



October 20, 2022

Senior Year Plus: The Basics of Concurrent Enrollment

The Iowa Department of Education hosted a statewide [webinar](#) on September 29, 2022 that focused on the senior year plus concurrent enrollment program, also known as district-to-community college sharing (281 IAC 22.11). Several questions were asked by stakeholders during the webinar and this document outlines those questions and provides the associated answers.

- [Does the Department provide guidance to the community colleges on the credentials needed to teach courses at the community college level through the concurrent enrollment program?](#)
- [Do we have to partner with our local community college?](#)
- [We typically hear that none of the community colleges allow enrollment through the Postsecondary Enrollment Options \(PSEO\) program. If we do not enter into a concurrent enrollment/district-to-community college sharing agreement with a community college, would the community college have to allow enrollment through PSEO?](#)
- [If a student from a neighboring state would like to enroll through the concurrent enrollment program through an Iowa school district, is this allowed?](#)
- [If a course is *not* on the high school's contracted concurrent enrollment course list, is the district obligated to pay for the student to enroll in that course through the concurrent enrollment program?](#)
- [I thought if a student dropped or failed a concurrent enrollment course, which does not have supplemental weighting, the student can be charged for the cost of the class, correct?](#)
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- [We award high school credit if the student successfully completes the concurrent enrollment course. Do students need to sign a FERPA release/waiver with the community college in order for the community college to share those grades with the school district?](#)
- [How does FERPA apply if the teacher is a district employee but teaching a concurrent enrollment class in the high-school? Can the concurrent enrollment teacher share information about the enrolled student directly with the parent if they ask about their students' progress in the concurrent enrollment course?](#)
- [Do you have data to support cost of attendance and time to complete a degree program is reduced for Iowa high school students attending Iowa colleges and universities?](#)
- [Can you provide the enrollment links for the senior year plus and career and academic planning newsletters?](#)

Questions and Answers

Does the Department provide guidance to the community colleges on the credentials needed to teach courses at the community college level through the concurrent enrollment program?

Yes. All instructors teaching college credit courses must meet state of Iowa minimum faculty standards, which are outlined within the [Faculty Qualifications Guide](#) – this includes full-time, adjunct, and concurrent enrollment teachers. District-employed concurrent enrollment teachers serve as community college adjunct faculty and must meet the college requirements for on-campus instructors (281 IAC 21.3). Each community college maintains the authority and responsibility to authorize and approve any high school concurrent enrollment instructor. It is also within each institution's local authority to set hiring requirements higher than the state's minimum requirements, if they choose to do so. However, it *would not* be permissible for a community college to set different credentialing requirements for concurrent enrollment teachers. For example, a community college requires any teacher wishing to teach a concurrent enrollment course to have prior teaching experience, but does not require prior teaching experience for the community college employed adjunct or full-time faculty, this is not permissible – requirements must be the same.

Do we [school district] have to partner with our local community college?

It is established in statute (260C.2(5)) that community colleges have defined service regions; and prevailing practice for each community college, except under extenuating circumstances, is to confine their concurrent enrollment practices to their own region. While this arrangement is not stipulated by law, colleges each serve their own region and are not required to establish concurrent enrollment contracts with districts or accredited nonpublic schools outside of their service area unless there are extenuating circumstances (i.e., a college does not offer a certain program or course). The community colleges have also agreed that prior to entering into a

concurrent enrollment contractual agreement which crosses a community college regional border, they will contact the community college in which the school district or accredited nonpublic school is located to have the arrangement approved by each community college impacted and included in the contract. There is nothing preventing a school district or accredited nonpublic school from reaching out to another community college, but there is no guarantee or no requirement that the other community college agree to work with the requesting school district or accredited nonpublic school ([SYP Guide](#), pg. 53).

We [school districts] typically hear that none of the community colleges allow enrollment through the Postsecondary Enrollment Options (PSEO) program. If we [school district] do not enter into a concurrent enrollment/district-to-community college sharing agreement with a community college, would the community college have to allow enrollment through PSEO?

Yes. However, if a school district has a contractual agreement with a community college, enrollments through PSEO are not permissible through any of the state's 15 community colleges (281 22.17(3)). In practice, this means that the vast majority of high school student enrollment in community college coursework will be through the concurrent enrollment program. Only in rare circumstances, such as a district without any contractual agreement, is enrollment in a community college course through PSEO permissible.

The Department recommends that any school district who is considering to dissolve their district-to-community college/concurrent enrollment sharing agreement with their community college, to consult their partnering community college and the Department's Senior Year Plus consultant to discuss all potential implications of dissolving such contractual agreement.

If a student from a neighboring state would like to enroll through the concurrent enrollment program through an Iowa school district, is this allowed?

No. Students from a bordering state who elect to attend an Iowa school are not Iowa residents and cannot receive college credit under the concurrent enrollment program. This would not preclude the out-of-state student from accessing a community college course offered at the high school location as a tuition-paying student. Because concurrent enrollment courses are district offerings, an out-of-state student may enroll in the course, but must do so directly with the community college. Payment of tuition is the responsibility of the parent and not a district responsibility. The amount of tuition the community college charges would be a decision of the postsecondary institution -if the institution charges full tuition or provides the student the negotiated district tuition rate ([FAQ Student Tuition and Fees](#), pg. 43).

If a course is not on the high school's contracted concurrent enrollment course list, is the district obligated to pay for the student to enroll in that course through the concurrent enrollment program?

No. A school districts board must annually approve the list of concurrent enrollment courses they will make available to students through the concurrent enrollment program (281 IAC 22.11(3)). Any course not contracted through the program, the district would not be required to make available to students, nor would they be responsible to cover the cost of enrollment.

I thought if a student dropped or failed a concurrent enrollment course, which does not have supplemental weighting, the student can be charged for the cost of the class, correct?

No. Students may not, under any circumstance, be charged tuition for any contracted course under the concurrent enrollment program, regardless if the district receives supplementary weighted funding for the course (281 IAC 22.11(6)). This includes if the student withdraws from the course, drops the course or fails the course. Because the concurrent enrollment courses are part of the district's curriculum, schools may not charge fees for courses offered as part of their educational program, and such fees constitute tuition.

In order for a student to access college credit courses under the concurrent enrollment program, at what grade-level must they demonstrate proficiency [through the school district] if utilizing the Iowa Statewide Assessment of Student Progress (ISASP) to determine eligibility?

Districts utilizing the ISASP to determine a student's proficiency will want to refer to the proficiency cut score ranges for ISASP performance levels ([SYP Guide](#), pg. 9 Table 1). Districts will refer to the "proficient" range of scores when determining eligibility. Scores for each grade level will be obtained from the most recent administration of statewide assessment. As a reminder, there is no proficiency requirement for CTE courses, students must only demonstrate proficiency in reading, mathematics and science in order to access arts & sciences courses.

Do we [school district] have to offer another way for students to demonstrate proficiency other than the ISASP?

Students shall have demonstrated proficiency as evidenced by achievement of any of the following options (*281 IAC 22.2(2)*):

1. Achievement scores on the most recent administration of the statewide assessment (ISASP).
2. Measures of college readiness jointly agreed upon by the school board and the eligible postsecondary institution that allow a student to demonstrate competency in one or all of the required subject areas.
3. Alternative but equivalent qualifying performance measures, if established by the school board.

Under option #2, the measures of college readiness must be specified in a contract entered into by the participating institutions, if the school district and community college enter into such agreement, the school district will be required to allow a student to demonstrate proficiency through measures of college readiness. Under option #3, it is at the discretion of the districts school board if alternative but equivalent performance measures are established.

It is important to remember that the additional options to the proficiency requirement were established as a means for students who may not do well on tests or do not have scores from the ISASP but are able to demonstrate subject proficiency through their work, projects or additional measures of college readiness. The Department strongly encourages postsecondary institutions, in cooperation with their school district partners to jointly establish measures of college readiness ([see guidance](#)).

Do the qualifications [measures of college readiness jointly agreed upon by the school board and eligible postsecondary institution] need to be board approved or just agreed upon by the community college and the high school?

Per administrative rule (*281 IAC 22.2(2)(2)*), the measures of college readiness must be specified in a contract entered into by the participating institutions.

Do students have to demonstrate proficiency in all content areas of reading, mathematics, and science?

Yes. However, a school district may establish alternative but equivalent qualifying performance measures OR measures of college readiness jointly agreed upon by the school board and the eligible postsecondary institution that allow for a student to demonstrate proficiency in one or all of the required subject areas. For example, if the student tested proficient in English-language arts, but not math or science – the student would be eligible to access humanities and social/behavioral science coursework but not STEM courses.

Can a school district establish registration deadlines? For example, if a student submits the required paperwork to enroll in a concurrent enrollment course after the established registration deadline, may the student be told they may not enroll?

Yes, a district may establish registration deadlines. Provided the district has a clearly outlined process for enrollment into concurrent enrollment courses, which may align with the district's general registration timeline, a district may set a reasonable registration deadline. Districts will need to ensure if registration deadlines are established that they are communicated to students and parents in a timely manner, including responding to any information requests. Withholding or delaying information would be improper and any issues related to a district established deadline will need to be addressed on a case-by-case basis. Districts adopting deadlines for notices of intent to enroll in concurrent enrollment courses should consider setting fall and spring deadlines that allow for proper enrollment of the student prior to the start of the semester. If a student and/or parent feels the deadline established by the district is unreasonable, they may appeal the district's decision to the State Board of Education.

Can a high school decide to only award elective credit for all concurrent enrollment courses taken?

This will depend on how the school district has structured their graduation requirements. A school district has the local authority to be specific about which courses students may use to meet a district graduation requirement or the district may indicate a general unit requirement for each graduation/subject area requirement. If a district is specific about which courses must be used to meet each unit requirement then that may prevent a concurrent enrollment course from being used to meet that specific graduation requirement. However, if the district is not specific about the courses needed, and they just have a general unit requirement for each subject area, then that should not prevent a student from using a concurrent enrollment course to potentially meet a graduation requirement if the concurrent enrollment course meets the associated subject area requirement. Once a district contracts a course with the community college, the concurrent enrollment course becomes part of the district's course offerings/curriculum. District's should not be treating the concurrent enrollment courses separately. To establish a blanket policy that all concurrent enrollment courses will only count towards elective requirements would be improper.

Can a high school require a student to exhaust high school credit only curriculum prior to enrollment into a concurrent enrollment course? For example, require a high school student to take the high school credit psychology course prior to taking intro to psychology from the community college?

In general, no. Statute prohibits a school district from establishing pre-requisites or imposing additional restrictions on participation that are not expressly established in state law (*281 IAC 22.4(1)(h)*). Requiring that a student first complete other high school coursework would conflict with both those provisions. A "caveat" to this would be if a district requires specific coursework in order to graduate for all students, in which case those courses would not be considered a "prerequisite" and a student would be expected to complete those courses, perhaps in a specific order, which may limit access to concurrent enrollment but not outright restrict access.

For the sake of clarity, if a student fails a course at the community college, schools cannot prohibit a student from taking courses at the community college for future semesters or school years?

Correct. The institutions (school district and community college) may not place restrictions on participation in senior year plus programming beyond that which is specified in statute or administrative rule (*281 IAC 22.4(1)(h)*). While a district may not prohibit a student from further participation in concurrent enrollment for failing to successfully complete a course, the district has a strong responsibility to advise students about the consequences of failing college courses and the prudence of further participation. Additionally, school districts do have an obligation to ensure students are on track to graduate. If the student is not on track to graduate

that may prevent the student from accessing other opportunities (such as concurrent enrollment courses) but this would need to be evaluated on a case-by-case basis for each student.

If a high school student earns a poor grade in a concurrent enrollment course, could that impact their academic standing through the attending community college?

Possibly. Each of the state's 15 community colleges will have academic standards by which they monitor a student's academic progress, and these academic standards extend to students enrolled in concurrent enrollment courses. Both the school district and community college are required to provide a summary of applicable policies and procedures related to a student's enrollment into any senior year plus program, which includes information on the community colleges academic standing policy (281 IAC 22.4(1)). School districts should work closely with their partnering community college to ensure a strong understanding of the institution's academic standing policy and how that policy applies to students who are concurrently enrolled.

Can grades a student received in high school while enrolled in a concurrent enrollment course impact their future ability to receive financial aid?

Possibly. The general information that students and families should be made aware of and understand is the requirement to make satisfactory academic progress (SAP), and that failure to do so may result in a loss of eligibility to receive federal aid. [Federal regulations](#) require that all students maintain SAP in their program of study, regardless of whether or not financial aid has been awarded. Students will need to verify with their prospective postsecondary institution how their grades earned may impact their future ability to obtain financial aid, as each postsecondary institution will have a specific SAP policy for financial aid purposes.

Does a postsecondary institution have any way to know that a student has prior college credit and/or failed a college course while in high school?

The vast majority of postsecondary institutions will ask students during the admissions process to submit official transcripts from all schools and colleges they have attended, including those during high school. Failure of the student to report this information during the admissions process would likely be considered as unethical by the attending postsecondary institution. Therefore, it is best practice for the student to connect with the enrolling postsecondary institution to learn how any prior course credit may be reflected at the postsecondary institution. Additionally, all postsecondary institutions have access to the [National Student Clearinghouse](#) which provides record of a student's enrollment through any postsecondary institution that they have attended. However, postsecondary institutions do not have access to the individual transcript unless the transcript has been officially sent by the student.

Can you clarify the number of college credits a high school student may take each year?

There is no longer a statutory limit on the number of college credits a student may enroll in over the course of an academic year. Please see [additional guidance](#) regarding changes impacting full-time enrollment through senior year plus programs.

If the concurrent enrollment course is offered on site at the high school but the student enrolls in the same course online through the community college, is this considered supplanting?

No. School districts determine prior to contracting a postsecondary course if the postsecondary course will supplant a district offering (i.e., determine if the course is comparable to one already offered by the school district). School districts contract courses, and once the specific courses are contracted, they become available to students in any instructional delivery method made available by the postsecondary institution (i.e., face-to-face in the high school; face-to-face at a college campus; online). ([see pg. 20 and pg. 23 of the SYP Guide](#)).

What is our [school district] responsibility of sharing information about enrollment options for concurrent enrollment?

Notice of the availability of the program must be included in a school district's student registration handbook, and the handbook must identify which courses, if successfully completed, generate college credit under the program (281 IAC 22.11(1)(a)). Please note, this information must include all courses the district contracts with the community college through the concurrent enrollment program. Additionally, students and the student's parent or guardian must also be made aware of the program as part of the development of the students core curriculum plan (ICAP) in accordance with Iowa Code section 279.61.

We [school district] do not have a textbook fee, is it ok to have students pay for textbooks in their concurrent enrollment courses if the student keeps them?

If the school district does not have a textbook fee, and provides books to students at no cost, it would not be permissible for a district to require a student to purchase textbooks needed for their concurrent enrollment course(s); textbooks must be provided to students in the same manner as districts provide books for other courses ([see pg. 27 of the SYP Guide](#)). There would be nothing preventing the student from purchasing the textbook if they want to keep it, but requiring the student to purchase the book would equate to charging tuition for the course which is expressly prohibited in state law.

Is there any financial obligation towards the student for textbooks if they are not returned or damaged?

Schools may charge a fee for lost, damaged, or unreturned textbooks. The charge allowed may be for no more than the actual cost of the textbook ([FAQ Student Tuition and Fees](#), pg. 49).

There is a limit on the number of concurrent enrollment courses students may take who are under private instruction. Can you share more about this?

A student under private instruction (home school) is allowed to access concurrent enrollment courses on the same basis as a regularly enrolled student of the district. However, a student who is under private instruction may not be enrolled in more than 75% of the district's school day, this percentage includes any courses under the concurrent enrollment program (see [Private Instruction Handbook](#)).

How does a school district determine eligibility for a student who is dual enrolled under competent private instruction (CPI) if they want to access concurrent enrollment arts & sciences courses if they do not take the Iowa Statewide Assessment of Student Progress (ISASP)?

Students who are under CPI and dual enrolled must be permitted to demonstrate academic eligibility to participate in Senior Year plus programs by assessment scores from the ISASP or by any of six alternative means (see [Iowa Administrative Code 281-22.2\(2\)\(4\)](#)). A district does not have the discretion to refuse to consider any of the alternative means of demonstrating proficiency.

We [school district] award high school credit if the student successfully completes the concurrent enrollment course. Do students need to sign a FERPA release/waiver with the community college in order for the community college to share those grades with the school district?

No. Partnering high schools accepting college credit for high school credit have a legitimate educational interest in obtaining certain information about students. This information may be freely exchanged between the community college and the high school, without consent of the student.

How does FERPA apply if the teacher is a district employee but teaching a concurrent enrollment class in the high-school? Can the concurrent enrollment teacher share information about the enrolled student directly with the parent if they ask about their students' progress in the concurrent enrollment course?

District-employed concurrent enrollment instructors serve as community college adjunct faculty. Even though the teacher is employed by the high school, the course is designated as a college-level class once contracted with the postsecondary institution, even if the course is held in a school district classroom. During the time/period of day the contracted course is taught it is designated as a community college campus site/location. Therefore, concurrent enrollment instructors must understand they are held accountable for maintaining the privacy of student records regardless of the location the course is taught. FERPA applies even when a high school teacher is instructing the course in partnership with the community college. District-employed concurrent enrollment instructors may share student information with designated school officials due to a "legitimate educational interest" but may not do so directly with a parent without the students consent. Because FERPA's application to high school students enrolled in college courses can be confusing, it's encouraged that community colleges and school districts consult their legal counsel to ensure their concurrent enrollment partnership's policies and practices meet state and federal legal requirements.

Do you have data to support cost of attendance and time to complete a degree program is reduced for Iowa high school students attending Iowa colleges and universities?

In 2021, the Iowa Department of Education released its first ever longitudinal study that tracked 29,000 high school graduates from the class of 2011 over an eight-year period. It compares postsecondary enrollment and completion rates of students who jointly enrolled in community college credit courses while in high school and students who did not. Out of the 17,508 high school students from the class of 2011 who earned college credit in high school, 75.5 percent enrolled in college immediately after graduating, and of those, 59.1 percent achieved a degree within 8 years. In comparison, 50.4 percent of students who did not earn college credit in high school immediately enrolled in college. Of those, 32.8 percent completed a degree or transferred during the same time frame. Additional metrics were looked at including the potential tuition savings of students based on credits earned. The full *Outcomes of Jointly Enrolled Students* report may be found [here](#). Additional information may also be found on the Iowa Student Outcomes [website](#).

Can you provide the enrollment links for the senior year plus and career and academic planning newsletters?

You may sign up [here](#) for senior year plus program updates and [here](#) for updates on career and academic planning.

Contact

Please contact Jen Rathje at jennifer.rathje@iowa.gov or 515-326-5389 with questions or comments regarding Concurrent Enrollment/Senior Year Plus programs.

Please contact Erica Woods-Schmitz at erica.woods-schmitz@iowa.gov or 515-330-0185 with questions or comments regarding Career and Academic Planning.