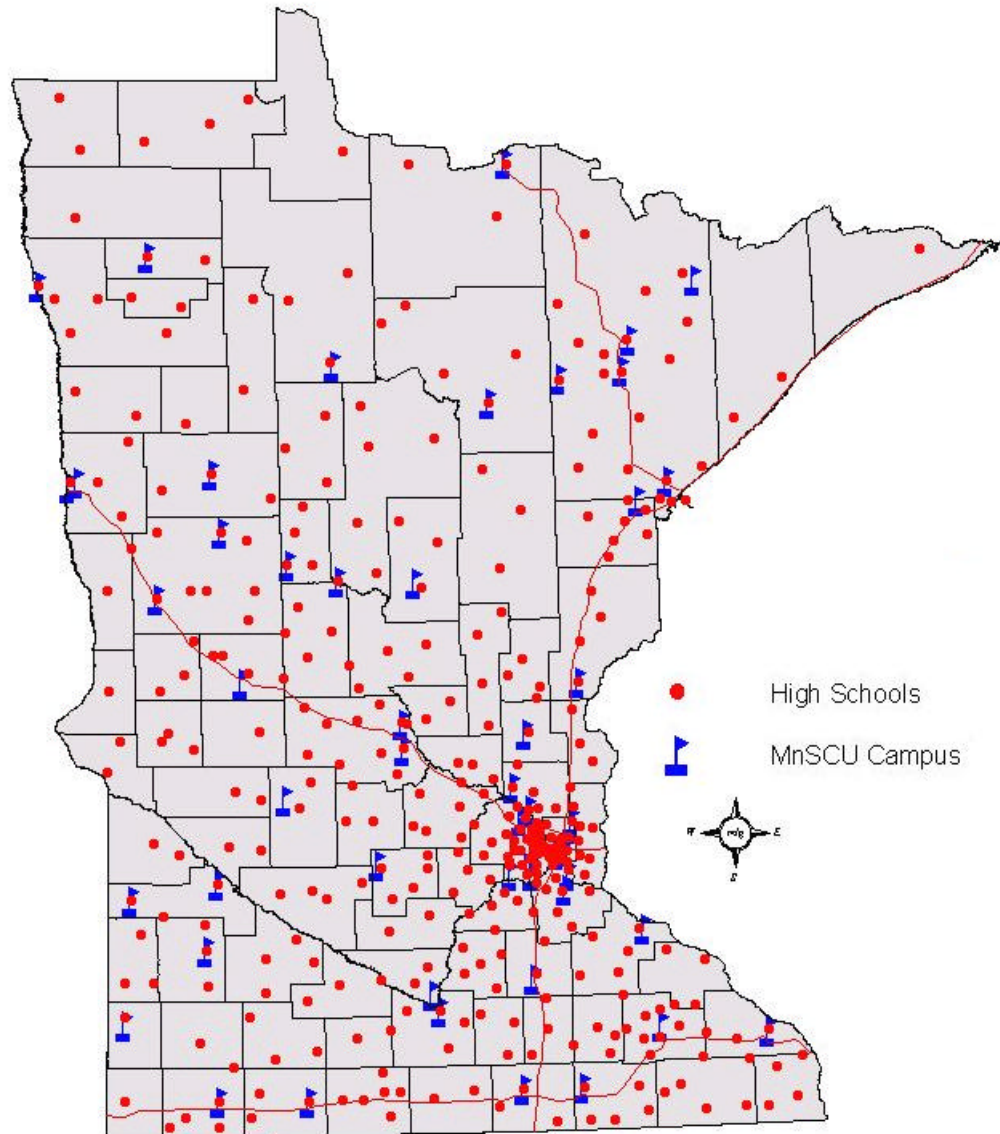
Exhibit 2-3: Options for High School Students To Earn College Credits in High Schools 1999 – 2000 School Year



Source: Internal Auditing Calculations Based on data from CFL, U of M, and MnSCU.

As shown in Exhibit 2-4, these high school students came from virtually every public high school in the state. Many private high school students and home school students also earned college credits from MnSCU colleges and universities.

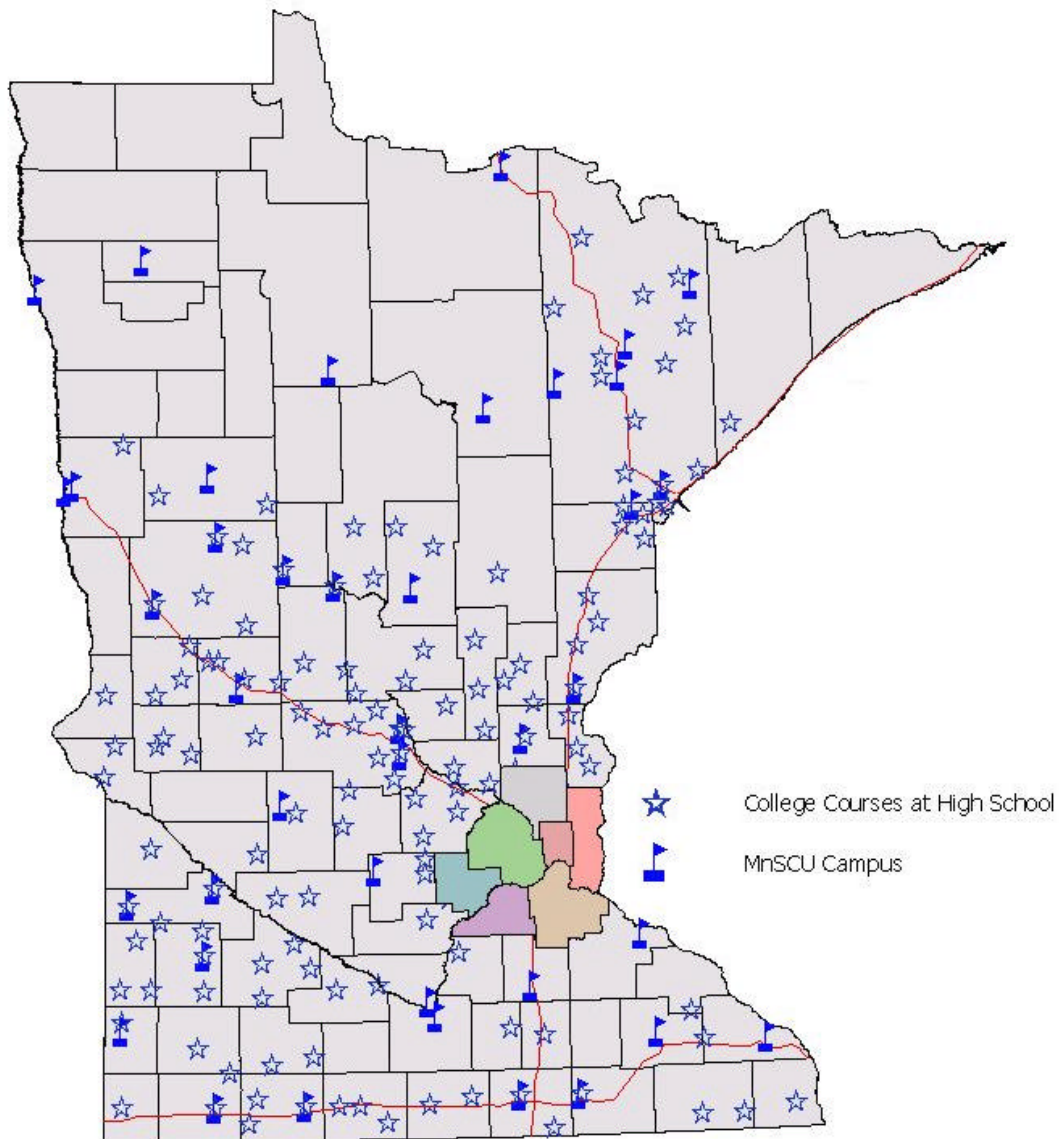
**Exhibit 2-4: Home High Schools of PSEO Students Attending MnSCU Colleges and Universities
1999 – 2000 School Year**



Source: Map prepared by Alexandria Technical College GIS Center based on data extracted from MnSCU ISRS system by Internal Auditing.

Increasingly, secondary school administrators have offered college classes in high school buildings. Exhibit 2-5 shows where MnSCU courses have been made available in greater Minnesota high schools. Few MnSCU courses are taught in high schools in northwest and north central Minnesota; the University of Minnesota - Crookston dominates that region and offers college courses in 28 high schools.

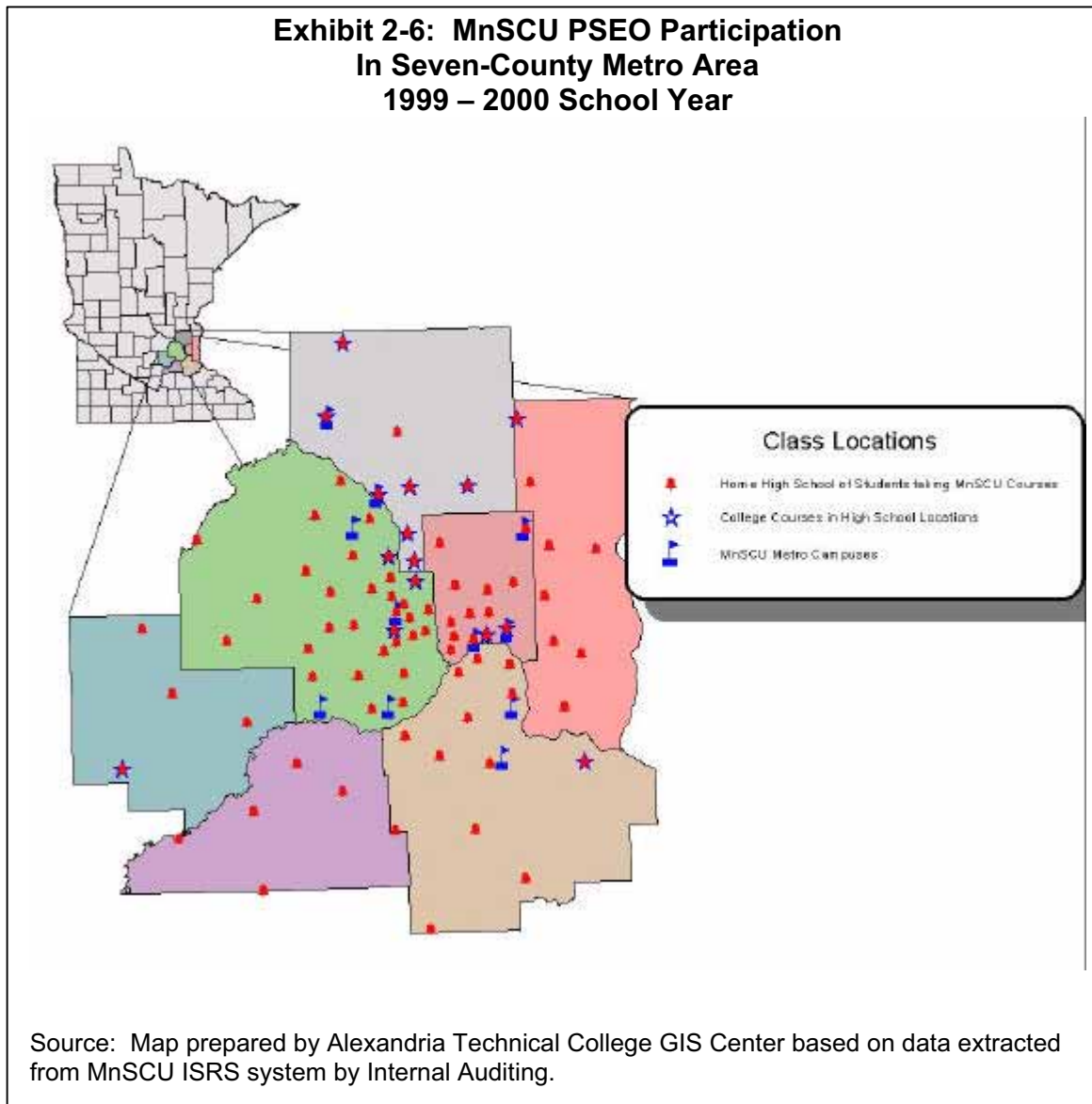
Exhibit 2-5: Locations Where High School Students Earn MnSCU College Credits 1999 – 2000 School Year



Source: Map prepared by Alexandria Technical College GIS Center based on data extracted from MnSCU ISRS system by Internal Auditing.

Exhibit 2-6 shows the extent that metro area high school students participated in MnSCU PSEO programs. Although some students from nearly all metro high schools enrolled in college courses at a MnSCU college or university, few metro high schools sponsor MnSCU College in the High School programs. The University of Minnesota, Twin Cities Campus has a College in the High School program that dominates the metro area market. The University offers college courses in 44 Minnesota high schools, mostly located in the seven-county metropolitan area.

Together MnSCU and University programs are offered in about half the public high schools in Minnesota. During the 1999-2000 school year, MnSCU offered college courses in 163 high schools and the University of Minnesota offered courses in 84 high schools. In a few cases, high schools sponsored courses from both MnSCU and the University to deliver a wider variety of courses to their students.



MnSCU colleges and universities participate in PSEO programs to varying degrees, most often depending on their capacity to teach additional students. Exhibit 2-7 shows the levels of PSEO participation experienced by the different types of MnSCU colleges and universities. Exhibits 2-8 through 2-10 shows enrollment statistics for each college and university.

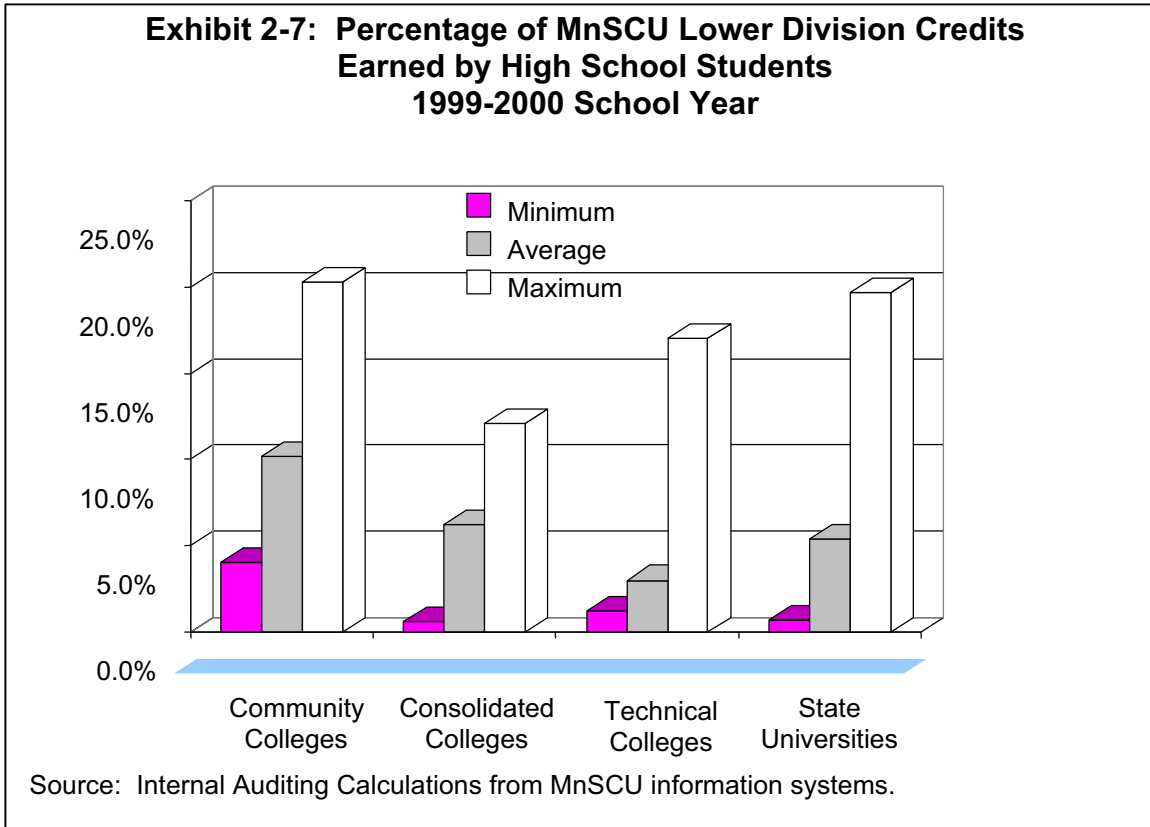


Exhibit 2-11 shows the kind of PSEO programs that high school students are taking through MnSCU colleges and universities. The exhibit shows that about half these high school students physically travel to a college or university campus to earn their credits (CFL funded and contract funded on-campus students). The other half earn the college credits without leaving their high school. Students attending college or university campuses, average significantly more college credits per year (over 16 credits) than the students who stay in their local high schools (about 6 credits). As a result, the students traveling to college and universities campuses account for over 60% of the college credits earned and the corresponding full-year equivalents (FYE).

The credit taking behavior of PSEO students at MnSCU colleges and universities is shown in Exhibit 2-12. It shows that about 1,000 PSEO students are full-time college students and nearly 2,000 other students take more than 16 credits each year. On the other hand, almost 5,000 students take only one college course each year and another 3,000 students take just two college courses.

**Exhibit 2-8: MnSCU College and University
On-Campus PSEO Participation during Fiscal Year 2000**

College or University	CFL Funded		School District Funded	
	Student Count	Total Credits	Student Count	Total Credits
Alexandria Technical College	45	1,020	34	141
Anoka Hennepin Technical College	91	1,745	0	0
Anoka Ramsey Community College	694	12,779	0	0
Bemidji State University	4	92	95	1,548
Central Lakes College	360	6,940	0	0
Century College	360	5,886	1	14
Dakota Technical College	40	603	0	0
Fergus Falls Community College	85	1,278	0	0
Fond du Lac Community College	42	705	0	0
Hennepin Technical College	109	1,747	0	0
Hibbing Community College	60	1,162	0	0
Inver Hills Community College	200	2,812	0	0
Itasca Community College	101	2,464	0	0
Lake Superior College	35	528	54	619
Laurentian District	123	3,032	0	0
Metro State University	26	329	0	0
Minneapolis Community & Technical College	85	711	0	0
Minnesota State College – SE Technical	92	1,520	0	0
Minnesota State University, Mankato	255	3,399	25	405
Minnesota State University Moorhead	170	2,014	0	0
Minnesota West Community & Tech. College	10	169	242	3,103
Normandale Community College	460	7,580	0	0
North Hennepin Community College	434	7,508	1	13
Northland Community & Technical College	26	493	118	1,653
Northwest Technical College	10	217	72	1,164
Pine Technical College	4	38	1	10
Rainy River Community College	62	1,160	0	0
Ridgewater College	197	3,451	0	0
Riverland Community College	281	4,667	0	0
Rochester Community & Technical College	442	8,042	36	263
St. Cloud State University	368	5,249	0	0
St. Cloud Technical College	131	2,089	0	0
St. Paul Technical College	110	1,310	65	907
South Central Technical College	38	727	14	251
Southwest State University	13	221	119	2,048
Winona State University	58	734	0	0
Totals	5,621	94,421	877	12,139

Source: Internal Auditing calculations based on data from MnSCU information systems.

**Exhibit 2-9: MnSCU College and University
Off-Campus PSEO Participation during Fiscal Year 2000** (see note 1)

College or University	College Instructor		High School Instructor	
	Student Count	Total Credits	Student Count	Total Credits
Alexandria Technical College	71	225	0	0
Anoka Hennepin Technical College	0	0	154	720
Anoka Ramsey Community College	0	0	879	5,986
Bemidji State University	0	0	0	0
Central Lakes College	0	0	179	1,228
Century College	0	0	0	0
Dakota Technical College	0	0	0	0
Fergus Falls Community College	0	0	601	5,290
Fond du Lac Community College	6	24	316	2,519
Hennepin Technical College	0	0	0	0
Hibbing Community College	0	0	0	0
Inver Hills Community College	0	0	0	0
Itasca Community College	0	0	0	0
Lake Superior College	48	224	30	96
Laurentian District	0	0	330	3,814
Metro State University	158	525	0	0
Minneapolis Community & Technical College	0	0	0	0
Minnesota State College – SE Technical	0	0	0	0
Minnesota State University, Mankato	0	0	0	0
Minnesota State University Moorhead	0	0	0	0
Minnesota West Community & Tech. College	174	1,416	200	1,109
Normandale Community College	0	0	40	300
North Hennepin Community College	0	0	0	0
Northland Community & Technical College	0	0	0	0
Northwest Technical College	0	0	15	45
Pine Technical College	251	1,292	155	618
Rainy River Community College	0	0	0	0
Ridgewater College	0	0	0	0
Riverland Community College	117	601	262	796
Rochester Community & Technical College	0	0	0	0
St. Cloud State University	0	0	624	2,266
St. Cloud Technical College	0	0	0	0
St. Paul Technical College	0	0	0	0
South Central Technical College	0	0	0	0
Southwest State University	0	0	1,322	7,256
Winona State University	0	0	0	0
Totals	825	4,307	5,107	32,043

Note 1 - Funded through agreements between MnSCU colleges and universities and school districts.

Source: Internal Auditing calculations based on data from MnSCU information systems.

**Exhibit 2-10: MnSCU College and University
Non-PSEO High School Student Participation during Fiscal Year 2000**

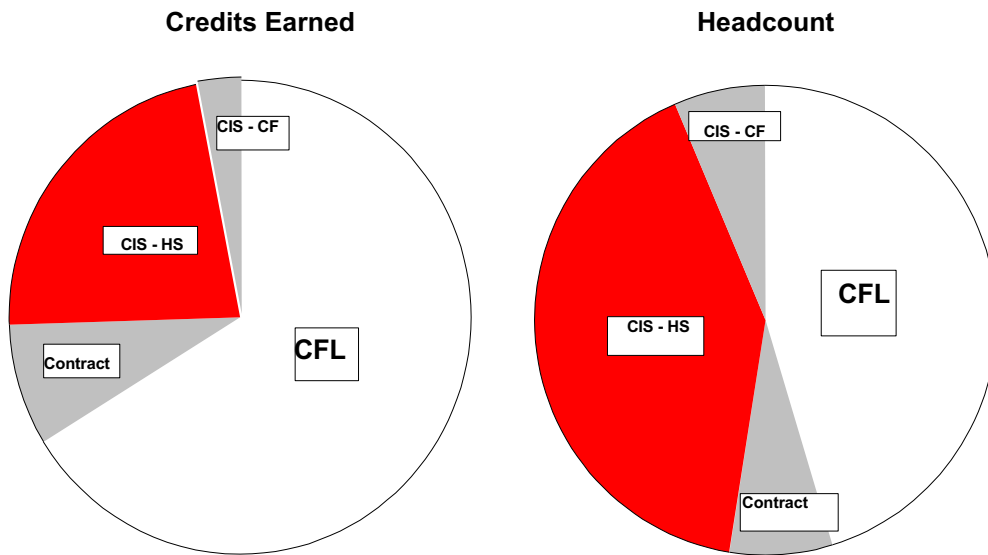
College or University	Other Credit Enrollment		Intermediate School Districts	
	Student Count	Total Credits	Student Count	Total Credits
Alexandria Technical College	15	45		
Anoka Hennepin Technical College	11	30		
Anoka Ramsey Community College	56	282		
Bemidji State University	23	59		
Central Lakes College	18	76		
Century College	62	266	22	222
Dakota Technical College	2	3	26	297
Fergus Falls Community College	9	21		
Fond du Lac Community College	11	53		
Hennepin Technical College	59	210	229	1,966
Hibbing Community College	13	26		
Inver Hills Community College	19	110		
Itasca Community College	17	72		
Lake Superior College (See note 1)	441	1,121		
Laurentian College	36	108		
Metro State University	6	22		
Minneapolis Community & Technical College	6	29		
Minnesota State College – SE Technical	0	0		
Minnesota State University, Mankato	11	71		
Minnesota State University Moorhead	12	94		
Minnesota West Community & Tech. College	96	331		
Normandale Community College	45	231		
North Hennepin Community College	38	164		
Northland Community & Technical College	16	65		
Northwest Technical College	13	64		
Pine Technical College	6	0		
Rainy River Community College	11	17		
Ridgewater College	17	56		
Riverland Community College	0	0		
Rochester Community & Technical College	53	310		
St. Cloud State University	16	75		
St. Cloud Technical College	12	42		
St. Paul Technical College	73	245		
South Central Technical College	5	20		
Southwest State University (See note 2)	385	2,341		
Winona State University	7	101		
Totals	1,620	6,760	277	2,485

Note 1 - This credit total includes 942 credits of Tech Prep recorded on transcripts.

Note 2 - This credit total includes 2,209 credits earned by students attending South Dakota high schools.

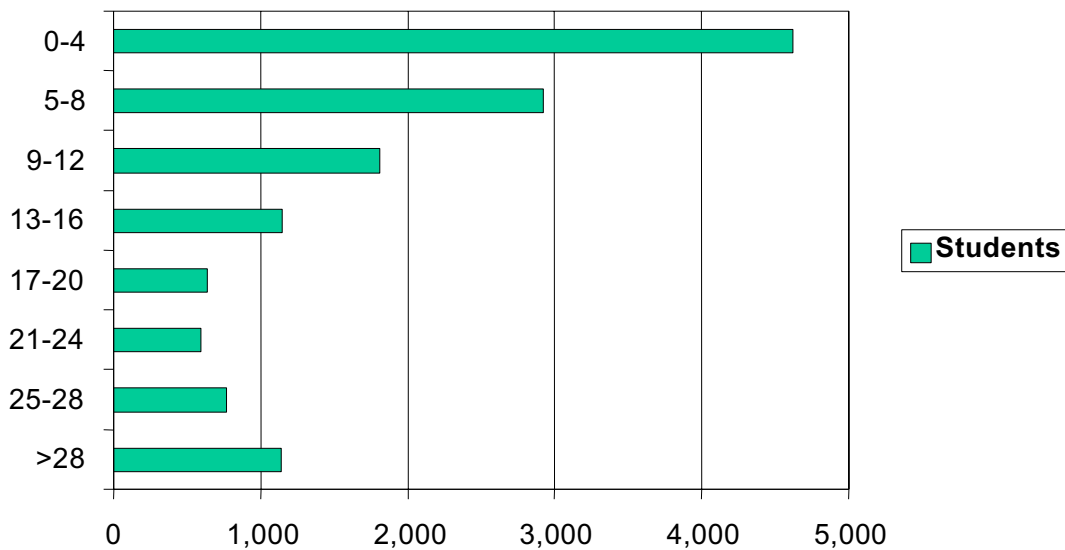
Source: Internal Auditing calculations based on data from MnSCU information systems.

**Exhibit 2-11: Types of MnSCU PSEO Programs
Credit Hours Earned & Headcounts
1999-2000 School Year**



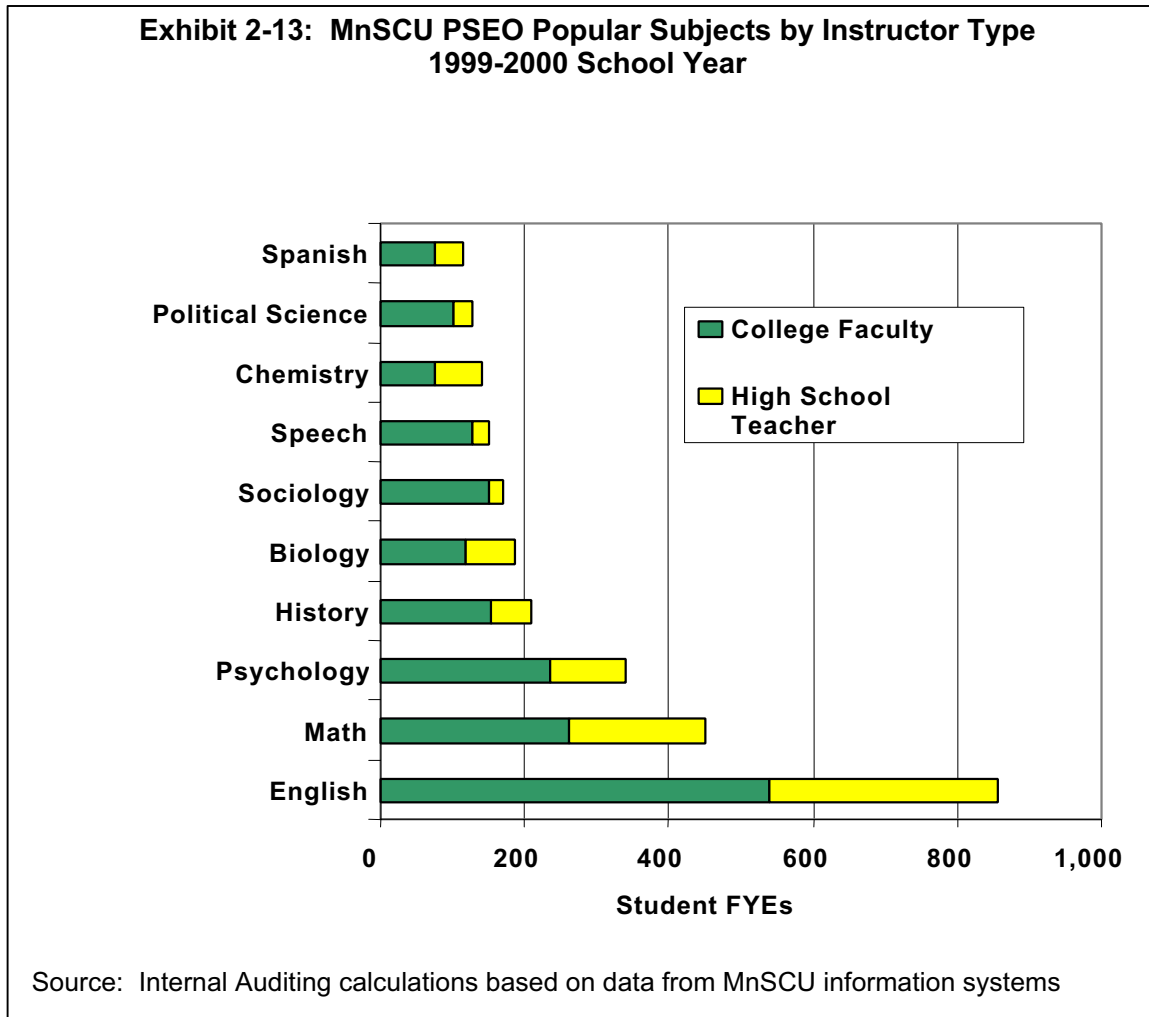
CIS – College in the High School Program (HS = High School Teacher & CF = College Faculty)
 Contract = On-Campus Paid by school districts. CFL= On-Campus Paid by CFL.

**Exhibit 2-12: MnSCU PSEO Student Credit Loads
1999-2000 School Year**

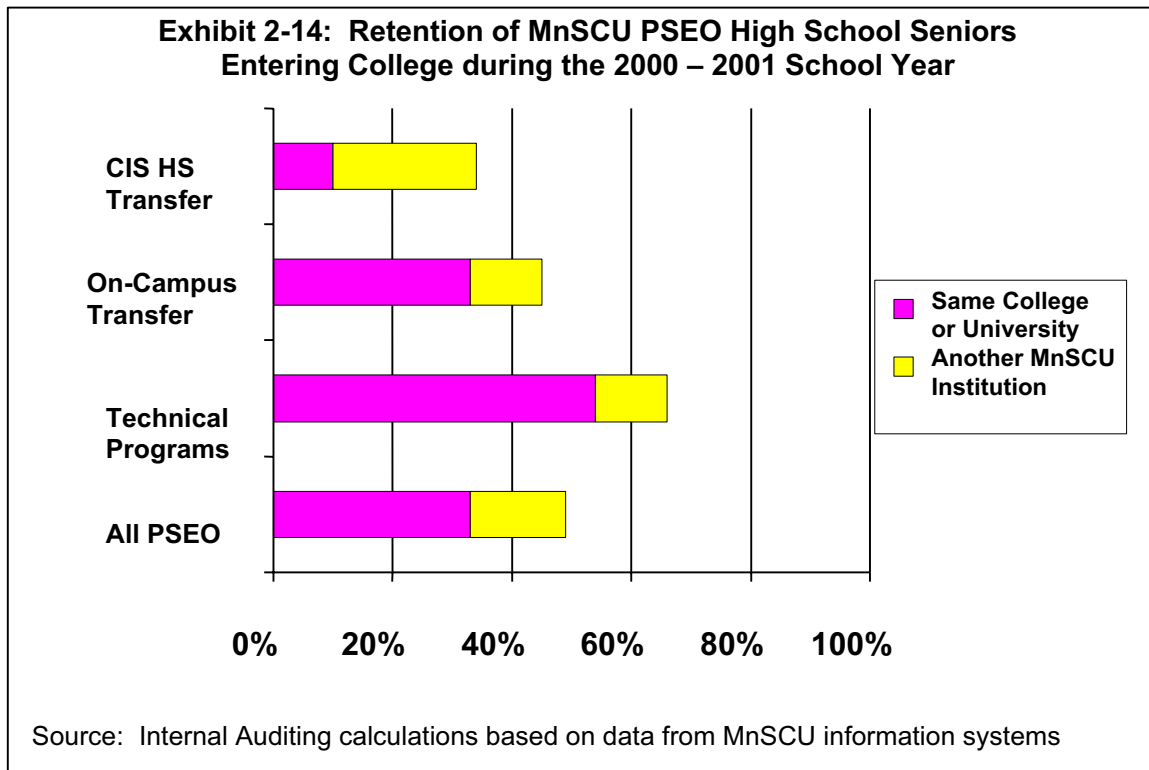


Source: Internal Auditing calculations based on data from MnSCU information systems

Exhibit 2-13 shows the most popular subject taken by PSEO students. Not surprisingly, these courses are skewed toward general education courses, such as Math and English. The exhibit also shows that a significant number of the College in the High School courses were concentrated in general education courses. It should be noted that no technical education courses are shown among the ten most popular courses. This matter is discussed further in Chapter 5.



Finally, it is useful to examine what happens to these PSEO students. Various surveys and studies have shown that the majority of PSEO students continue with college after high school graduation and few students report problems transferring their PSEO credits. We attempted to examine to what extent MnSCU PSEO students return to the same college or university or to a different MnSCU college or university following their high school graduation. The results are shown in Exhibit 2-14.



Opinions of MnSCU PSEO Administrators

In 1995 the Minnesota Office of the Legislative Auditor (OLA), as part of its program evaluation report 96-05, surveyed post-secondary school administrators on their perspectives of the PSEO program. Internal Auditing used several questions from the OLA survey to evaluate if perspectives have changed after five more years of experience with the program. Internal Auditing also used the same set of questions to assess administrators' perspective on the College in the High School programs (the OLA did not study College in the High School programs). The results are shown in Exhibit 2-15.

Post-secondary administrators in 1995 and again in 2000 generally agreed that the program has provided a wider variety of options to students (one of its statutory purposes). MnSCU administrators in 2000 expressed much stronger agreement that the PSEO program also promotes rigorous academic pursuits (its other statutory purpose). Other areas where MnSCU administrators now agree more strongly are:

- ✓ students have gained from their participation,
- ✓ the program is readily available to interested students,
- ✓ secondary staff have encouraged appropriate students to participate,
- ✓ the program has had an overall positive impact on post-secondary schools,
- ✓ post-secondary staff have supported secondary students' enrollment and
- ✓ the program is generally performing in a satisfactory manner.

Only 5% of MnSCU administrators believe that secondary schools should have more control over students’ use of the program. Previously 41% of the survey respondents felt secondary schools should have more control.

Perspectives of MnSCU administrators concerning the College in the High School programs generally mirror their opinions for the on-campus program.

Exhibit 2-15: Comparison of Post-Secondary School Administrators’ Opinions from the Original Legislative Auditor Study in 1995 and Survey Administered by the Office of Internal Auditing in 2000

Survey Questions	Percent Who “Agreed” or “Strongly Agreed”		
	On Campus PSEO		College in High Schools
	OLA Survey Results 1995	OIA Survey Results 2000	OIA Survey Results 2000
The program has generally promoted rigorous academic pursuits?	57%	98%	90%
The program has generally provided a wider variety of options to students?	95	96	95
The time and costs of implementing and running the program have outweighed its benefits?	21	16	10
Students generally have gained from their participation?	83	100	86
The program has had an overall negative impact on secondary schools?	18	8	5
The program is readily available to interested students?	53	83	84
Secondary staff have encouraged appropriate students to participate?	11	35	57
It is too early to judge the program’s overall effect on students?	6	3	5
Parents and students need to be more aware of the risks associated with the program?	87	66	40
Secondary schools should have more control over students’ use of the program?	41	5	11
The program has had an overall positive impact on post secondary schools?	38	68	68
Post-secondary staff have supported secondary students’ enrollment?	68	81	80
Post-secondary schools need to be more selective about admissions?	57	32	20
The program is generally performing in a satisfactory manner?	71	98	90

Source: 1996 OLA report and interviews conducted by Internal Auditing (OIA) in 2000.

Student Views

In December 2000, the Office of Internal Auditing met with representatives of the Minnesota State University Student Association (MSUSA) and the Minnesota State College Student Association (MSCSA) to solicit their views on the PSEO program.

Overall, the students had positive things to say about the PSEO program. Those students who had participated in the PSEO program thought that it definitely was a worthwhile program, their experience was good, and they would recommend and had recommended the program to other high school students.

Nearly all of the students we spoke with from the two organizations had some form of contact with the PSEO program. The students either had participated themselves or had friends who had participated in the program. In fact, two of the students we spoke with from MSUSA had participated full-time and had lived on campus while participating in the PSEO program during their junior and senior years in high school.

We asked the students about their overall awareness of the PSEO program when they were in high school. The students stated that they had all heard about the program. Many of them said they heard the most about the program from other students who had participated. All of the students stated that their high schools did inform them about the program. However, some mentioned that they felt their high schools did not encourage them to participate nor tell them about all of the details of the program. One MSUSA student mentioned that his involvement in our meeting was the first time he had heard that PSEO students could enroll full-time and live on a college or university campus. Another MSUSA student commented that she was concerned about the financial impact the program imposes on school districts and understood why the schools would not encourage participation. The MSCSA students stated that they were unaware of the college in the high school PSEO programs. They wondered whether these students were part of their student organization.

We asked the students whether they had participated in the PSEO program and if not why. Many of the students had participated. Others had chosen not to participate because of their involvement in high school activities such as athletics. Some of the remaining students said they just chose not to participate without specifying a reason.

We also asked the students, while in college, if they knew whether PSEO students were in courses they took. Most of the students thought that PSEO students blended into the classroom and did not stand out from other students. Though, one student mentioned in a course she took that the instructor asked if there were any PSEO students in the room. Some of the students thought that instructors should not treat PSEO students any different than other students. They felt the colleges should ensure that PSEO students receive “a college experience”.

CHAPTER 3

Educational Policy Issues

The MnSCU Board of Trustees has educational policies that govern the PSEO program. Policy 3.5 establishes an admissions threshold for high school juniors and seniors and creates some quality assurance standards for College in the High School programs. Policy 3.3 requires assessing the college readiness of incoming students (including PSEO students). These policies have not been uniformly accepted, interpreted, or implemented. In particular two state universities have not complied with a clear directive contained in Policy 3.5. This experience suggests that the methodology for developing, interpreting, implementing and enforcing PSEO educational policies needs to be reconsidered.

MnSCU Board Policy 3.5 on PSEO is one of the original policies adopted upon establishing MnSCU as a legal entity on July 1, 1995. It is our understanding that much of the existing board policy on PSEO was adopted from a pre-existing policy of the former Community College system. Part 2 of the policy establishes the criteria for enrollment:

The Minnesota State Colleges and Universities shall provide opportunities for students to participate in the Post-secondary Enrollment Options program. Institutions shall establish admissions criteria for PSEO students that promote progress through college-level coursework and that augment their continued academic growth. Criteria for enrollment shall be consistent with the following:

1. All PSEO students shall be enrolled on the basis of available space and/or other appropriate, defined local standards and procedures.
2. All PSEO students shall be expected to perform to the standards to which the institution's non-PSEO students are held accountable. Colleges may establish different academic progress requirements for PSEO students.
3. PSEO students shall not enroll in developmental courses (numbered below 100).
4. For state universities and community colleges, PSEO enrollment shall be limited to juniors in the upper one-third of their class and to seniors in the upper one-half of their class.
5. Students who do not meet these criteria may be considered for participation in PSEO through special appeal by the high school counselor or principal.
6. Certain restrictions or guidelines shall apply to PSEO classes provided on-site at Minnesota high schools.

- (1) Classes shall be discrete, college or university level courses which do not simultaneously enroll PSEO and non-PSEO high school students.
- (2) If colleges and universities select a high school teacher to provide PSEO instruction, the college or university of record shall provide a faculty mentor to the high school teacher to ensure that courses are at a collegiate level. High school teachers selected to provide PSEO instruction shall meet appropriate faculty qualifications.
- (3) Colleges and universities shall only offer courses for PSEO students that are approved through the curriculum process.

Criteria 1-3 of the policy essentially restate provisions from state law. Criteria 4-6, though, establish standards that are unique to MnSCU.

Since the adoption of Board Policy 3.5, there have been significant changes in how PSEO programs are packaged and administered. There have also been significant changes in the student populations, such as the dramatic growth of home school students, that are not addressed by the policy. These changes suggest that the policy should be revisited and updated as necessary. Until changes are adopted, compliance should be expected with any provisions that are clear and reasonably achievable. Two MnSCU universities, however, have not complied with certain clearly stated provisions of the PSEO policy. The inability to enforce this policy challenges the authority of the MnSCU Board of Trustees.

1. MnSCU Academic Affairs needs a methodology for implementing and enforcing PSEO educational policies.

The MnSCU Board of Trustees has approved 25 educational policies. Two policies pertain most directly to the PSEO program, Board Policy 3.3 on Assessing the College Readiness of Incoming Students and policy 3.5 on the PSEO program. No procedures or implementation guidelines have been developed for either policy. Also, a process does not exist for enforcing compliance or periodically reviewing the effectiveness and practicality of these policies. There are at least four essential stages to having effective policies. Problems encountered at any of these four stages may result in policies that are applied inconsistently or simply ignored.

- **Development** includes both creating new policies and updating and maintaining existing policies. Before creating a policy, its need and scope should be addressed. Creation of new policies should be an open, participatory process that allows all stakeholders to voice their opinions and preferences. It should be a deliberative process that attempts to gain general acceptance, establishes sufficient clarity, ensures a high degree of conformity. There also must be a process to update policies so that relevance to practical situations is maintained and adaptations to changing business or environmental changes are made timely. Some stakeholders may disagree with certain aspects of a policy and may seek changes to it. Nonetheless, they should be

expected to comply with the policy provisions until any changes are formally accepted.

- **Implementation** includes communicating policy requirements and training users in their application. An effective communication methodology includes building an awareness of new or changed policies, introducing existing policies to new users, and periodically reminding users of policy contents.
- **Interpretation** provides a means for users to seek clarification on policy requirements and helps ensure that consistent application of policies is achieved. One method of gaining a uniform understanding of policies is through the development of procedures or guidelines for their application. Procedures must be consistent with policy directives, but do not require board approval and may serve as an expeditious way to adapt to new practices and conditions.
- **Monitoring and Enforcement** ensures that there will be a high degree of conformance to policy requirements. It should provide a mechanism to evaluate policy compliance and provide for remedial or disciplinary action when non-compliance is discovered.

As illustrated in Finding 2, non-compliance with PSEO policies has occurred without any consequences. Also, Finding 3 demonstrates an example where a policy is unclear and subject to varying interpretations. These situations could be remedied by establishing an effective methodology to ensure there is uniform understanding and compliance with board policies.

Recommendation

- *MnSCU Academic Affairs should work with colleges and universities and the Board Educational Policy Committee to establish a methodology for reviewing, implementing, and enforcing educational policies.*
- 2. Southwest State University and St. Cloud State University have not complied with the MnSCU board policy that requires College in the High School courses to be taught to discrete classes that contain only students earning college credits.**

Southwest State University and St. Cloud State University⁶ have aggressively marketed College in the High School programs and been willing to allow exceptions to criterion 6 (1) of board policy. The universities have allowed the exceptions in order to offer the program to small, rural high schools. Small high schools in particular are often challenged to interest enough students in these courses to fill a classroom. As a result, secondary school administrators prefer to mix students that are earning only high school credits with the students earning college credits. Southwest State University provided letters from seven secondary school teachers and administrators arguing that disallowing

⁶ Southwest State University refers to its program as the “Challenge Program” and St. Cloud State University refers to its program as the “Senior to Sophomore Program.”

mixed classes discriminated against small high schools and would deny those students the opportunity to earn college credit. The practice of mixed classes, however, is not allowed by MnSCU board policy and there is no provision for allowing exceptions.

In a letter dated April 10, 2001, the Executive Director of Internal Auditing informed the presidents of Southwest State University and St. Cloud State University about this violation of state policy. In a letter dated May 16, 2001, Dr. Dennis Nielsen, Southwest State University President *ad interim*, responded by stating, “We strongly believe that although we may be technically violating Board policy upon occasion, we are not compromising the fundamental purpose or quality of the PSEO program. In fact, we believe that the educational experience for all enrolled students is enriched.” Dr. Nielsen’s letter also indicated that, “Ideally, I hope that you will find our case compelling enough to recommend necessary changes in Board PSEO policy. However, if you remain unconvinced after reviewing this information, it is then our desire to develop an action plan that fully complies with Board policy.” In a letter dated May 17, 2001, Dr. Roy Saigo, St. Cloud State University President, stated, “While we disagree with the interpretation of the policy, SCSU will comply beginning in the fall term.”

We do acknowledge that the current policy is rigid and may disadvantage small high schools. However, the policy is clear and unambiguous regarding “discrete” classes. Furthermore, other MnSCU colleges and universities have been troubled by non-compliance with this board policy. Some college administrators have complained that they face a competitive disadvantage due to complying with the policy. Other administrators believe that the current policy is well founded and necessary to ensure appropriate academic rigor. For example, one Chief Academic Officer defended the existing policy and explained that an instructor teaching a mixed class of students may dilute the curriculum to reach the lowest common denominator of student learning level. Irrespective of the arguments for and against this policy, it is current policy and compliance should be expected of all MnSCU colleges and universities.

Recommendation

- *Southwest State University and St. Cloud State University must comply with Board Policy 3.5 requiring that College in the High School classes be offered on a discrete basis.*

3. It is unclear whether Board Policy 3.3 on Assessment for College Readiness applies to PSEO students taking only one or two courses.

Practices for implementing Board Policy 3.3, Assessment for College Readiness, varied widely. Some colleges required all incoming PSEO students to take tests in reading comprehension, writing, and mathematics. Other colleges and universities may require PSEO students to take only some of the assessment tests. In some cases, particularly for College in the High School students, no assessment tests are required. The variances in implementing this policy have caused significant tension between within MnSCU.

Board Policy 3.3 requires that all incoming students be assessed for college readiness. It makes no explicit exception for PSEO students. Part 1., Incoming Student Assessment, contains the following provisions:

Subpart A. Each college and university shall require all students to complete an incoming student assessment that includes basic measures of reading comprehension, writing, and mathematics on system-endorsed tests, except as provided in Subpart C. The incoming student assessment shall not be used to make admissions decisions.

Subpart B. Upon recommendation of the Assessment for College Readiness Committee, the Chancellor or designee may approve the local adoption of an alternative to the system-endorsed instrument in no more than two of the three subject area measures in reading, writing and mathematics.

Subpart C. Each college and university shall develop campus guidelines which exempt some students from all or portions of the incoming student assessment based on presentation of transcript or equivalent evidence of adequate preparation or prior education, enrollment in non-credit continuing education or customized training, or enrollment in a one- or two-course program of study.

Some MnSCU colleges and universities have interpreted Subpart C of the policy as allowing an exception for PSEO students taking College in the High School courses. These students often take only one or two courses, which has been interpreted as being consistent with the exception for “a one- or two-course program of study.” One university also argued that the use of class rank as a PSEO admission standard provides an acceptable alternative to assessment testing. Some technical college administrators see little value in administering assessment tests to students that are not expected to take English or Mathematics courses as part of their program of study.

Academic Affairs has a committee that oversees this policy. The committee, however, has had difficulty gaining a consensus on implementation strategies and has made limited progress on gaining uniformity in practices.

PSEO students face more severe consequences for failing a college course than regular college students who fail; the PSEO student may also fail high school. Therefore it is essential that extra precautions be taken to screen high school students who wish to participate in PSEO. Class rank, unto itself, may not be a definitive indicator of college readiness. The recent report, Getting Prepared: A 2001 report on recent high school graduates who took developmental/remedial courses⁷ found that 32% of Minnesota

⁷ Issued jointly by MnSCU and the University of Minnesota on March 5, 2001.

public high school graduates in 1999 who enrolled at public colleges and universities were required to take one or more developmental classes. PSEO students are not eligible to take developmental classes.

We also are uncertain whether the policy intended to exclude College in the High School programs. As shown in Exhibit 2-13, the most popular College in the High School programs are English and Mathematics. So, although these students may take only one or two courses, the subject matter may be what is measured most directly by the assessment tests.

Recommendation

- *MnSCU Academic Affairs must develop procedures and guidelines for implementation of Board Policy 3.3 and, if necessary, seek a policy amendment to clarify its application to PSEO students taking one or two courses.*

4. The policy setting the necessary academic credentials for high school instructors who teach MnSCU sponsored College in the High School courses is unclear.

MnSCU Policy 3.5, part 2, subpart 6(2) states that high school teachers selected to provide PSEO instruction shall meet ‘appropriate’ faculty qualifications. Although the term ‘appropriate’ is not defined, it is widely believed that high school teachers must meet the minimum qualifications for the assigned field based on the composite credentials list contained in the labor contract for community college faculty (MCCFA). With the exception of occupational type subjects, the contract requires instructors to hold a master's degree in the assigned area or 23 graduate quarter / 16 semester credits in the assigned area. This interpretation, however, would prohibit colleges from exercising the flexibility granted under contract for hiring adjunct or temporary faculty members when using high school teachers. Also, it would be awkward applying the interpretation to state university faculty. The Inter Faculty Organization (IFO) contract does not include a composite list of credentials; minimum qualifications are generally monitored at the department level at a university.

Currently there are six MnSCU colleges and universitiess that have significant College in the High School programs⁸. Of these six, two are state universities and four are two-year colleges. The two-year colleges attempt to utilize high school teachers who meet the labor contract credentials requirement, but allow departures from the minimum requirements. In particular colleges may have difficulty finding teachers who meet the MCCFA credential requirements at small, rural high schools. In that situation, some colleges increased the role and number of credits provided to the college mentor assigned to work with the high school teacher.

About two years ago the MCCFA filed a grievance alleging that the use of high school teachers to deliver community college instruction at a high school was ‘subcontracting’ and that the arrangement violated the statutory restrictions on subcontracting. The union

⁸ As shown in Chapter 2, another six colleges have smaller College in the High School programs.

also alleged that the use of high school teachers was in violation of the labor agreement because MCCFA members in layoff status in the same field should have the right to teach these College in the High School courses.

The grievance was denied. However, MCCFA filed a second grievance alleging that MnSCU was not in compliance with the 'hiring practices' provision of the bargaining unit agreement. At the same time MCCFA was pursuing 'hiring practice' contract language changes at the bargaining table. An agreement was reached and the 'hiring practices' provision in the bargaining agreement was modified. It requires that each college employ no less than 67% of the total FYE MCCFA bargaining unit faculty as unlimited full time faculty. Based on this agreement the 'hiring practices' provision would take into consideration the credits taught by high school teachers. Specifically, the 'hiring practices' calculation was modified to include 50% of the current PSEO credits being delivered by high school teachers.

In exchange for this contract language change, the MCCFA agreed to drop the grievance related to the use of high school instructors to deliver college credits. Although the grievance was dropped, this issue may not be fully resolved. During our interviews with college administrators, we sometimes heard that the college would not participate in College in the High School programs because of lack of support from the faculty union.

The role of mentors assigned to work with high school teachers and the process used to assign mentor credits varies considerably throughout MnSCU. The six colleges and universities with significant College in the High School programs averaged 4.25 mentor visits for the first time a high school teacher delivered a college level course. The actual number of visits for first time teachers ranged from two to five. These six colleges and universities required an average of 3.0 visits if the high school teacher previously had taught the College in the High School course. The actual number of visits ranged from two to four. The visits commonly included an initial planning meeting, site visits to observe teaching and related student response, and follow-up visits. Some colleges and universities also required that the mentor deliver a guest lecture.

To compensate the mentors, some colleges and universities assigned a predetermined number of credits per semester or course while others have developed a matrix or use a mentor to student ratio when assigning mentor credits. For example, three colleges continued to follow a former Community College System Memorandum of Understanding (MOU) that established mentor workload credits. Under this MOU, mentors were awarded 1 credit if it was the first time a high school teacher was delivering the course for college credit. Mentors were awarded .5 credits if the high school teacher repeated a college course taught previously. One college has agreed to provide an additional credit for a mentor, if the high school teacher does not have the academic credentials required by the MCCFA labor contract.

Recommendations

- *MnSCU Human Resources, in cooperation with Academic Affairs, should establish a clear interpretation of the meaning of “appropriate” faculty credentials*
- *MnSCU Academic Affairs should develop guidelines for the role of college mentors assigned to high school teachers.*

5. MnSCU board policy does not establish admissions requirements for all PSEO students.

MnSCU Board Policy 3.5, part 2, subpart 4 establishes minimal admissions standards for only community college and state university PSEO students. The policy was purposely silent on PSEO students enrolling in technical colleges, allowing each college to establish its own admissions standard. The policy was developed before the creation of consolidated colleges and does not address them. Also, because the admission standard is based on high school class rank it does not accommodate a measure for determining the eligibility of home school and alternative learning center students.

Some colleges and universities have chosen to establish admissions standards that are more stringent than board policy. The policy is silent on whether more stringent admissions standards can be established.

Consolidated colleges faced the added difficulty of tracking technical college students separately from students enrolled for liberal arts courses. Thus, a student could be accepted into a technical education program without meeting the PSEO admissions standards. We saw evidence that some students accepted into technical education programs were later able to register for liberal arts courses at a consolidated college, without meeting the college’s PSEO admission standard. If technical education students are to continue to be subject to less stringent admission standards, then they should be subject to more rigorous registration and academic monitoring practices.

Finally, if the program is expanded to allow greater access for at risk students, as discussed in Chapter 5, then it may be necessary to establish a different track of admission standards based on student conduct and potential for academic achievement.

Recommendation

- *MnSCU Academic Affairs should seek an amendment to update Board Policy 3.5, part 2, subpart 4 for circumstances that it does not address currently, including home school students, alternative learning center students, students enrolling in technical education programs, and students attending consolidated colleges.*

CHAPTER 4

Quality Improvement Opportunities

The rapid growth of PSEO programs at MnSCU colleges and universities has created new challenges to preserving the quality of academic programs and ensuring the academic achievement of high school students. The academic performance of most high school students attending college and university campuses has been impressive; although a significant number of high school students fail or withdraw from courses taken at college and university campuses. Also, several College in the High School programs should reevaluate their quality assurance features, particularly standards for assessing student performance. There are additional improvement opportunities with student data, program information, secondary school relationships, and obtaining feedback from program participants.

The background and statistical information presented in Chapters 1 and 2 shows a very positive and productive picture of MnSCU's experience with the PSEO program. Opportunities for high school students to earn college credits are widely available in varying forms. The program has proven to be enormously popular with students, parents, and legislators. Our interviews and data analysis, however, revealed some areas that need improvement, specifically:

- Lowering the failure rate for high school students taking courses at college campuses,
- Ensuring the academic rigor and standards for assessing student performance for College in the High School programs,
- Enhancing the integrity, consistency, and availability of student and financial data recorded on MnSCU information systems,
- Improving the communication and availability of information about PSEO opportunities,
- Working with the Minnesota Department of Children, Families, and Learning and secondary school representatives to remove barriers and disincentives for high school students participating in the PSEO program, and
- Conducting periodic surveys or assessments of student, parent, and secondary school satisfaction.

6. The failure rate for on-campus PSEO students justifies several colleges and universities implementing additional safeguards to either improve academic performance or reconsider a student’s eligibility for the program.

On average, PSEO students attending courses at college and university campuses consistently earned higher grades than college and university students taking the same courses. Despite high average academic achievement, on-campus PSEO students failed to earn a passing grade⁹ for over 10% of the credits taken. PSEO students face potentially adverse consequences for failing a college or university course. In extreme circumstances, the student may fail to earn enough credits to graduate from high school. In other cases, students fail to realize that their PSEO grades become part of their official transcript and may imperil their ability to make satisfactory academic progress when enrolling in college after high school graduation. Several college and university representatives from the student associations shared anecdotal evidence of high school students dropping out of high school as a result of failing PSEO courses. One university administrator told us that, “Every year at least one high school student does not graduate from high school because of poor college grades.”

As Exhibit 4-1 shows, the course failure rates varied considerably at different colleges and universities. Generally, we did not find that colleges and universities had set goals or targets for PSEO students’ academic achievement. Also, we did not find that colleges or universities monitored the overall failure rates of their PSEO students. As the exhibit shows, five colleges experienced PSEO course failure rates of over 20% during the 1999-2000 school year. Two state universities (Southwest State and Winona State) and one consolidated college (the former Laurentian District) held course failures for PSEO students to less than 6%. These institutions had assigned clear responsibilities for counseling and monitoring the academic progress of PSEO students.

**Exhibit 4-1: PSEO Course Taken On Campus
Failure Rates by Institution Type
1999-2000 School Year**

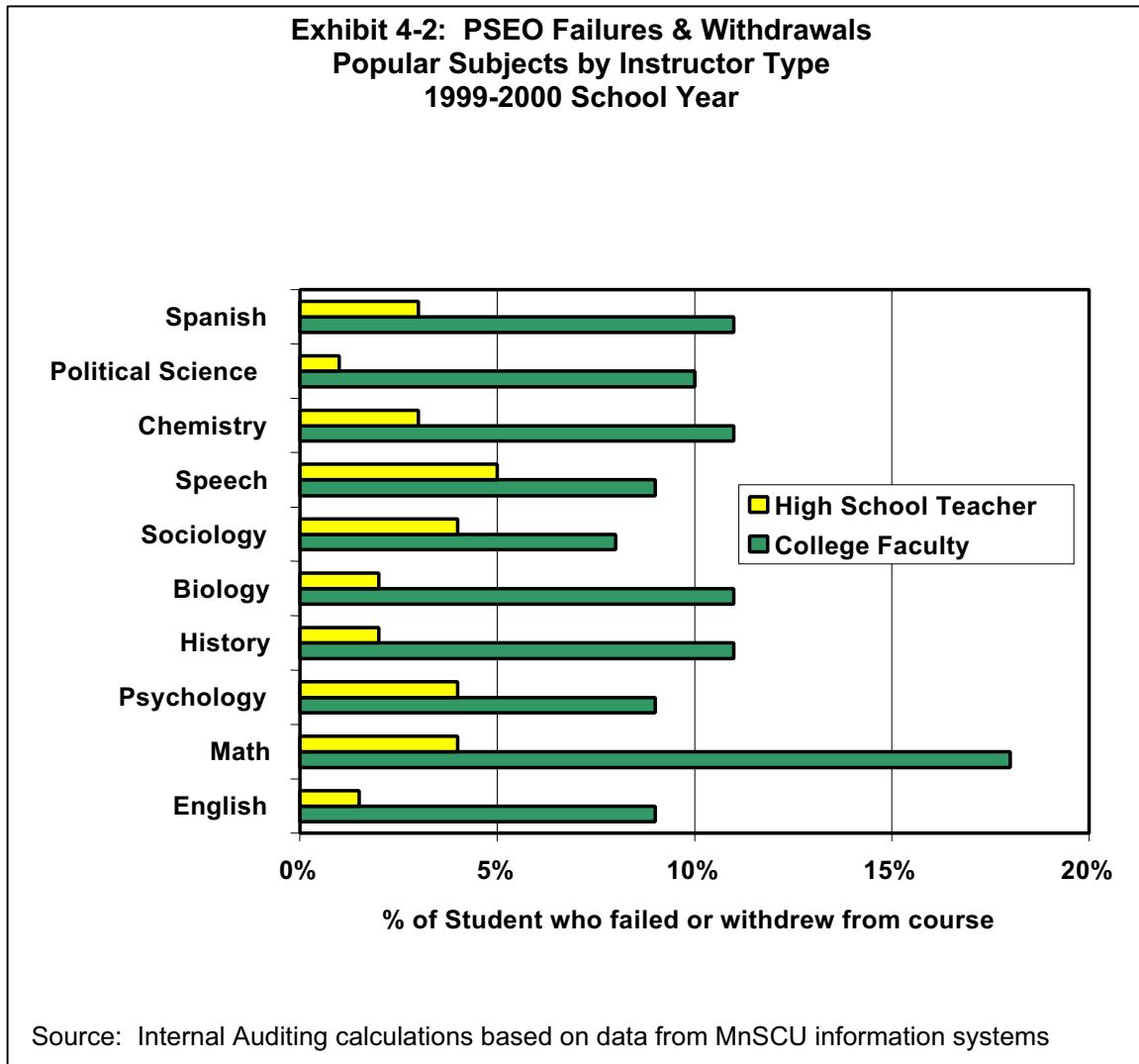
Institution Type	Number of Colleges & Universities with Failure Rates of				
	Over 20%	11 – 19%	9 – 10%	7 – 8%	6% or Less
Technical Colleges (1)	3	3	3	0	0
Community Colleges	1	2	2	3	0
Consolidated Colleges	1	5	1	3	1
State Universities	0	2	1	2	2
Totals	5	12	7	8	3

(1) One technical college was excluded from this analysis because it had fewer than 50 PSEO credits attempted on campus during the 1999-2000 school year.

Source: Internal Auditing calculations based on data from MnSCU information systems.

⁹ Grades of “F” or “W” were considered to not be passing grades. The grade of “W” is transcribed if a student remains enrolled in the course past the drop/add period before withdrawing from the course.

Student failure rates also varied widely depending on the type of college courses being taken. As shown in Exhibit 4-2, nearly 20% of PSEO students received an “F” or “W” grade in math courses taught by college faculty. Failure rates were closer to 8% for other courses. Interestingly, the exhibit shows that courses taught by high school teachers (College in the High School programs) had significantly lower failure rates. Some of this phenomenon may be due to possible grade inflation (discussed in the next Finding), but closer monitoring of academic progress may also contribute to greater academic success.



PSEO students taking courses on a college or university campus do not have the same safety net available to them as in high school. This increased freedom is one reason why many PSEO students seek out college courses. Many PSEO students, in fact, flourish in the college environment. Unfortunately, it also allows students that are either unprepared or unmotivated to fail in college. Some college administrators observed that PSEO students may be more likely to lack the confidence or maturity to participate freely in

class discussions or to seek assistance outside the classroom. Other administrators shared examples of high school students abusing the freedom extended to college students.

Many colleges and universities believe that PSEO students should be treated the same as other college students. Some college administrators wondered if high school counselors and parents understood that PSEO students were not subject to the same strict academic monitoring as high school students. High school counselors and parents usually would not be aware that a PSEO student was experiencing academic difficulties until the semester grades were released. Also, high school students held to the same satisfactory academic progress policies as other college and university students would go on academic probation for receiving poor grades, but could still register for courses in the next term.

Many PSEO students are allowed to register for classes without seeing a post-secondary counselor. College and university students generally are not directed to counselors unless they encounter risks related to personal adjustment, career goals, or motivation. Some colleges and universities believe that all PSEO students face sufficient risk to assign them to post-secondary counselors; while other colleges and universities assign an academic advisor to assist PSEO students with registration. We understand that the distinction between the roles of counselors and academic advisors has been a sensitive issue at some colleges and universities. Nonetheless, it is important that PSEO students receive sound advice on course selections, transfer options, and have their academic progress monitored closely. Although Board Policy 3.3 allows that, “Colleges may establish different academic progress requirements for PSEO students”, we found that MnSCU colleges and universities, usually did not take advantage of this provision. Recognizing these added challenges faced by PSEO students, we believe that colleges and universities should consider using counselors to advise and oversee the academic progress of PSEO students. At least, it would be prudent for PSEO students to be assigned initially to a post-secondary counselor. If a PSEO student demonstrated the maturity and motivation to succeed academically and socially, then the student could be reassigned to an academic advisor.

Finally, it is worth noting that several other states have aggressive methods to motivate high school students to achieve satisfactory academic performance. Three states (Ohio, Iowa, and Colorado) shift the financial obligation for paying the tuition and fees for PSEO students to parents when students fail to complete courses. Massachusetts requires high school students to earn a grade of “B” or better in college courses in order to retain their eligibility in the program. These remedies seem harsh in the Minnesota environment and are not likely solutions. More moderate solutions are available, however. For example, the University of Minnesota, Twin Cities campus, requires PSEO students to reduce their course load, if they earn a grade of “C” or lower in any class.

Recommendations

- *Colleges and universities should consider establishing more stringent practices for counseling and monitoring the academic progress of PSEO students. Possible practices include:*
 - ✓ *Require PSEO students to receive counseling services from a post-secondary counselor,*
 - ✓ *Establish timely and aggressive monitoring of academic progress,*
 - ✓ *Consider limiting PSEO eligibility for any high school student who fails to earn a passing grade in any college or university course.*

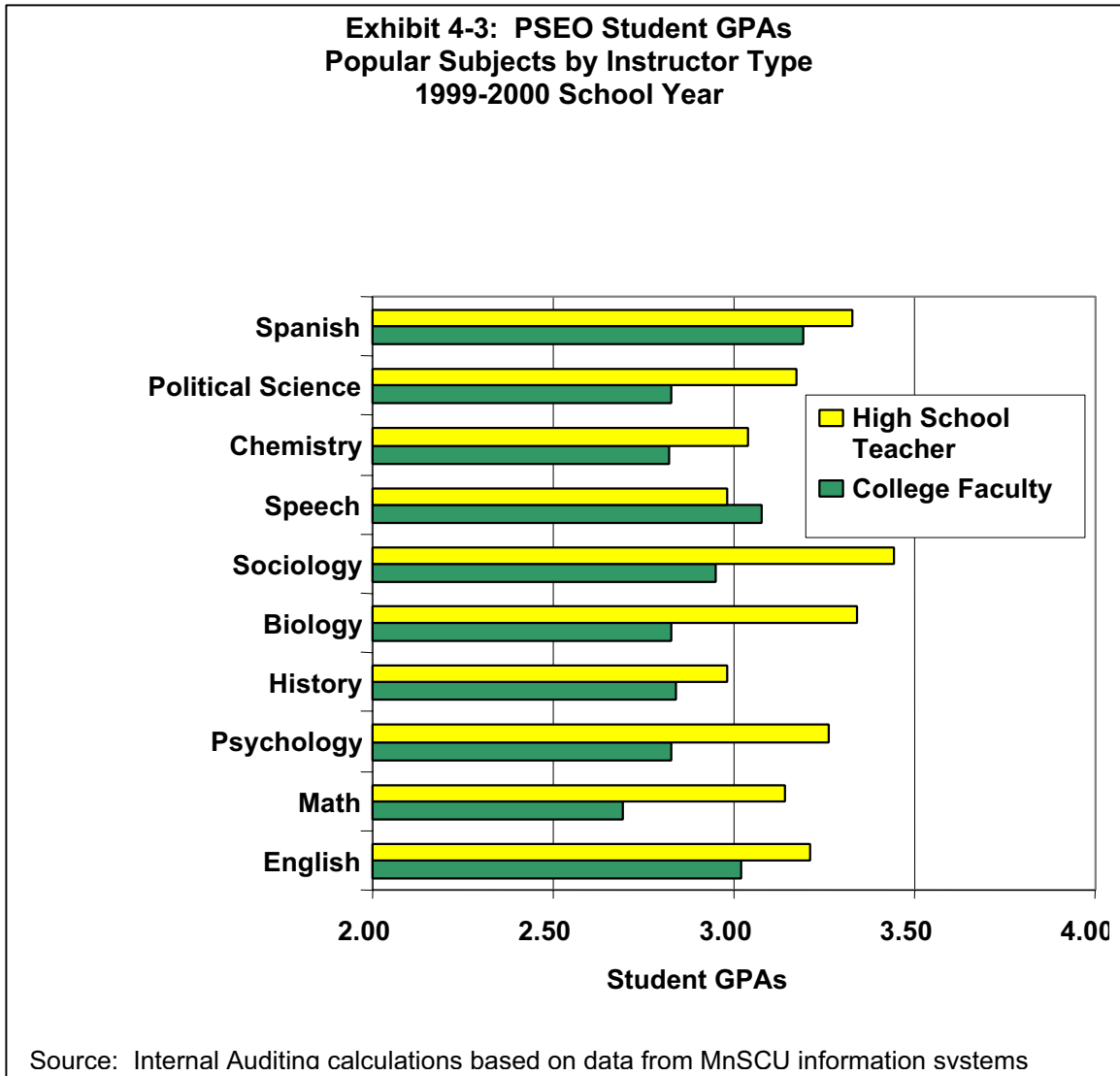
7. Most College in the High School students are awarded grades that, on average, are significantly higher than grades that college faculty award to on-campus PSEO students who take similar courses.

College in the High School students taught by high school teachers usually were awarded higher average grades than PSEO students who were taught by college faculty. For the 1999-2000 school year, the grade point average for all PSEO courses taught by college or university faculty was 2.92. During the same year, the grade point average for all College in the High School courses taught by high school teachers was 3.16. Exhibit 4-3 shows that for nine of the ten most popular PSEO subjects, high school teachers awarded higher average grades than college faculty.

The College in the High School average is close to the 3.22 grade point average that the College Board reported for all college bound high school seniors in 1996.¹⁰ Arguably, more stringent monitoring of academic progress and more seat time for courses taught in high schools could account for some of the difference in academic achievement. One administrator discounted the effectiveness of additional seat time, however, and explained that high school courses usually expect a 1:1 ratio of homework to class time, while college courses should expect a 2:1 ratio.

The pattern of possible grade inflation was not apparent, however, in College in the High School courses sponsored by Southwest State University and the former Laurentian District (now Mesabi Range College and Vermilion Community College). College in the High School students earned comparable grades to students taking similar courses at those campuses.

¹⁰ Research Notes, RN-04, published by the College Board Office of Research and Development, May 1998.



The success of the programs at Mesabi Range College and Vermilion Community College are likely due to mentors playing a strong role in developing examinations and grading standards. Mesabi Range College has a ‘Concurrent Enrollment College Collaborator’s Packet’. It contains tips for mentors, college faculty checklists, and model reports. It also has a 20 page ‘Concurrent Enrollment Program Administrative and Faculty Handbook’. The purpose of this handbook is to answer questions about roles, duties and tasks of high school administrators, teachers, counselors, college faculty and other participating personnel. It emphasizes that staff and personnel at both colleges and high schools must work cooperatively to bring an excellent program to students. Vermilion Community College consolidated similar information into a 28-page handbook entitled “Concurrent Enrollment Program Administrative and Faculty Handbook.” Both colleges offered a summer orientation program for high school teachers selected to teach College in the High School programs. The colleges also required mentors to serve as guest lecturers at a least one class session per semester.

The success of the Southwest State University College in the High School program may be attributable to the university's participation in developing and implementing the National Alliance of Concurrent Enrollment Partnerships (NACEP). NACEP was established during the American Association of Higher Education Conference in November 1999 as an organization of education professionals who administer or participate in Concurrent Enrollment Partnerships (CEP). It links college-school partnerships offering college courses in high schools. NACEP supports and promotes its constituent programs through quality initiatives, program development, national standards, research, and communication. NACEP has three standards on student assessment:

- (1) CEP students must be held to the same standards of achievement as those expected of students in on-campus sections.
- (2) Every section of a course offered through a CEP is annually reviewed by faculty from that discipline and CEP staff to assure that grading standards meet or exceed those in on-campus sections.
- (3) CEP students must be assessed in the same manner as their on-campus counterparts.

Other states have adopted various mechanisms to ensure consistent measures of student academic performance. For example, in June 1999, the Missouri Coordinating Board for Higher Education adopted new policy guidelines¹¹ for its College in the High School courses (referred to as "dual credit" courses). The Missouri guidelines state:

The responsibility for the development of assessment and evaluation measures to assure quality and comparability of dual credit courses resides with the on-campus college faculty in the appropriate academic discipline. In general, comparability between the dual credit course taught in the high school and the corresponding course taught on the college campus should be demonstrated by using the same methods of assessment or identical testing procedures and by employing the same means of evaluation, which will be supervised by the appropriate faculty on the college campus.

Finally, the University of Minnesota, Twin Cities campus College in the Schools (CIS) program has some features to be considered. The program requires participation in a "course-specific summer workshop for new CIS instructors prior to the first year of teaching in the program" and participation in "regularly scheduled CIS workshops during the summer and academic year. These workshops are essential to maintaining the critical link between the high schools and the University of Minnesota and for ensuring the quality and integrity of the CIS program."¹²

¹¹ Copies of the guidelines are available at <http://www.mocbhe.gov/Acadafrs/dualcred.htm>

¹² See <http://www.cce.umn.edu/cis/>.

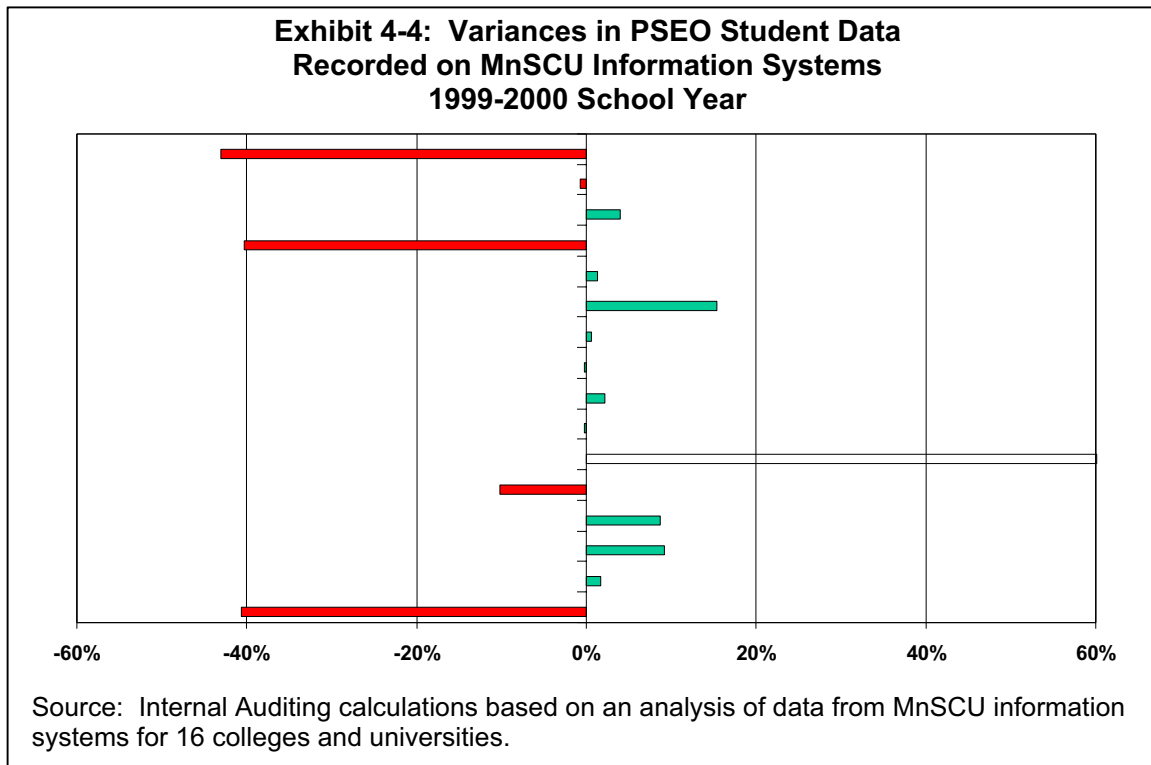
Recommendations

- *MnSCU colleges and universities should reevaluate their quality assurance features for College in the High School programs. Particular emphasis should be focused on standards used by high school teachers to assess student performance. Possible improvement ideas include:*
 - ✓ *Adopt the National Alliance of Concurrent Enrollment Partnership standards.*
 - ✓ *Monitor grades awarded to College in the High School students, compare them to grades awarded to on-campus students, and explore significant variations in grading patterns.*
 - ✓ *Require mentors to be more active in the College in the High School courses, such as serving as a guest lecturer or grading selected examinations or papers.*
 - ✓ *Provide training and workshops for high school teachers in the rigor associated with college-level curriculum and student assessment standards.*
 - ✓ *Include the high school teachers in the academic life of the supervising college or university department, as much as possible.*

8. The integrity and consistency of student and financial data on the PSEO program needs improvement.

We encountered significant difficulties in working with the PSEO student data for that was recorded on MnSCU information systems. The MnSCU Finance Division and Information Technology Services (ITS) Division, though, had done an excellent job of cleaning up the data reported to the Minnesota Department of Children, Families, and Learning (CFL) for PSEO funding. We found that the data reported to CFL had a remarkably high accuracy rating of 99.6%. A similar effort had not been undertaken, however, to ensure the accuracy of data recorded for College in the High School programs or other courses funded through contracts with secondary schools. We found great variability in how this data was recorded in the information systems.

Exhibit 4-4 shows the variances recorded in PSEO full-year equivalent (FYE) counts for the 16 MnSCU colleges and universities with the largest participation in PSEO programs. As the exhibit shows four colleges and universities had error rates of over 40% and four others had error rates over 10%. Contributing causes to these high error rates were the lack of sufficient guidelines and standards for recording data, limited editing of data input, and insufficient monitoring and feedback on recorded data.



Prior to MnSCU implementing the information system known as the Integrated Statewide Record System (ISRS), individual colleges and universities had varying ways for recording information about PSEO students. When ISRS was implemented many colleges and universities were uncertain what information was required to be recorded for PSEO students and how to record it. In some cases, definitions for required codes were unclear. For example, every student must have a valid admission status to register for a course. Exhibit 4-5 lists several valid admission status codes and definitions. Our analysis found in many cases that college and university definitions of PSEO students included only those students funded through CFL. In those cases where the college or university had a College in the High School program, we found PSEO students coded with admission statuses of 11, 22, or 31. Within some of these colleges and universities, we found inconsistent recording of admission status within their own data, either due to a recording error or inconsistent training of staff. Some colleges and universities told us they specifically coded PSEO students with a regular student admission status to avoid showing the PSEO admission status on college and university transcripts.

For the most part, college and universities were able identify data on their PSEO students. Colleges and universities have developed alternative ways to record information about PSEO students by using unique codes within ISRS. In some cases, colleges and universities continued to use existing “shadow system”, such as a Microsoft Excel spreadsheet to record information about PSEO students.

Exhibit 4-5: Examples of Valid Admission Status Codes in ISRS

Code	Description
11	Undergraduate Regular
12	Undergraduate Transfer
21	Post Secondary Enrollment Option Regular
22	Non-PSEO High School Enrollment
31	Undergraduate Unclassified

Source: ISRS documentation

Currently, ISRS has limited edits for ensuring accuracy of data entry and data integrity. Our analysis found many PSEO student records where data elements were missing or the data was incorrectly recorded. The information that was missing or incorrectly entered would have been useful for completing edits on the data to ensure accuracy and consistency. In addition, having complete information enables the system office to analyze data and complete comparisons across MnSCU institutions. For example, we found many student records that did not contain a:

- **Social Security Number** – currently this is the only unique identifier to track a student across MnSCU institutions. This is useful for determining whether PSEO students return to MnSCU institutions. We found that some colleges and universities that participated in College in the High School programs did not consistently obtain this information.
- **High School Information** – in several cases we found that PSEO student records did not contain the name of the high school the student was attending. In other cases, we found that high school information was inaccurately input into the system. Common errors included PSEO students being incorrectly coded to high schools in other states. For example, we saw instances where Melrose, Minnesota High School was coded incorrectly as a “Melrose High School” in Massachusetts, and New Mexico. Also, the coding of home schooled students was inconsistent.
- **High School Graduation Date** – this information is useful for determining whether the PSEO student is a high school junior or senior. In addition, this information could be used in system edits to ensure consistent coding of other information such as admission status.
- **Birth Date** – this information could also be useful in system edits to ensure consistent coding of other information.

The MnSCU Finance and ITS divisions implemented some changes within ISRS in the 2000 – 2001 school year, as part of an effort to clean up PSEO data reported to CFL. The MnSCU system office submits an electronic file to CFL for fall and spring semester PSEO students funded by CFL. CFL completes a number of edits on this file prior to paying MnSCU colleges and universities for the PSEO credits. Some CFL edits include reviewing or comparing specific data elements against CFL data, for example the following data elements have edits: social security number, high school graduation date,

high school information, and birth date. Many changes added to the ISRS system in the past year have forced colleges and universities to record the information needed by CFL. In addition, the system produces an error report letting the colleges and universities know what students have incomplete data. MnSCU Finance and the ITS division have asked the institutions to also record complete data for College in the High School students. However, these divisions do not complete a review of this data.

MnSCU system office employees who work with data in MnSCU information systems have had difficulty with consistency of data across colleges and universities. In an effort to start addressing some of the consistency issues a student data integrity group was formed recently. The group is comprised of representatives from the system office and MnSCU colleges and universities. The purpose of this group is to identify problems with the integrity, consistency, and completeness of MnSCU student data and make recommendations for improvement.

To be successful, the student data integrity group needs to find resolution to two primary issues. First, it must be granted sufficient authority to ensure that recommendations are implemented and second it must have a mechanism for getting recommendations into the development process within the ITS division. Many recommendations may require ISRS changes or enhancements.

In addition to student data issues, we found inconsistent recording of PSEO financial information within the MnSCU Accounts Receivable (AR) system. By not recording accounts receivable information accurately, users are unable to rely on financial reports produced by the system.

Typically when a student registers for a course tuition and fees are charged and the student is sent an invoice for the charges. However, PSEO students cannot be charged for tuition, fees and many other costs. Colleges and universities have different processes for handling PSEO student charges. Several colleges and universities place a unique code on the PSEO student's account so that an invoice is not generated. Others treat PSEO as a form of financial aid and use that process. A few colleges manually pull PSEO student invoices so that they are not mailed to students.

Colleges and universities also use inconsistent practices for recording receivable information in the AR system for amounts owed by school districts and CFL for PSEO student costs. Some colleges and universities record receivables in the AR system while others do not. In addition, some colleges and universities use the AR system for generating invoices to school districts for students that participate in the College in the High School program or other PSEO contracts. However, several institutions still manually produce or use other systems to produce these invoices.

Recommendations

- *The MnSCU system office should lead efforts to develop data integrity standards and guidance for recording PSEO data. Possible improvements include:*
 - ✓ *Ensuring the student data integrity group has the proper authority to oversee the quality of student data and set priorities for improvements.*
 - ✓ *Create program edits to ensure that critical data is recorded and meets predetermined parameters.*
 - ✓ *Establish standard coding requirements for student and financial data.*
 - ✓ *Develop training and guidance for important users of student data, such as registrars and admissions officers.*
 - ✓ *Develop training and procedures for business office staff to ensure consistent use of the Accounts Receivable systems.*

9. Additional steps are needed to ensure that there is compliance with the State Government Data Practices Act when PSEO student data is distributed to parents and secondary schools.

We found that MnSCU colleges and universities had diverse practices when distributing student information to parents and secondary school administrators. Many colleges and universities were reluctant to provide student information to parents. Some colleges required students to sign release forms in order to share information with parents. Most colleges and universities felt obligated to share PSEO student information with secondary schools.

Because of these diverse practices, we obtained an advisory memorandum from the Office of General Counsel which concludes:

Any student in attendance at a MnSCU college or university has the right to control access to his or her non-directory data – irrespective of age or whether attending full time or part time. Students must give written “informed consent” for disclosure of their non-directory data unless disclosure fits one of the exceptions stated in FERPA¹³ regulations.

Parents of a dependent student may have access to non-directory data without consent, to the extent the college or university has a policy allowing such access.

¹³ FERPA is the Federal Education Records Privacy Act. General Counsel acknowledges that there are differences between the Minnesota State Government Data Practices Act and FERPA. It advises, however, that “as post-secondary institutions, we recognize the importance of protecting the students’ privacy rights and so, we are advising our campuses to simply follow FERPA.”

Post-secondary institutions may also release non-directory data to other schools where the student is in attendance, including high schools, without consent if it has a policy, and meets the other stated conditions concerning the student's rights regarding their data. Exceptions are narrowly construed by the Department of Education; seek legal advice if you have questions about how the exceptions may apply.

Students cannot be required to waive their privacy rights. A college or university may, however, request students to consent to disclosures of data so long as the consent is written, provides specific information about the new use and access to the data, is signed by the student, and is clearly voluntary.

We believe that it is important that parents and secondary schools have appropriate access to information about the academic progress of PSEO students. Accordingly, MnSCU colleges and universities should have a policy of sharing academic data with the secondary schools that their PSEO students are simultaneously attending. Also, colleges and universities could adopt a policy to allow the parents of dependent students (which would include most PSEO students) access to academic data. Without such a policy, colleges and universities could direct parents of PSEO students to the child's secondary school to request access to data held there, including data sent from the college or university.

Recommendation

- *MnSCU colleges and universities should modify their internal policies, as necessary, so that PSEO student data may be shared with parents and secondary schools to the extent permitted by state and federal privacy laws.*

10. The communication and availability of information about PSEO opportunities could be improved.

In its 1996 report, the Legislative Auditor found that "Student participants, their parents, and school administrators generally agreed that there was a need for better information about the Postsecondary Enrollment Options program." Our discussion with student representatives suggests that the need for better program information continues to exist. Some students were surprised to learn that they could have attended college on a full-time basis as a PSEO student. Other students were not aware that College in the High School programs existed.

State law presently requires secondary schools to inform sophomores and juniors about the program by March 1 of each year. As shown in Exhibit 4-6, however, about 65% of MnSCU administrators doubted that secondary staff encouraged students to participate in on-campus programs. Most college and university administrators also were reluctant to market their PSEO programs, fearing that their actions would damage relationships with secondary schools. As a result, much of the program information is disseminated by

“word of mouth”. Although, we found that student representatives generally were aware of the program, they did not have a complete understanding of it.

The University of Minnesota, Twin Cities campus has an excellent web site on opportunities for high school students to earn college credits (See <http://www.cce.umn.edu/pdm/phssmain.shtml>). Also, the State of Wisconsin had a very informative web site on its “Youth Options” program, including a downloadable brochure (See <http://www.dpi.state.wi.us/dpi/dlsis/edop/youthop1.html>). The Minnesota Department of Children, Families, and Learning has some information available on-line about the PSEO program (See <http://cfl.state.mn.us/LOD/PSEO/index.html>). The CFL web site, though, is difficult to locate and has no information on College in the High School programs. A few MnSCU colleges and universities have some PSEO information available on-line. For example, Southwest State University has information on its Challenge Program (See http://www.southwest.msus.edu/distance_education/dist_ed_view.cfm?id=8).

Ideally, MnSCU could work with CFL to develop comprehensive information on all options for Minnesota high school students to earn college credits. Ideally, the information could be targeted to students, parents, administrators, and teachers, as appropriate. Individual colleges and universities could then link to this common information and add information unique to their programs.

Recommendation

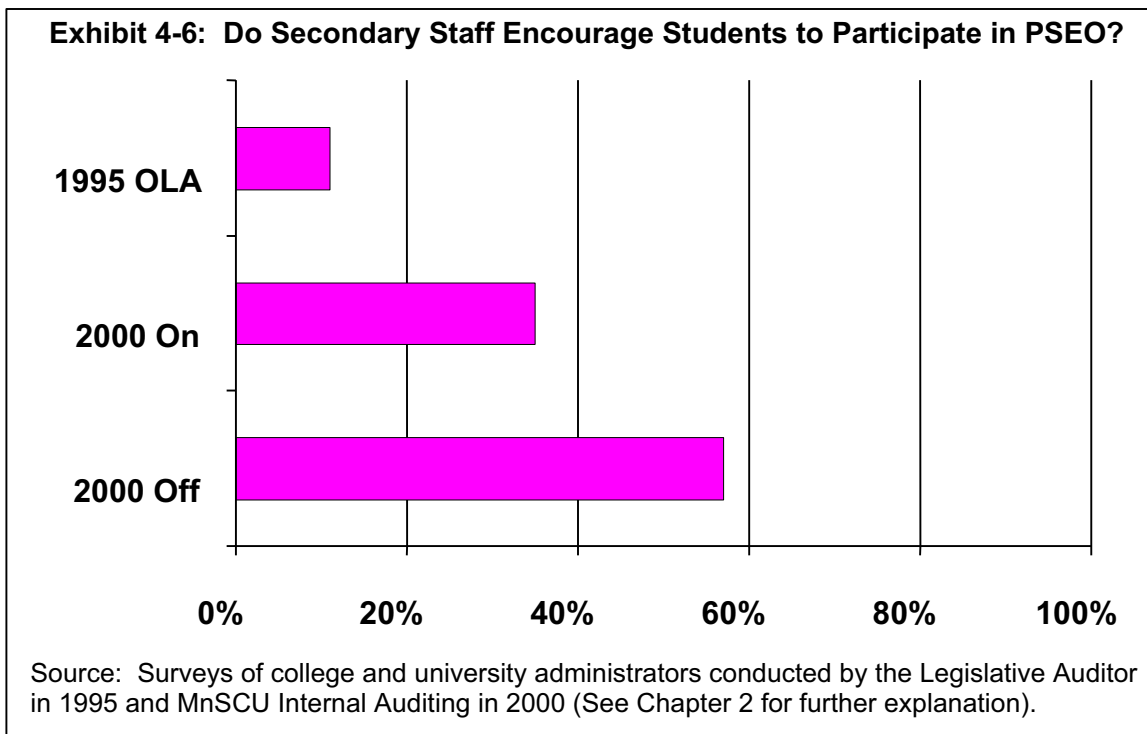
- *MnSCU should work with the Minnesota Department of Children, Families, and Learning to develop informational materials, including web sites, about the options available for high school students to earn college credits.*

11. Some barriers and disincentives remain for high school students interested in participating in the PSEO program.

Many college and university administrators expressed concern about potential barriers and disincentives that secondary school administrators created for high school students wishing to participate in PSEO. Exhibits 4-6 and 4-7 shows how PSEO administrators responded to two survey questions about the role that secondary staff played in PSEO.

Although Exhibit 4-6 shows that PSEO administrators saw some improvement in efforts by secondary staff to encourage PSEO participation, the perceived support for on-campus PSEO programs was still dismal (only about 35%). Interestingly, Exhibit 4-7 shows that any support that post-secondary administrators had for secondary staff to exercise more control over PSEO had essentially evaporated by 2000.

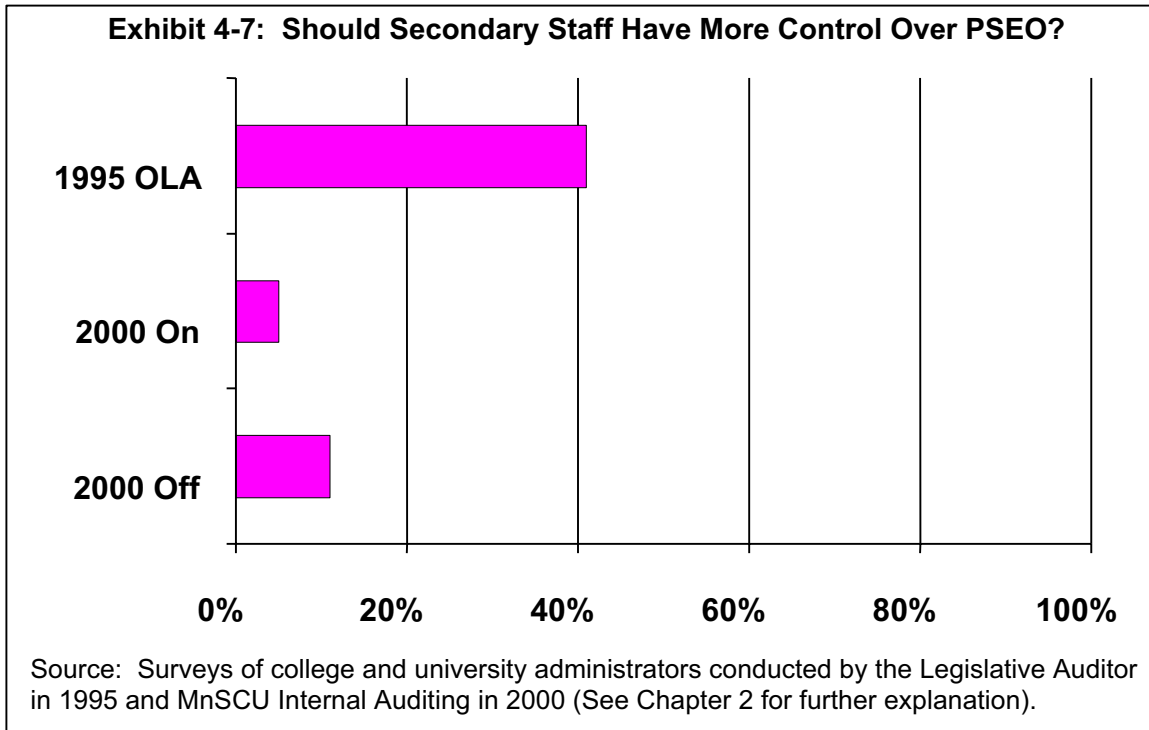
Post-secondary administrators were very sensitive, though, to a dilemma they faced on maintaining relationships with secondary school administrators. On the one hand, colleges and universities needed to develop positive, working relationships with secondary schools so that high school students would be counseled to consider their post-



secondary programs. On the other hand, college and university administrators were sympathetic to the challenges that high school students faced in convincing secondary school administrators that PSEO was an attractive alternative. Although state law does empower high school students to pursue PSEO courses without the approval of secondary school administrators, in reality high school students often find it difficult to challenge the authority of these administrators. We were provided with many anecdotal examples of how secondary school administrators had discouraged PSEO participation. In addition to concerns about poor PSEO information (see Finding 10), some of the more prevalent examples included:

Scheduling difficulties. Differences in the school calendars of colleges, universities and high schools often made it very difficult for high school students to coordinate their class schedules. One college administrator noted that local high school students were required to miss two high school hours in order to attend one college course. Some college administrators speculated that high school schedules were designed to discourage PSEO participation. This may have lead to high school students choosing to attend college courses full-time.

Grading differences. Some college administrators cited examples where high schools would not incorporate PSEO grades into high school class ranks. In other cases, college administrators had found that PSEO students were disadvantaged by high school ranking systems that rewarded students for taking honors classes in the high school, but not PSEO courses.



Another barrier that was commonly identified, but not within the control of secondary schools, was transportation. PSEO students are required to find and finance their own means of transportation when attending courses at college and university campuses.

Also, many colleges and universities expressed concern about how implementation of the “Profile of Learning” and new high school graduation standards would affect PSEO. MnSCU has been working with CFL to accommodate PSEO courses in the Profile of Learning law. Minn. Stat. Section 120B.031 includes the following applicable provisions:

Subd. 4. Rigorous course of study; waiver. (a) Upon receiving a student's application approved by the student's parent or guardian, and with the recommendation of the student's teacher, a school district, area learning center, or charter school must declare that a student has completed a content standard if the local school board, the school board of the school district in which the area learning center is located, or charter school board of directors determines that:

(1) the student is participating in a course of study including an advanced placement or international baccalaureate course or a learning opportunity outside the curriculum of the district, area learning center, or charter school that is equally or more rigorous than the content standard required by the district, area learning center, or charter school or the state graduation rule; and

(2) achieving the content standard to be waived would preclude the student from participating in the rigorous course of study or learning opportunity.

(b) A student who satisfactorily completes a post-secondary enrollment options course or program under section 124D.09, that has been approved under paragraph (c), is not required to complete other requirements of the content standards corresponding to that specific rigorous course of study.

(c) By August 15, 2002, and each year thereafter, the board of regents of the University of Minnesota, the board of trustees of the Minnesota state colleges and universities, and the governing boards of Minnesota private colleges shall determine the courses offered at each post-secondary institution under the post-secondary enrollment options program that meet the requirements of paragraph (a) and shall notify the commissioner of those courses offered that meet the requirements. The commissioner shall make available a listing of the post-secondary enrollment options courses offered at post-secondary institutions meeting the requirements of this section.

(d) Notwithstanding paragraph (a) or (b), a student who entered ninth grade before the 2001-2002 school year and satisfactorily completes an advanced placement or international baccalaureate course, or a post-secondary enrollment options course under section 124D.09, satisfies the requirements of the content standards corresponding to that specific rigorous course of study.

In 1996, the Legislative Auditor recommended that “Secondary and postsecondary schools should better coordinate their efforts and direct individual students to the most appropriate schools and courses for them.” That recommendation continues to make sense today.

Recommendations

- *The system office should work with the Minnesota Department of Children, Families, and Learning and the Minnesota Alliance for Education¹⁴ to alleviate existing barriers to PSEO participation, such as scheduling conflicts and grading disincentives.*
- *The system office should continue efforts with the Minnesota Department of Children, Families, and Learning to devise a means to articulate PSEO coursework to new state graduation standards.*

¹⁴ The Alliance includes representatives from Education Minnesota, Minnesota Department of Children, Families, and Learning, SciMath Minnesota, Minnesota Parent and Teachers Association, Minnesota Association of School Administrators, Minnesota Association of Secondary School Principals, Minnesota Elementary School Principals, Minnesota School Boards Association, Minnesota Rural Education Association, Minnesota Association for Teacher Education, Minnesota Association of Teacher Educators, Minnesota Association for Supervision and Curriculum Development, Richard Green Institute, Minnesota Minority Education Partnership, Association of Metropolitan School Districts, and the Coalition of Minnesota Presidents of Educational Associations.

12. Periodic feedback from students, parents, and secondary schools to assess their satisfaction with PSEO programs is needed to inform continuous improvement efforts.

Most colleges and universities told us that they had not obtained any specific feedback from PSEO students or parents about their experience. Fergus Falls Community College and Riverland Community College had, however, conducted recent surveys of PSEO students. The surveys both found a high degree of satisfaction with the program.

We found no instances, however, where MnSCU colleges and universities had sought any systematic feedback from parents of PSEO students or secondary school administrators. Feedback of this nature would be valuable information to institute continuous improvement efforts and ensure program quality.

Recommendation

- *As a continuous improvement tool, colleges and universities should consider periodic surveys or assessments of student, parent, and secondary school satisfaction with PSEO programs.*

CHAPTER 5

Possible Program Expansions

Despite its very impressive reach across the State of Minnesota, there are additional opportunities to expand the availability of earning college credits to high school students. In particular, the program has had difficulty extending college-level technical education opportunities to high school students. Further expansion opportunities include reaching out to students who cannot succeed in the high school environment. Colleges and universities also could consider expanding programs through the use of technology. Caution is needed, however, to ensure that program quality is preserved for any expansion efforts.

As shown in Chapter 2, MnSCU PSEO programs reach virtually every Minnesota high school. The combination of on-campus and College in the High School programs make college credits very accessible to high school students. Despite this success, there are some opportunities to expand access to the program. Any expansion, however, must be done carefully to ensure that program quality is not compromised.

13. Participation in college-level technical education programs by high school students remains limited.

Although about 40% of MnSCU lower division credits are in technical education programs, only about 20% of the PSEO credits were in technical education areas. This statistic indicates that a disproportionate amount of PSEO activity is in liberal arts and transfer program. It is also ironic that MnSCU policy does not establish any minimum standard for admitting high school students to technical college programs.¹⁵ Furthermore, it is our understanding that the availability of technical education programs at secondary schools is becoming more limited due to funding cutbacks and the difficulty of finding qualified instructors.

It is also interesting to note that there are several other alternative programs for high school students to earn college-level technical education credits. Most of these other programs, however, lack some of the advantages offered by PSEO programs. An example is the Tech Prep program offered under the federally funded Perkins Grant program.

The focus of Tech Prep is to assure that all students, but especially the “neglected majority” have the opportunity to prepare for high tech, high wage occupations by providing two years (grades 9 and 10) of high school education and two years of college technical occupational education. As a result, 2+2 Tech Prep Articulation Agreements are developed between secondary and post-secondary institutions. When courses within the high school preparation qualify for college credit, high schools and colleges,

¹⁵ Board policy 3.5 does, however, set a standard for admitting high school juniors (top third of their class) and seniors (top half of their class) into community college and state university programs.

following state Tech Prep guidelines for development and review, negotiate an advanced standing supplement to the articulation agreement to govern the program curriculum and delivery. The advanced standing agreement typically allows the students that show satisfactory completion of the course to apply the credits toward a technical education program at the sponsoring college. The disadvantage arises when documenting the earning of credit. Most often, the high school provides successful students with a certificate as evidence of successful completion of the course. Certificates usually must be redeemed at participating colleges within a set time period that currently varies from 18 months to three years after high school graduation. Certificates may or may not be redeemed at other colleges. Unlike the Minnesota transfer curriculum, which is recognized statewide, similar technical courses and programs vary in scope and sequence. It is therefore, the receiving institution who determines whether the credit earned will be accepted.

Certificates are an awkward option to recording credits on a transcript. Students may lose certificates or forget about them. Also, there are very limited opportunities for Tech Prep credits to transfer between colleges. Lake Superior College has begun efforts to record its Tech Prep credits on the college transcript. Students are required to demonstrate academic achievement to the college, however, in order for the credits to be recorded. This effort seems consistent with a provision in board policy that encourages colleges and universities to develop creative methods for awarding college credits.

The system office is also working with the Minnesota Department of Children, Families, and Learning to catalogue existing Tech Prep articulation agreements. Because the MnSCU registration system does not capture data on articulation agreements, however, an alternative information system must be developed.

There is an opportunity to expand the effectiveness of the Tech Prep program. Changes could negate the need for an alternative information system and ease the documentation of credits earned. Several MnSCU technical colleges currently offer College in the High School programs taught by college faculty. Only limited use of high school teachers working under college mentors exists in technical programs.

Other options to consider for expanding technical education opportunities include the “Middle College” concept being developed at Anoka-Hennepin Technical College and the Options program offered through the State of Wisconsin.

Finally, it should be noted that one provision of state law creates a barrier for some students to take technical education credits through the PSEO program. State law prohibits students enrolled in the three metro area Intermediate School Districts from registering as PSEO students. Instead, these students must rely on their districts to negotiate joint powers agreements with their affiliated colleges¹⁶. Although the Intermediate School Districts were created to expand technical education opportunities for high school students, its may have an opposite effect in that it limits their student

¹⁶ State law stipulates that Hennepin Technical College, Dakota County Technical College, and Century College have relationships with Intermediate School Districts.

choice rights. Furthermore, the three affiliated colleges must negotiate funding arrangements without having the leverage of available CFL funding. We found that few Intermediate School District students earned college credits through this program.

Recommendations

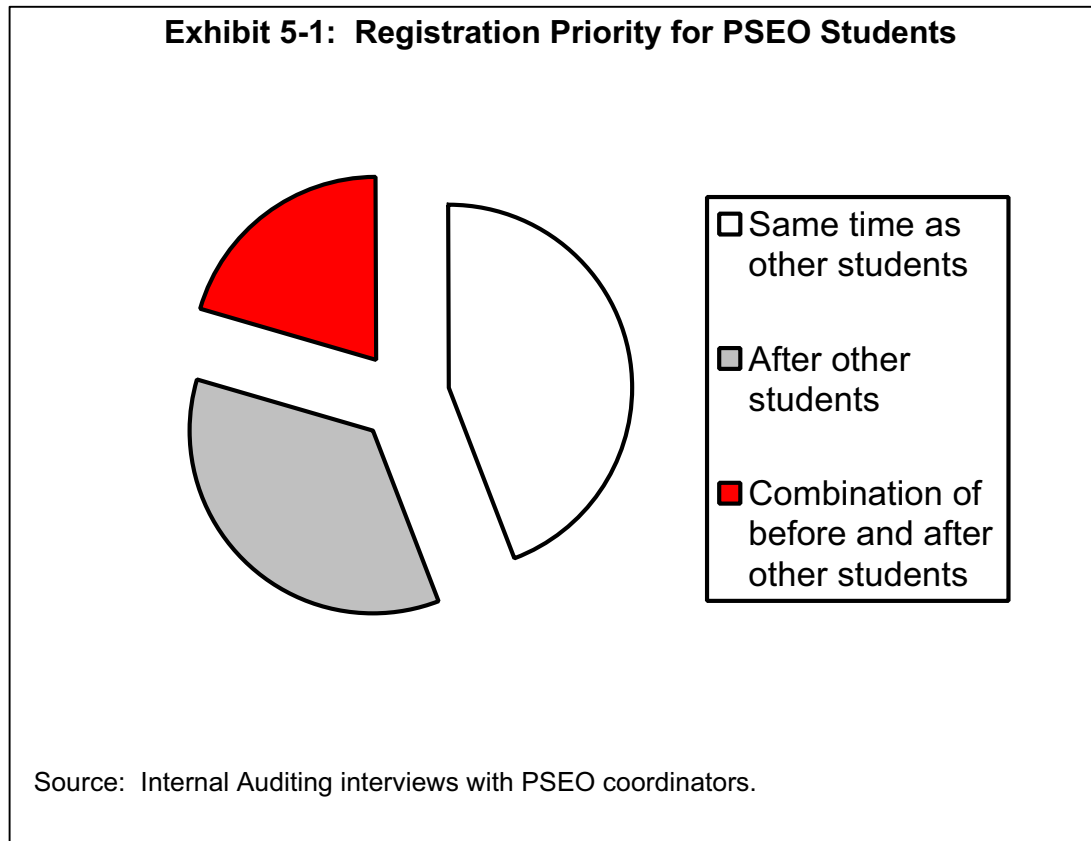
- *Explore options to convert existing Tech Prep programs into a structure that is more similar to College in the High School programs.*
- *Consider pursuing a legislative change to provide Intermediate School District students with the same options as other high school students for taking technical education college credits.*
- *The Anoka-Hennepin Middle College model should be monitored for its potential application to other MnSCU colleges and universities.*

14. The legal requirement that PSEO students be enrolled on a “space available” basis is confusing and inconsistently administered.

Minnesota Statute Section 124D.09 Subd. 9 states that post-secondary institutions shall give priority to post-secondary students when enrolling PSEO students. MnSCU Board Policy 3.5 Part 2 reiterates this law by stating that PSEO students shall enroll on the basis of available space or other appropriate defined local standards or procedures. PSEO enrollment may be controlled either by restricting admissions or limiting registration priorities.

As shown in Exhibit 5-1, fifteen MnSCU colleges and universities allow PSEO students to register at about the same time as other post secondary students. One reason given for this practice was that “registration needs to be done early enough so that high school counselors are still available.” Returning PSEO students are generally treated as regular post secondary students and register based on the number of credits earned. Twelve colleges and universities register PSEO students after post-secondary students have registered. Registration times appear to be directly related to whether a college or university has seating capacity and in essence complies with the “space available” law and board policy.

The “space available” standard results in limited access for PSEO students to MnSCU colleges and universities and educational programs that typically have their capacity exhausted by post-secondary students. For example, Winona State University fills its admissions quota early each year with incoming high school graduates and leaves few registration options for PSEO students. Some technical colleges have open admission policies for PSEO students, but may have already filled available slots for popular programs. Certain technical education programs are in high demand and maintain waiting lists of student applicants; again leaving little room for PSEO students.



The University of Minnesota, Twin Cities campus¹⁷, has decided to limit PSEO admissions to improve the students ability to register for courses of their choice. Each year it reserves 550 admissions slots for PSEO students. The University of Minnesota reports that it receives twice as many applications as there are slots available. As a result, it accepts only the best qualified candidates who in turn have a very high achievement rate in the program.

MnSCU consolidated colleges face a unique challenge when registering students. The board policy on PSEO does not establish an admissions standard for technical education programs, but it does for community colleges. Several consolidated colleges, thus, allow students that do not meet the community college admissions standard to register for technical education courses. The MnSCU student registration system is not designed to allow students to register for only some courses (technical education) and not others (liberal arts). Accordingly, consolidated colleges often depend on manual procedures, such as a required sign-off from a college counselor prior to registration. We saw evidence at one of the consolidated colleges where students admitted for technical programs were able to bypass the registration controls and enroll in liberal arts courses.

¹⁷ It should be noted that the University of Minnesota is also subject to the “space available” law for PSEO students.

Recommendations

- *MnSCU Academic Affairs should consider adopting procedures and guidelines that interpret the “space available” provision. The interpretation should address whether an option such as the University of Minnesota practice of admitting a limited number of students into popular programs would be allowed.*
- *MnSCU consolidated colleges must adopt special procedures to ensure that students admitted for only certain courses, such as technical programs, are not allowed to register for other courses, without meeting the minimum required standards.*

15. Opportunities to use PSEO programs to reach students who cannot succeed in traditional high school environments should be explored.

The Minnesota Legislature has recognized that there are students who do not fit into the traditional high school setting. For many reasons these students have had or are having “trouble” in the traditional setting. Whether it be emotional problems, truancy, English as a second language, unplanned parenthood or any other reason these students are at risk. These students face a high risk of becoming high school drop-outs. To address the special challenges faced by these students, the Legislature has enacted Minnesota Statute Section 124D.68, the Graduation Incentives Program. It defines the program purpose as follows:

The legislature finds that it is critical to provide options for children to succeed in school. Therefore, the purpose of this section is to provide incentives for and encourage all Minnesota students who have experienced or are experiencing difficulty in the traditional education system to enroll in alternative programs.

The legislation lists the PSEO program as one of the options for these at-risk students.

MnSCU board policy on admissions, however, effectively eliminates many at risk students from consideration for enrollment in the PSEO program. Although students can appeal the class ranking admission requirement, at-risk students may be unlikely candidates to prevail in an appeal. If PSEO programs are to be expanded to include at-risk students, a different standard would be needed for considering for admissions. It might include consideration of a student's maturity and motivation for handling college level coursework. Also, it would be essential to establish a very rigorous counseling program and stringent academic progress monitoring process for at-risk students. Caution is needed to preserve the quality of academic programming and a productive learning environment. Also, it should be anticipated that it will be more costly to educate at-risk students, so financial consideration must be weighed.

South Central Technical College does have a process to contract with high schools for at-risk students. A high school counselor or a post-secondary team must refer a student to the program. Although the high school must pay for these students' tuition and fees, it is able to retain state funding that would be lost if the student dropped out of high school.

The student is required to meet with student services to monitor academic progress and may lose eligibility for poor performance.

Recommendations

- *Consideration should be given to developing a program that reaches at risk high school students as envisioned by Minn. Stat. Section 124D.68.*

16. Use of technology to expand the availability of college-level programs to PSEO students should be explored.

The use of technology for delivering college-level programs to high school students holds great promise. Several colleges and universities have experience with interactive television (ITV) to deliver PSEO courses. ITV technology allows college faculty to teach PSEO courses in several locations simultaneously and permits students to remain in their high schools when receiving the instruction. It usually requires on-site supervision, however, and must be scheduled around the availability of available broadcast schedules.

Another emerging form of using technology for course delivery is internet-based courses. These courses offer the same advantages of ITV delivered courses and offer more scheduling flexibility. Unique, but not insurmountable, challenges are presented, though, in supervising student academic progress. The Lake Superior College (LSC) "Honors On-Line" is an example of a program that successfully has met many of the challenges of on-line course delivery. The program is taught by LSC faculty and delivered to nine northeast Minnesota high schools via the Internet. Because of the proximity of participating high schools, faculty instructors also generally try to meet with the students enrolling in the program. On-line tutoring is available for participating students. Like all LSC students, "Honors On-Line" students receive an 'Academic Alert' if their grades are falling below a specified level. One challenge not yet solved by the college is how to conduct college readiness assessment testing for interested students.

Again, though, caution is needed before expanding on-line opportunities too rapidly. One Chief Academic Officer told us that the failure rate for some on-line courses is around 50% because it requires greater discipline by learners and may not fit the learning styles of many students.

As on-line course delivery options will continue to grow, however, pressuring existing MnSCU PSEO programs, particularly College in the High School programs. MnSCU currently is pursuing various E-Learning options to remain competitive in this environment.

Recommendations

- *Colleges and universities should consider offering on-line courses, like the Lake Superior College "Honors On-Line" program, to PSEO students.*

CHAPTER 6

Fix the Finances

In fiscal year 2000, the State of Minnesota and local school districts invested about \$27 million in supporting high school students who earn college credits at MnSCU colleges and universities. We estimate that this investment returned savings of over \$45 million to Minnesota taxpayers, parents, students, and the federal government. The State of Minnesota alone is saving about \$7 million on these students. Despite these state-level savings, MnSCU is required to absorb an estimated loss of about \$6.3 million for sponsoring PSEO programs. MnSCU shields individual colleges and universities from recognizing this loss, however, the current MnSCU allocation model rewards individual colleges and universities for participation in PSEO.

From a public policy perspective, financing PSEO coursework is a complicated matter. For students and parents, however, PSEO financing is quite simple because state law prohibits charging students for tuition, most fees, and books. Public financing for the program comes from a combination of payments from the Minnesota Department of Children, Families, and Learning or local school districts and partial legislative funding. If students take full advantage of PSEO credits earned, they graduate from college sooner, resulting in lowered costs of public education. For example, if prior to high school graduation, a student has earned a year worth of college credits, that student may be able to earn a bachelor's degree in three more years.

We found several concerns with the present financial structure for the program. There is a misalignment between public financing policy and the current MnSCU allocation model. Also, the allocation model does not distinguish funding for lower cost off-campus programs from on-campus programs. The public policy benefits of PSEO programs, though, justify careful consideration so that financial disincentives do not diminish access to the program. We noted other issues with inconsistent contract pricing and difficulties interpreting how to apply the state pupil fee law.

- 17. The net financial benefit of the PSEO program has not been widely recognized. In fiscal year 2000, the state and secondary school districts invested a combined \$27 million in MnSCU PSEO programs. This investment generated estimated savings of over \$45 million for state government, the federal government, parents, and students.**

Legislative funding for secondary and post-secondary education is a very complex matter. The financial implications of the PSEO program at MnSCU are shown in the table in Exhibit 6-1.

The exhibit shows that the PSEO program saved students and parents an estimated \$11.7 on college tuition, fees, and books.¹⁸ State law prohibits post-secondary institutions from advertising the financial benefits of the PSEO program and we found MnSCU colleges and universities complying with this requirement. Our interviews suggest, though, that parents have become aware of these financial benefits over time.

Exhibit 6-1: Financial Implications of PSEO at MnSCU

State Impact	Resources Paid to MnSCU		Savings Realized by Others	
	<ul style="list-style-type: none"> CFL Payments State Appropriation 	<p>\$13,412,191</p> <p>11,459,802</p>	<ul style="list-style-type: none"> State Aids Withheld Future State Appropriation Foregone (2) State Grant Savings 	<p>\$19,680,833</p> <p>11,001,410</p> <p>1,168,069</p>
	State Costs	\$24,871,993	State Savings	\$31,850,312
Other Impacts (1)	<ul style="list-style-type: none"> School District Contracts 	2,500,000	<ul style="list-style-type: none"> Parent & Student Savings Federal Pell Grant Savings 	<p>11,773,089</p> <p>2,001,452</p>
	TOTAL COSTS	\$27,371,993	TOTAL BENEFITS	\$45,624,853

- (1) This table does not show resources that school districts continue to receive for their students that participate in PSEO, such as local tax levies and residual amounts of state aids.
- (2) The future state appropriation savings is a conservative amount of state savings. It represents only the savings accrued for high school graduates that enroll in MnSCU colleges and universities with PSEO credits previously earned at a MnSCU college or university (an estimated 48% of PSEO credits earned at MnSCU). Additional savings would be achieved for MnSCU PSEO credits that transfer to the University of Minnesota.

Source: Internal Auditing estimates based on information from MnSCU and CFL.

According to state law, CFL withheld most secondary school aids (88%) for public school students that attend PSEO courses financed through the Minnesota Department of Children, Families, and Learning (CFL). Secondary schools avoid losing state aids, however, if they execute contracts for direct payments to post-secondary schools (Finding 19 discusses contract payments in more detail). In fiscal year 2000, with assistance from

¹⁸ The estimate of family savings is shown net of student financial aid savings discussed later in this Finding.

CFL, we estimate that \$19 million¹⁹ in state aids were withheld from Minnesota high schools, as a result of public high school students taking PSEO courses.

CFL pays post-secondary schools a standard amount per credit (\$142.62 in fiscal year 2000), unless a post-secondary school has executed a contract to receive direct payments from a secondary school for particular course credits. It is important to note that the formula for CFL payments to post-secondary schools is independent from the formula for withholding state aids from secondary schools. Also, CFL will pay for non-public school students, e.g. private high school students and home school students, that attend any eligible Minnesota college or university under the PSEO program. Payment is not based on the cost of tuition, fees, and books. Thus, the same payment is made to four-year universities which are generally more costly to attend than two-year colleges. In fiscal year 2000, CFL paid \$13 million to MnSCU colleges and universities for students taking PSEO courses.

The Legislature provides MnSCU with 50% funding for credits taken by PSEO students or an estimated \$11.5 million in fiscal year 2000. Retention statistics²⁰ show that about 48% of these PSEO students enroll in a MnSCU college or university immediately following high school graduation. The Legislature provides full funding for the credits earned by these students after high school graduation. Thus, for only the students retained by MnSCU, there is an estimated future savings in state appropriations of \$11 million.²¹

Finally, it should be noted that PSEO students are not eligible for state and federal student financial aid programs. The MnSCU Director of Student Financial Aid provided us with estimated federal Pell grant²² amounts and state grant²³ amounts for an average MnSCU student. Using that information, we estimated that the federal government saved about \$2 million and the state government saved about \$1.2 million due to the MnSCU PSEO programs.

Recommendation

- *MnSCU officials should periodically measure the financial impact of the PSEO program and use the information to demonstrate the program's value to state and federal officials.*

¹⁹ CFL ran a special program for us to calculate the amount of secondary school aids not paid to school districts as a result of high school students taking CFL-funded PSEO courses. Its calculation showed state aids of \$24,101,220 being withheld. MnSCU represented about 82% of the CFL-funded PSEO credits, so we estimated that a comparable share of the state aids withheld were attributable to MnSCU.

²⁰ See Exhibit 2-14 in Chapter 2.

²¹ The estimated savings would increase for any students transferring credits to the University of Minnesota or returning to a MnSCU college or university in later academic terms.

²² Approximately 27% of MnSCU students receive federal Pell grant awards, averaging \$1,556 per year.

²³ Approximately 22% of MnSCU students receive state grant awards, averaging \$1,115 per year.

18. The current allocation formula provides financial incentives for MnSCU colleges and universities to offer PSEO programs, but results in an estimated financial loss of \$6.3 million for the entire MnSCU system.

The misalignment between the MnSCU allocation formula and public financing policy results in local financial incentives to offer PSEO programs, but creates a system-wide loss for MnSCU. Based on our analysis of program profits and losses, we estimate that the MnSCU system collectively lost about \$6.3 million²⁴ on PSEO programs. Our calculation of this loss is based on the composite profit and loss estimates shown in Exhibit 6-2 for on-campus PSEO programs and Exhibit 6-3 for off-campus PSEO programs. The exhibits show a composite profit and loss experience based on detailed analysis of five MnSCU colleges and universities. This experience varies between individual colleges and universities and between institution types. For example, two-year colleges generally fare better than four-year universities with CFL funding for on-campus programs. On average, the cost of tuition, fees, and books for a four-year university was close to the \$142.62 of funding provided by CFL. Those costs, on average, were markedly lower for two-year colleges.

**Exhibit 6-2: On-Campus PSEO Programs
Composite Profit & Loss Statement Per FYE**

	Campus View	MnSCU View
Revenues:		
Appropriation	\$4,122	\$2,061
CFL Payment	4,279	4,279
Total Revenues	\$8,401	\$6,340
Expenses		
Direct Costs	\$4,420	\$4,420
Indirect Costs	3,505	3,505
Total Expenses	\$7,925	\$7,925
Net Profit (Loss)	\$476	(\$1,585)

Source: Internal Auditing calculations based on FY 2000 Cost Study prepared by MnSCU Finance and information obtained from five MnSCU colleges and universities.

²⁴ The loss estimate was calculated by multiplying the estimated MnSCU loss of \$1,585 per FYE shown in Exhibit 6-2 by the 3,552 FYE of on-campus PSEO delivered in fiscal year 2000, and adding the estimated MnSCU loss of \$567 per FYE shown in Exhibit 6-3 by the 1,211 FYE of off-campus PSEO for the year.

As shown in Exhibits 6-2 and 6-3, the financial analyses show that from a college or university perspective (Campus View) PSEO programs generate a profit. From a system perspective (MnSCU View), however, the programs generate a loss. The difference is that the Legislature provides the system with only a 50% share of funding for PSEO students, while the current allocation model provides 100% funding for PSEO students. In essence, the PSEO program is being subsidized by about \$6.3 million from other sources internal to MnSCU. For comparative purposes, Exhibit 6-4 shows that these same five colleges and universities essentially broke even financially for non-PSEO students measured both from a campus and MnSCU perspective.

**Exhibit 6-3: Off-Campus PSEO Programs
Composite Profit & Loss Statement Per FYE**

	Campus View	MnSCU View
Revenues:		
Appropriation	\$4,122	\$2,061
Contract Fee	896	896
Total Revenues	\$5,018	\$2,957
Expenses		
Direct Costs	\$852	\$852
Indirect Costs	2,672	2,672
Total Expenses	\$3,524	\$3,524
Net Profit (Loss)	\$1,494	(\$567)

Source: Internal Auditing calculations based on FY 2000 Cost Study prepared by MnSCU Finance and information obtained from five MnSCU colleges and universities.

It may be tempting to align the MnSCU allocation model with public finance policy of only 50% funding for PSEO students. This change, however, may cause MnSCU colleges and universities to curtail PSEO access. Thus, the financial advantages of any change should be weighed against the public relations and political costs associated with reducing access to a very popular program. Also, as discussed in Finding 17, the state alone saves about \$7 million due to MnSCU PSEO programs. It may be possible to convince the Legislature that those savings should be reinvested in MnSCU so that its PSEO programs are fully funded.

Finally, the MnSCU Budget Unit should consider expanding its annual cost study to differentiate the costs of on-campus and off-campus programs. In Exhibits 6-2 and 6-3, we have made certain assumptions to recalculate the direct and indirect costs associated

**Exhibit 6-4: On-Campus College Students (non-PSEO)
Composite Profit & Loss Statement Per FYE**

	Campus View	MnSCU View
Revenues:		
Appropriation	\$4,122	\$4,122
Tuition & Fees	2,738	2,738
Total Revenues	\$6,860	\$6,860
Expenses		
Direct Costs	\$3,362	\$3,362
Indirect Costs	3,505	3,505
Total Expenses	\$6,868	\$6,868
Net Profit (Loss)	(\$8)	(\$8)

Source: Internal Auditing calculations based on FY 2000 Cost Study prepared by MnSCU Finance and information obtained from five MnSCU colleges and universities.

with those programs. As the Exhibits show, the cost for on-campus and off-campus programs is significantly different. That information would be helpful to colleges and universities in assessing the profitability of their various programs.

Recommendations

- *MnSCU should attempt to convince the Legislature to redirect savings that result from the PSEO program to fully fund the cost of MnSCU PSEO programs.*
- *The misalignment between the Legislative funding formula for PSEO and the MnSCU allocation model needs to be addressed. The current allocation method does not distinguish between PSEO students and other college students. The positive value of the PSEO program with parents, students, and legislators should be weighed against the primary obligation to support MnSCU's core mission.*
- *The cost studies should differentiate direct and indirect costs for on-campus and off-campus programs.*

19. Contract pricing for PSEO programs is inconsistent, unduly competitive, and is often based on incomplete information.

In fiscal year 2000, we estimate that MnSCU earned about \$2.5 million²⁵ in contract payments from school districts for PSEO programs. As discussed earlier, secondary schools are able to avoid having CFL withhold any state aid payments for PSEO programming if the school district negotiates a contract to pay a college or university directly for credits earned by their PSEO students. State law permits these contractual arrangements, but provides that MnSCU may charge no more than its costs. As shown, in Finding 18, though, MnSCU colleges and universities collectively are losing money on PSEO contracts. Furthermore, we estimate that MnSCU colleges and universities offer contract PSEO programs at rates that are discounted by over 50%, compared to PSEO funding rates paid by CFL.

MnSCU colleges and universities had diverse practices for pricing PSEO contracts. The pricing structure for College in the High School programs varied widely. The price for College in the High School programs was sometimes set to approximate the cost of assigning a mentor to oversee the course. Also, several two-year colleges continue to follow the guidance of an old Community College policy for pricing College in the High School programs. In some cases, College in the High School programs are priced out on a per student basis, such as \$50 per student. In other cases, a flat fee is negotiated for any course offered in a high school for the year. In one case, a college charged a flat fee of \$1,000 to a high school that generated over 200 PSEO credits. In another case, a college returned most of the contract payment to the high school to reimburse it for the cost of using the high school teacher.

On-campus programs usually either charged the CFL rate or the actual cost of tuition, fees, and books. CFL has advised some school districts that it would be advantageous for them to negotiate contract payments for PSEO, rather than permitting state aids to be withheld so that PSEO financing occurs through CFL. CFL provided us with information showing that 145 of 357 Minnesota school districts²⁶ could realize a financial gain if they contracted with colleges and universities for PSEO payments, rather than allowing the CFL funding formula to be used. Additional school districts could gain financially, if they could convince colleges and universities to accept less money than the CFL funding rate. In many instances, colleges and universities agreed to accept payment for tuition, fees, and books under terms of a contract. From their perspective, they were seeing the same financial results as for regular post-secondary students. However, as shown in

²⁵ As discussed in Finding 8, colleges and universities are not recording PSEO revenues on MnSCU accounting in a consistent manner. Therefore, we estimated contract revenues based on program information obtained from each MnSCU college and university.

²⁶ CFL data showed in fiscal year 2000 that incremental state aid payments to Minnesota school districts ranged from less than \$4,000 to over \$7,000 per pupil. Any school district receiving more than \$4,862 would lose more money than CFL was obligated to pay to a college or university (\$142.62 per credit X 30 credits per FYE, divided by 88% of state aid lost for a PSEO FYE). 145 school districts received more than \$4,862 per pupil and would have benefited financially by contracting directly with colleges and universities.

Finding 18, this strategy in fact results in a financial loss for MnSCU because only a 50% share of legislative funding is received.

The Board of Trustees sets tuition levels for all regular post-secondary students. It does not, however, set any parameters for tuition and fee payments made through third-party financing arrangements, like PSEO contracts with school districts. The varying contract prices have created a fair amount of ill will among MnSCU colleges and universities. Some colleges and universities suspected that certain high schools may be more concerned with financial terms, than program quality. Wide-open contract pricing is not productive for MnSCU, we think some parameters should be set.

Recommendation

- *The MnSCU Finance Division should develop guidelines that establish parameters for contract pricing of PSEO programs.*

20. The State Pupil Fee Law severely limits colleges and universities from charging PSEO students for tuition and fees and may expose colleges and universities to losses for high cost programs.

For the most part we found that MnSCU colleges and universities were very much aware that state law prohibited them from charging any fees to PSEO students. We did find, however, that there was some variation in practices on how to deal with certain high price programs and course materials. We also received questions about whether PSEO students could be charged for use of laptop computers. The following conclusions are based on advice from the Attorney General's Office²⁷.

Minnesota Statutes Section 123B.37 prohibits charging PSEO students for most fees. Prohibited fees include application fees, books, technology fees, mandatory field trips, lab fees, and student association fees. Colleges and universities remain obligated to pay student association fees for PSEO students, but must make the payment out of CFL funding or contract payments and cannot pass the cost onto the students. Also, we found that it was sometimes awkward for secondary schools to collect books back from PSEO students at the end of a semester. State law provides that the school districts own the books. Century College had a rather creative solution to the book problem. It gave school districts the option of allowing the college to collect books from students, sell the used books, and donate the proceeds to the college foundation. The college estimated that it had collected over \$100,000 for its foundation through this program. In addition, Hibbing Community College collects books from PSEO students and resells them on behalf of the high school. The high school uses the proceeds for a scholarship fund.

There are other circumstances under which PSEO students can be charged fees. Permitted fees include parking fees, optional field trips, and items that become the personal property of the student upon completion of the course, such as tools. Although

²⁷ Advice received from Assistant Attorney General Charles T. Mottl, Manager Education Division for the Attorney General's Office.

the law permits charging PSEO students for items such as tools, the cost is often be a barrier for PSEO students enrolling in those courses. Affording expensive tools would be particularly costly for PSEO students who are not eligible for student financial aid.

There are possible alternatives for handling high cost programs. The law implies that colleges and universities have some latitude on deciding which courses are available to PSEO students. Further, it indicates that colleges and universities may decide to offer certain courses only for post-secondary credit. If high school students do not earn both high school and college credit for a course, then the pupil fee law does not apply and students may be charged for course tuition and fees. However, basing course availability strictly on financial implications may prove problematic. Legislative intent is unclear and course restrictions should not be taken to extremes for financial purposes.

Finally, we reviewed the question of charging students for the use of laptop computers. Essentially, if the laptop becomes the property of the student, students may be assessed for its cost. Ownership of the computer is deemed to exist where students are required to buy a computer, and may include arrangements allowing the student to purchase the computer as part of the lease agreement. Students cannot be charged, however, when a student leases a computer and has no option to purchase it.

Recommendation

- *The MnSCU Finance Division should develop guidelines for compliance with the state Pupil Fee Law.*

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Study Objectives
Approved by MnSCU Audit Committee
July 19, 2000

1. Compile Useful Information

- ✓ Inventory PSEO activity generated through each MnSCU institution. Compile information on both PSEO students taking courses at colleges and universities and through contractual agreements with high schools (concurrent enrollment). To the extent possible, gather information on PSEO courses offered through the University of Minnesota and private colleges. How does each institution define the parameters of these programs?
- ✓ Determine the extent to which incoming students bring PSEO credits with them upon enrolling in college.

2. Analyze Goals and Objectives

- ✓ Have PSEO programs allowed colleges and universities to maintain effective relationships with secondary schools? What other college and university activities support secondary schools, such as charter school sponsorships?
- ✓ How do PSEO credits earned by high school juniors and seniors compare to other alternatives for them earning college credits, e.g., advance placement examinations, international baccalaureate programs, Tech Prep, or direct enrollment?
- ✓ Assess the significant incentives and disincentives to colleges and universities, secondary schools, students and parents participating in PSEO programs.

3. Review Operations

- ✓ What practices have colleges and universities developed for promoting PSEO programs to secondary schools? Assess the competition that exists for executing PSEO contracts with secondary schools.
- ✓ Have colleges and universities implemented effective practices to ensure the quality of PSEO courses taught at high schools by high school teachers?
- ✓ Do colleges and universities have effective methods for assessing the performance of PSEO students? Is there an assessment of whether PSEO students perform to the same “standards to which the institution's non-PSEO students are held accountable”? Do colleges assess the readiness of students prior to admittance into PSEO programs? Have colleges and universities

implemented evaluation components which allow them to assess whether PSEO students are learning what they should be learning?

- ✓ Have colleges and universities accepted PSEO credits earned at other institutions by incoming students (institutions are required to accept PSEO credits that they have granted to incoming students)?

4. Analyze Financial / Enrollment Information

- ✓ What has been the financial impact of PSEO courses on colleges and universities? How do revenue streams compare to those for traditional college students? What fees are and are not charged to PSEO students (institutions are required to adhere to pupil fee rules similar to school districts)? Do PSEO revenues cover costs associated with the programs?
- ✓ Have colleges and universities established reasonable fees for effective methods for determining market prices for their contract courses?

5. Test Legal Compliance

- ✓ Do colleges and universities have procedures in place to ensure compliance with applicable state statutes and MnSCU policies? Important legal and policy provisions include:
 - PSEO students must meet the specified criteria for participation in the program or are allowed to participate only after special appeal by a high school counselor or principal.
 - Colleges and universities must refrain from advertising PSEO programs or recruiting students to participate in the program on financial grounds.
 - PSEO classes provided on-site at Minnesota high schools must truly be discrete. College or university level courses may not simultaneously enroll PSEO and non-PSEO high school students.
 - If colleges or universities select high school teachers to provide PSEO instruction, the college or university must provide a faculty mentor to the high school teacher to ensure that courses are at a collegiate level.
 - If colleges or universities select high school teachers to provide PSEO instruction, the teachers must meet appropriate collegiate or university faculty qualifications.
 - If colleges or universities select high school teachers to provide PSEO instruction, the availability of support services must meet the college or university on-campus standard.
- ✓ Analyze existing statutory and MnSCU policies to determine whether they present barriers to effective program implementation or create unintended negative consequences.

Advanced Placement and International Baccalaureate Programs

Advanced Placement (AP) and International Baccalaureate (IB) are two internationally known programs that offer high school students the ability to complete college level courses and exams while in high school. During fiscal year 2000, 43 percent of Minnesota secondary schools participated in the AP program while only two percent of Minnesota high schools participated in the IB program. Depending on the specific requirements of colleges and universities, the students participating in these programs are eligible to receive college credit for successful completion of comprehensive exams in specific subject areas.

In fiscal year 1993, the Minnesota Legislature began funding a program at the Minnesota Department of Children Families and Learning (CFL) to increase secondary school participation in the AP and IB programs. The purpose of the program is to:

- Provide financial incentives for schools to begin or expand their AP and IB offerings.
- Promote rigorous, challenging courses of study as part of regular offerings for students in secondary schools.

In fiscal year 2000, the legislature appropriated \$1,875,000 to CFL. The majority of this funding was used to provide subsidies to students taking AP and IB exams while 20 percent of the legislative funding was used to provide training and services for teachers of AP and IB courses.

MnSCU Board Policy 3.15 establishes a common practice for awarding credit based on student performance on AP examinations. Board Policy 3.16 establishes a practice for awarding credit for students who have completed IB diplomas in high school. Typically, MnSCU colleges and universities record credits earned for successful completion of AP and IB examinations as transfer credits on transcripts.

◆ Advanced Placement

The start of the AP program dates back to the 1950's. At that time, several people within the academic community were concerned that educational needs of talented high school students were not being met. A study sponsored by the Ford Foundation's Fund for the Advancement of Education concluded that a set of achievement exams was needed to enable colleges to give enterprising students advanced placement. The study recommended that an experiment be conducted under the direction of the College Board²⁸. At the same time, Kenyon College was conducting an advanced placement experiment among several colleges and high schools. From the results and recommendations of these two studies, the College Board assumed responsibility for the AP program.

²⁸ The College Board is a nonprofit association dedicated to preparing, inspiring, and connecting students to college and opportunities. The association was founded in 1900 and is currently composed of more than 3,800 schools colleges, universities, and other organizations.

The AP program gives students an opportunity to take college-level courses and exams while still in high school. Currently, 33 courses are offered in 19 subject areas, Exhibit II-1 lists the different subject areas. These courses are offered by over 13,000 secondary schools around the world. In Minnesota, 233 secondary schools participated in the AP program in fiscal year 2000. According to CFL, two or three times more Minnesota students take AP classes than take the exams.

Exhibit II-1
Advanced Placement Program Subjects

Art History	Human Geography
Biology	International English Language
Calculus	Latin
Chemistry	Music Theory
Computer Science	Physics
Economics	Psychology
English	Spanish
Environmental Science	Statistics
European History	Studio Art
French	U. S. History
German	World History
Government & Politics	

Source: The College Board website (www.collegeboard.com/ap/subjects.htm)

In Minnesota 13,018 students took 19,577 exams²⁹ during fiscal year 2000. Examinations are graded on a scale of 1 to 5. Of these students, 62 percent scored a 3 or above on the exams. According to MnSCU Board Policy, a score of 3 is the minimum for granting college and university credits. The policy also states that “no college or university shall limit the total number of credits a student can earn through AP courses and tests.” Individual colleges and universities have separate policies on awarding credits to specific courses.

The cost to take an AP exam is \$77, this cost includes an optional \$7 fee the secondary school can charge to cover the cost of incidental costs for sponsoring the exam. In Minnesota, no student is required to pay the entire cost of the exam. The CFL program funded by the Minnesota Legislature provides a subsidy for exam costs. Low-income students are not required to pay any portion of the cost while other students pay approximately \$20 per exam.

Additional information can be found on the AP program by accessing the College Board’s website at www.collegeboard.org.

²⁹ Minnesota Department of Children Families and Learning. Report on Advanced Placement and International Baccalaureate Program, FY 2000 Report to the Legislature, January 2001.

◆ International Baccalaureate

The International Baccalaureate Organization (IBO)³⁰ offers schools three related programs: The Diploma Program for students in the final two years of secondary school, the Middle Years Program for students aged 11 to 16, and the Primary Years Program for students aged 3 to 12.

There are 1,182 schools in 101 countries that participate in the IBO programs. There are 340 high schools in the United States that participate in the Diploma program. While only 25 schools participate in the Middle Years program, and 12 in the Primary Years program.

Exhibit II-2 lists the eleven Minnesota high schools that participate in the IB Diploma program. According to CFL, several more high schools are considering this program. In order to participate, high schools need to go through a rigorous acceptance process, which includes a site visit by the IBO. In addition, schools are required to have a membership in the IBO that costs approximately \$8,000 a year.

Exhibit II-2
International Baccalaureate Diploma Program
Participating Minnesota High Schools (*see Note 1*)

- | | |
|---------------------------|-----------------------|
| ◆ Fairmont | ◆ St. Paul – Central |
| ◆ Grand Rapids | ◆ St. Paul – Harding |
| ◆ Minneapolis – Henry | ◆ St. Paul – Highland |
| ◆ Minneapolis – Southwest | ◆ South St. Paul |
| ◆ Owatonna | ◆ St. Louis Park* |
| ◆ Robbinsdale - Cooper | |

* - *New participant for fiscal year 2001*

Note 1 – Currently, Minnesota does not have any schools participating in the IBO Middle or Primary Years programs.

Source: International Baccalaureate Organization

This Diploma Program began in 1968 as a pre-university course of study that leads to comprehensive examinations. According to the IBO, international educators were motivated by an idealistic vision for the program that “students should share an academic experience that would emphasize critical thinking, intercultural understanding and exposure to a variety of points of view.” Students may choose any number of individual IB courses and subsequent exams. The format of exams includes essay, multiple choice,

³⁰ The International Baccalaureate Organization (IBO) is a nonprofit educational foundation that was created in 1968 and is based in Geneva, Switzerland. Part of the mission of the IBO states that it “aims to assist schools in their endeavors to develop the individual talents of young people and teach them to relate the experience of the classroom to the realities of the world outside.”

short answer and oral. Students receive IB certificates for successful completion of courses. Students who choose to participate in the full diploma program are required to successfully complete courses and exams in six subjects within six groups. Exhibit II-3 summarizes these groups and subjects.

Exhibit II-3: International Baccalaureate Diploma Program Subject Areas

Group 1 - <i>Language</i>	Emphasis is on very good writing and oral skills within the student's first language.
Group 2 – <i>Second Language</i>	Focus is on students being able to use a second language in a range of contexts and for many purposes.
Group 3 – <i>Individuals and Societies</i>	Subjects include: business and management, economics, geography, history, history of the Islamic world, information technology in a global society, philosophy, psychology, and social anthropology.
Group 4 – <i>Experimental Sciences</i>	Subjects include: biology, chemistry, physics, environmental systems, and design technology.
Group 5 – <i>Mathematics</i>	Focus is on deepening a student's understanding of mathematics as a discipline and to promote confidence in its use.
Group 6 – <i>Arts and Electives</i>	Subjects include: visual arts, music and theatre arts.

Source: Summarized from information from the IBO.

In Minnesota, 977 students took 2,283 exams³¹ during fiscal year 2000. Examinations are graded on a scale of 1 to 7. Of these students, 71 percent received a score of 4 or above and 85 students were awarded the IB diploma. According to MnSCU Board Policy, students may be awarded up to 30 semester credits for successfully completing an IB diploma. Individual colleges and universities have separate policies on awarding credits to specific courses.

The cost to take an IB exam is \$168 for the first exam and \$48 for each additional exam. Like the AP program, no student is required to pay the entire cost of the exam. The CFL program funded by the Minnesota Legislature provides a subsidy for exam costs. Low-income students are not required to pay any portion of the cost while other students pay approximately \$38 for the first exam and \$13 for subsequent exams.

Additional information can be found on the IB programs by accessing the IBO's website at www.ibo.org.

³¹ Minnesota Department of Children Families and Learning. Report on Advanced Placement and International Baccalaureate Program, FY 2000 Report to the Legislature, January 2001.

Key Features of University of Minnesota PSEO Program

The University of Minnesota and MnSCU PSEO programs have many similarities, but also have some differences. At the University students who leave their high school for at least a portion of the day to take courses at a University of Minnesota campus are considered PSEO students. The University also offers college courses at secondary schools through a contract with the University. The University commonly refers to this portion of the PSEO legislation as College in the High Schools or College in the Schools (CIS). Each University of Minnesota campus operates autonomous PSEO and CIS programs. Exhibit III-1 summarizes the University of Minnesota campus participation under the PSEO legislation.

Exhibit III-1: PSEO Options for High School Students at the University of Minnesota

Campus	PSEO (1)	College in the High Schools (2)
Twin Cities	Yes	Programs in 44 high schools
Duluth	Yes	Programs in 12 high schools
Crookston	Yes	Programs in 28 high schools
Morris	Yes	No

- (1) The Department of Children, Families, and Learning (CFL) reported that participation in CFL funded PSEO at the University totaled 422 full year equivalents.
- (2) The University of Minnesota reported that participation in CIS programs totaled 639 full year equivalents.

Source: Prepared by MnSCU Office of Internal Auditing based on interviews with University of Minnesota representatives.

Although standards vary from campus to campus, PSEO and CIS program directors stated that the University of Minnesota experiences very low withdrawal or failure rates among its PSEO and CIS students. Generally speaking, these high school students are very motivated and perform well.

The remainder of this appendix highlights key features of the University of Minnesota's PSEO and CIS programs.

Admission Standards

PSEO Program

Admission into the PSEO program on the Twin Cities campus is competitive since it limits the number of PSEO students onto its campus. Representatives told us that they receive twice as many PSEO applications as spaces available. Although there are no minimum admission

criteria, most applicants have a grade point average of 3.7 or better and rank in the top 10 to 15 percent of their high school class.

At Duluth a high school student must be ranked in the top 20th percentile for 'automatic' entrance into the PSEO program. Students with rankings below the 20th percentile may be accepted in on probation. In general, Duluth's PSEO students come in with a grade point average of approximately 3.8.

The Crookston campus recently increased its required grade point average to 3.0 or better in order for high school students to participate in the PSEO program.

The Morris campus does not specifically define PSEO admissions criteria. Instead, the campus requires high school students to complete the application process like regular undergraduate students and must submit ACT test scores. In general, a high school student must score at least 25 on the ACT to be accepted into the Morris campus PSEO program.

College in the High School Program

A high school student must rank in the top 20 to 30 percent of their high school class to participate in a CIS course at the Twin Cities campus. The rank requirement varies by academic area. Three out of the eight disciplines that offer CIS courses require the students to be in the top 20 percent of their class while the remaining require the students to be in the top 30 percent.

The Duluth campus requires CIS students to be ranked in the top 20 percent of their high school class while the Crookston campus requires its CIS students to have a grade point average of 3.0 or better to be admitted into the program.

Assessment Testing

In general, the University of Minnesota campuses do not require PSEO students to complete assessment tests. Commencing with the 2001-02 academic year the Twin Cities CIS program will require that students enrolling in a Hebrew course to take an assessment test.

Satisfactory Academic Progress

PSEO Program

Twin Cities PSEO students are required to maintain a cumulative or a term grade point average of 2.5 or higher to remain in the PSEO program. If students receive a grade of 'C' or lower in one or more classes, regardless of their cumulative or term grade point average, they are required to reduce their University of Minnesota enrollment for the subsequent term, i.e. from three courses to two courses. A process is in place for students to appeal this policy.

Duluth PSEO students must receive no less than a grade of 'C' in any course they are taking. For example, students receive a 'D' in any course are placed on probation for the next semester. If a grade of 'D' is received in the subsequent semester the student is automatically dismissed from

the PSEO program.

The Crookston campus requires PSEO students to maintain a grade point average of 2.0 or greater each term. If they do not meet this requirement they are dismissed from the PSEO program.

The Morris campus requires PSEO students to maintain a cumulative grade point average of 2.0 or better.

College in the High School Program

Duluth indicated that satisfactory academic progress is not an issue, as most often these students are high school seniors who were 'hand picked' and perform very well. On occasion a few 'top' high school juniors are selected.

Crookston's CIS students must receive a grade point average of 3.0 or better. This grade point average is calculated on both high school and college level courses.

Academic Progress Reviews

Academic progress reviews are completed for PSEO students whose chance of success in the program is in question. The Twin Cities campus mails “monitoring letters” at mid-term to faculty for each course a PSEO student takes. These letters inquire about attendance, performance and class participation, and allow the instructor to add comments as deemed necessary. If problems are identified the student is requested to make an appointment with their advisor to discuss options and resources.

Duluth PSEO students are required to meet with a program director each semester. If a PSEO student is on academic probation the PSEO Director sends a letter out to all the PSEO student's instructors requesting feedback on the student’s academic performance. If the director determines the student is not doing well the director may request an additional meeting with the student.

No reviews are completed for CIS students. Program directors felt this was the responsibility of the high school.

Financial Arrangements

All University of Minnesota campuses receive payment for PSEO students from CFL. They do not contract with high schools for student to take on-campus courses. The contracted fees for CIS courses vary from campus to campus. See Exhibit III-2 for rates for the 2000-01 school year.

Discrete Class Requirement

The only University of Minnesota campus that requires discrete classes is Crookston. Other campuses felt that discrete classes were ideal but not required.

Exhibit III-2: CIS Financial Arrangements

Campus	2000-01 CIS Fees
Twin Cities	\$117.50 per student per course
Duluth	\$150 per student per course
Crookston	\$300 per course plus \$10 for each student enrolled
Morris	N/A

Source: Prepared by MnSCU Office of Internal Auditing based on information provided by University of Minnesota representatives.

CIS Quality Assurance Mechanisms

Program directors for University of Minnesota campuses felt that the selection process for CIS high school teachers provided a mechanism to ensure quality CIS instruction. Exhibit III-3 summarizes minimum credentials required for high school instructors to teach CIS courses.

Exhibit III-3: CIS Minimum High School Teacher Credentials

Campus	Minimum Credentials
Twin Cities	A Master's degree is preferred but not required. A high school teacher must have experience teaching advanced high school students and a strong academic background in the discipline they want to teach a CIS course in.
Duluth	Five years teaching experience or a master's degree
Crookston	Bachelor's degree plus 18 master's degree credits in the assigned area. An appeal process is in place for a secondary school to appeal this requirement.
Morris	N/A

Source: Prepared by MnSCU Office of Internal Auditing based on information provided by University of Minnesota representatives.

In addition, each university campus offering the CIS program has an orientation program for high school teachers. Exhibit III-4 summarizes the high school teacher orientation programs for CIS courses.

University faculty coordinators are not required to visit classrooms when working with CIS high school teachers. Twin Cities coordinators, however, try to visit classrooms for new teachers. Duluth faculty, may visit classrooms to observe and sometimes teach. They are reimbursed a flat rate for classroom visits.

The Crookston CIS program requires that the curriculum for a CIS course be the same as an on-campus course. One way of assuring this is through the use of the same textbooks and teaching materials. Crookston does not require faculty liaisons to go into the classroom and observe the instructor or student interaction. However, some faculty liaisons have 'electronic' connections with high school teachers.

Exhibit III-4: Orientation for CIS High School Teachers

Campus	Orientation Program / Process
Twin Cities	CIS high school teachers attend 2 to 4 disciplined based workshops per year. These workshops are designed by the college faculty coordinators and focus on content and the art of teaching.
Duluth	High school instructors attend a summer workshop with UMD faculty mentors. Course curriculum and expectations along with other CIS topics are discussed.
Crookston	A CIS program meeting is generally held each spring.
Morris	N/A

Source: Prepared by MnSCU Office of Internal Auditing based on information provided by University of Minnesota representatives.