OER in Dual Enrollment

Leveraging Open Educational Resources to Expand Equitable Access

October 2021
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Introduction

Thanks to generous support from the Hewlett Foundation, the Midwestern Higher Education Compact and the Southern Regional Education Board have contracted for the publication of this report, with the collaboration of the College in High School Alliance, the National Alliance of Concurrent Enrollment Partnerships and the Open Education Network. It aims to identify current policy and practice and present the best lessons learned in the use of OER in dual enrollment.

This report is intended for dual and concurrent enrollment stakeholders, and open educational resource stakeholders, at the state and local level (representing both K-12 and postsecondary partners) who are interested in exploring or expanding upon the use of open educational resources in their courses, including through dual and concurrent enrollment partnerships.

The report was informed by 11 remote interviews with 19 state and local stakeholders in nine states after a call for interviews on MHEC, SREB, and OEN listservs. Many thanks to the following individuals interviewed for this report:

- Zachary Adams, Tennessee Board of Regents
- Lisa Chestnut, Josie Mills and Monica Fuglei, Arapahoe Community College
- Rebel Cummings-Sauls, Florida Virtual Campus — Library Services
- Carl Einhaus and Spencer Ellis, Colorado Department of Higher Education
- Brittany Dudek and Tammy Ward, Colorado Community College System
- Kathy Feichter, Stark State College
- Teri Gallaway, Louisiana Board of Regents
- Larisa Harper, Ohio Department of Higher Education
- Robert Keown, Technical College System of Georgia
- Paul Preimesberger, Central Lakes College
- Kelly Smith, Kelly Clark and Kate DeKam, Baker College
- Kylah Torre and Michelle Singh, Texas Higher Education Coordinating Board
What Are Open Educational Resources?

Open educational resources, or OER, are openly licensed educational resources that users are permitted to access, re-use and redistribute. Disseminated electronically at no cost or printed from online at relatively low cost, OER may be textbooks or supplemental instructional materials, including but not limited to PowerPoints, study guides, problem sets, homework assignments, quizzes and exams.

OER may be developed and hosted by a variety of sources, including:

- **Organizations with a national reach.** Examples include OpenStax, a 501(c)(3) housed at Rice University, that vets and publishes openly available college textbooks; and the Open Textbook Library, a collection of college OER curated by the Open Education Network at the University of Minnesota’s College of Education and Human Development.

- **State agencies.** One example is the Texas Higher Education Coordinating Board, which houses the OERTX Repository, a public collection of OER developed by postsecondary institutions, foundations and other private sector partners based both in the U.S. and internationally.

- **Institutions**, or individual faculty within an institution.

In addition to their minimal to zero cost, OER have the benefit of being readily adapted, allowing content to be tailored to specific course outcomes or objectives, or to an instructor’s preferences. Content can likewise be readily amended to reflect historical updates, scientific and technical advances, or new insights or perspectives in a discipline or technical field, getting new content into the hands of students more quickly than waiting for a traditional textbook publisher to update content in a new edition. For career and technical education courses, if an employer notes that a technology described in a text is no longer in use, the instructor has the flexibility to update language to reflect current employer practices.

What Is Dual Enrollment?

Dual enrollment, also known as concurrent enrollment, dual credit and by other terms, refers to college courses offered to high school students, often for both high school and college credit. Programs can vary by instructor type (either postsecondary faculty or a high school instructor approved by the offering postsecondary institution); course type (either liberal arts or career and technical education courses or both); course location (at the high school or college, or a third-party location); and modality (face-to-face, fully online or hybrid), to name just a few differences. This report uses the term “dual enrollment” to refer generally to college courses offered to high school students, regardless of course type, location, instructor type or modality.
In 2017-18, 82% of high schools reported offering dual or concurrent enrollment courses, reflecting significant growth from less than a decade earlier; in 2010-11 53% of postsecondary institutions reported offering course access to high school students. However, despite these gains in dual enrollment offerings, state and national data reveal persistent gaps in student access and participation. For example, a U.S. Government Accountability Office analysis of federal data indicates that high-poverty, urban, small and specialized high schools are less likely to offer dual enrollment programs. And data from the National Center on Education Statistics suggests that students of parents with lower levels of educational attainment and Black and Hispanic students experience lower dual enrollment participation rates than students of parents with higher educational attainment levels and white and Asian students.

These disparities in dual enrollment access and participation are all the more troubling given the convergence of data demonstrating the financial returns to individuals completing a college degree, as well as data on dual-enrolled students’ greater likelihood of enrolling in college and completing a postsecondary credential.

Making the Case for OER in Dual Enrollment

_Dual Enrollment Courses Generally Use Same Textbooks as On-Campus Courses_

National organizations (such as National Alliance of Concurrent Enrollment Partnerships, College in High School Alliance and Jobs for the Future) and regional accrediting bodies alike stress the importance of college courses offered to high school students replicating the rigor of an on-campus course, including using the same or equivalent textbooks and other course materials. For example, NACEP maintains standards that postsecondary programs must demonstrate to attain NACEP accreditation. NACEP Curriculum Standard C2 implies that college courses offered in a high school by a NACEP-accredited program use the same textbooks and other instructional materials: “The college/university ensures the concurrent enrollment courses reflect the learning objectives, and the pedagogical, theoretical and philosophical orientation of the respective college/university discipline.” As of July 2021, some 25 states either (1) require or encourage postsecondary programs offering college courses in high schools to adhere to the NACEP standards; (2) have adopted standards or guidelines modeled after the NACEP standards; or (3) have adopted policies or program guidelines that align with individual NACEP standards, including Curriculum Standard C2.

Regional postsecondary accreditors also maintain standards to which colleges and universities in their region must adhere to maintain accreditation, including when their courses are offered to high school students. Some regional accreditors have released guidelines making clear that dual enrollment courses must demonstrate the same rigor as the equivalent on-campus course offering. For instance, the Southern Association of Colleges and Schools Commission on Colleges,
which accredits postsecondary institutions in 11 Southern states, released a Dual Enrollment Policy Statement to all SACSCOC-accredited institutions in June 2018. The statement includes a note that “Course content and rigor of dual enrollment courses are comparable to that of the same courses taught to the institution’s other students,” which is generally interpreted to mean that dual enrollment courses must use the same or equivalent textbooks as courses taught to regularly matriculated students.

Similarly, the Higher Learning Commission accredits postsecondary institutions in 19 states, primarily but not exclusively in the Midwest. One of the HLC accreditation standards on academic rigor states, “The institution’s program quality and learning goals are consistent across all modes of delivery and all locations (on the main campus, at additional locations, by distance delivery, as dual credit, through contractual or consortial arrangements, or any other modality).”

**College Textbook Costs Present Barriers to Course Availability, Access and Success**

As indicated in the 2019 Funding for Equity report, a number of states have invested significantly in recent years to make tuition-free dual enrollment courses available to all students. However, even in states that offer tuition-free dual enrollment courses, supplemental course participation costs, including textbook costs, can place these tuition-free courses out of reach for many students.

A recent analysis by EducationData.org found that the average price of hard-copy college textbooks ranges from $80 to $150, with some costing as much as $400. Given that millions of students are enrolled in dual enrollment courses annually, and generally must use the same textbook as when the course is offered to regularly matriculated students, the potential annual cost of textbooks for dual enrollment courses is staggering.

In many states, policy is silent on which entity must bear dual enrollment textbook costs, or it may require that students do, or that secondary and postsecondary partners determine this responsibility in a local partnership agreement. (In this approach, textbook expenses may ultimately fall to the student.) Only a handful of states make funds available to cover the cost of low-income students’ textbooks or provide that costs associated with dual enrollment coursework may not pose a participation barrier to any student.
Regardless of which entity is responsible for covering the cost of dual enrollment textbooks, those costs can pose barriers to course availability. If textbook costs fall to the school district or postsecondary institution, financial constraints may limit the number of dual enrollment course offerings, or the number of dually enrolled students, per term or per academic year. State policies that are silent on the entity responsible for covering textbook costs — or that call for local partners to determine the entity responsible — can create significant within-state inequities in course availability and student participation. And when students or their families are responsible for covering textbook costs, dual enrollment programs face arguably the most direct detrimental impact on equitable participation.

Another aspect of hard-copy textbooks can present downriver implications regardless of which entity is responsible for purchasing them. A new edition of a textbook may amount to nothing more than a new foreword, but for a program to comply with requirements that the dual enrollment course use the same textbook as the on-campus offering, all new textbooks will need to be purchased. This potentially limits the number of other course sections the partnership can afford to offer.

A school district or postsecondary partner responsible for covering student textbook costs, and concerned about insufficient funds to purchase replacement textbooks, may hope that a single set of textbooks can be used by other students taking the same course at a later date. In such circumstances, dual enrollment instructors may tell students not to write notes in their hard-copy textbooks or not to take their textbooks home to study. As one institution-level stakeholder interviewed for this report commented, not being able to write notes in their textbook or take their textbook home may be detrimental to student learning and course success.

The high cost of many traditional hard-copy STEM textbooks, which are often more expensive than textbooks in other subject areas, may precipitate program-by-program inequities in STEM dual enrollment course availability. A cash-strapped district or postsecondary institution which must pay for dual enrollment textbooks may offer students few to no STEM courses, while a more affluent district or institution might offer an array of STEM coursework. Even where STEM dual enrollment courses are available, a student in a program in which students pay for their own textbooks may find herself unable to participate, even if tuition is covered.
Traditional hard-copy textbooks that must be shipped to students can also pose problems when students receive textbooks late (or not at all), forcing them to fall behind in the course. Students may be required to ship hard-copy textbooks back and can even be charged if the textbook arrives late or not at all.

The table on page 6 provides an overview of state policies as of spring 2021, identifying the entity (state, district, postsecondary institution, student, local decision or policy silent) responsible for covering dual enrollment textbook costs generally.

<table>
<thead>
<tr>
<th>Responsible entity</th>
<th>How it looks in state policy</th>
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<tbody>
<tr>
<td>State</td>
<td>For all eligible students within a program, state funds are appropriated or allocated explicitly to cover participating students' textbook costs</td>
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<td>District</td>
<td>The partnering school district must purchase dually enrolled students’ textbooks.</td>
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<tr>
<td>Postsecondary</td>
<td>The partnering postsecondary institution must purchase dually enrolled students’ textbooks.</td>
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<td>Postsecondary institution</td>
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<tr>
<td>Student</td>
<td>The dually enrolled student must purchase their own textbooks.</td>
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<td>Local decision</td>
<td>State policy explicitly requires the memorandum of understanding or partnership agreement between the secondary and postsecondary partner to specify which entity or entities will purchase textbooks.</td>
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<tr>
<td>Policy silent</td>
<td>State policy does not explicitly dictate that local dual enrollment partnerships determine which entity will bear textbook costs, and does not assign responsibility to a specific entity (district, student, postsecondary partner, etc.)</td>
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<td></td>
<td>In practice, the entity responsible for purchasing dual enrollment textbooks may be any of the above, or an external partner such as a local business or foundation.</td>
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Sources for state policies listed in Appendix B. Appendix C provides details on state policies that allow alternatives to or exceptions from these broad state categories.
Some states are listed more than once because different statewide dual enrollment programs designate different entities as responsible for covering textbook costs, or costs may be split between multiple entities.

<table>
<thead>
<tr>
<th>State</th>
<th>District or secondary school</th>
<th>Postsecondary institution</th>
<th>Student</th>
<th>Local decision</th>
<th>Policy silent</th>
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<tbody>
<tr>
<td>Georgia</td>
<td>Iowa for Postsecondary Enrollment Options courses</td>
<td>Alabama for dual enrollment in community colleges generally</td>
<td>Alabama for Career and Technical Education Dual Enrollment Scholarship</td>
<td>Arizona for both dual enrollment and concurrent enrollment</td>
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<tr>
<td>Michigan</td>
<td>Michigan for public school students in Postsecondary Enrollment Options and Career and Technical Preparation courses</td>
<td>Alaska</td>
<td>Arkansas for Concurrent Enrollment</td>
<td>California for non-College and Career Access Pathways courses</td>
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<tr>
<td>Minnesota</td>
<td>New Mexico for Postsecondary Enrollment Options courses</td>
<td>Kansas for Concurrent Enrollment Partnerships</td>
<td>California for College and Career Access Pathways</td>
<td>Connecticut</td>
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</tr>
<tr>
<td>Iowa</td>
<td>Washington for Career and Technical Education Dual Credit</td>
<td>Louisiana</td>
<td>Colorado</td>
<td>Delaware</td>
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<tr>
<td>Oklahoma</td>
<td>Wisconsin for Start College Now, and Early College Credit Program courses offered at the high school</td>
<td>Maine</td>
<td>Florida</td>
<td>DC</td>
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<tr>
<td>South Carolina</td>
<td>Vermont</td>
<td>Montana</td>
<td>Illinois for dual credit partnerships with community colleges</td>
<td>Idaho</td>
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<tr>
<td>North Dakota</td>
<td>Washington for Running Start courses</td>
<td>North Carolina</td>
<td>Iowa for concurrent enrollment (a.k.a. district-to-community college sharing)</td>
<td>Idaho for partnerships with four-year institutions</td>
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<tr>
<td>South Dakota</td>
<td>West Virginia</td>
<td>South Dakota</td>
<td>Kansas for Challenge to Secondary School Pupils Act courses</td>
<td>Indiana</td>
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<tr>
<td>Vermont</td>
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<td>Minnesota for concurrent enrollment courses</td>
<td>Kentucky</td>
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<td>Washington</td>
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<td>Mississippi</td>
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<td>Utah</td>
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<td>Washington for College in the High School courses</td>
<td>New Hampshire</td>
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<td>Wisconsin for Early College Credit Program courses taken at the college</td>
<td>New Jersey</td>
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<td>Virginia</td>
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*Entity identified in state policy as responsible for covering dual enrollment textbook costs (Reflects policies in effect as of June 30, 2021)*
**Key takeaways and lessons learned**

The section that follows synthesizes best practices and lessons learned from interviews with state and local stakeholders engaged in the development and dissemination of OER, including for dual enrollment courses. These best practices and lessons learned are listed in sequence from before OER adoption to post-OER adoption.

*What to know going in*

**The college must lead**

Multiple stakeholders comment that first and foremost, the college (not the high school) has to adopt the OER to ensure the resource aligns with the course’s learning objectives and reflects college-level rigor.

**Avoid mandates**

Several stakeholders recommended that state and institution-level leaders avoid forcing the use of OER, but rather provide guidance without mandates.
Be aware, make aware

Stakeholders recommended that state and institution leaders entering into efforts to support OER adoption, including for dual enrollment courses, be aware of a potential lack of information among some administration and faculty which these leaders will need to address in order for adoption efforts to gain traction. These include:

- Deans, department chairs, and faculty all need to be aware of the challenge that textbook costs pose for students, including high school students, and for broader dual enrollment course availability and access, even when these costs are borne by an entity other than students.

- Concerns about pseudo-science or outdated information in OER may make some faculty wary of OER, particularly science, computer science or technology faculty, all engaged in disciplines in which new knowledge and processes emerge regularly. To address these concerns, states and institutions need to establish processes to ensure OER reflect the most current information on a topic and are unbiased, high-level-validated, and peer-reviewed by professionals. State and institution leaders, and faculty and staff involved in the development or revision of OER, need to continually communicate and demonstrate to faculty that OER can equal if not surpass the quality and rigor of any publisher-vetted material.

- Student interaction with digital texts may likewise raise some concerns, perhaps especially among humanities faculty, who may perceive that electronic text cannot possibly provide the learning opportunities (for instance, annotation) that a print text can provide. State and institutional champions of OER adoption will need to clearly communicate that while teaching students to think deeply about text is a challenge regardless of textbook form, there are different strategies based on the form of the text to address those challenges. Alternatively, faculty uneasy about students’ capacity to interact with digital text can have OER printed at a fraction of the cost of a hard-copy textbook.

Developing support for using OER in dual enrollment

State-level communication, buy-in strategies

Multiple stakeholders noted that while OER initiatives do not necessarily need to be top-down from the state to local institutions, state-level efforts that communicate the value of OER to students, faculty and other involved parties can go a long way in building momentum for local OER implementation efforts.
Stakeholders suggested multiple strategies their states have used to facilitate communication and buy-in:

- **Include state and system-level dual enrollment partners early on to increase local stakeholder awareness and communication on the value of OER.** Colorado’s Concurrent Enrollment Advisory Board is charged by statute (C.R.S.A. § 22-35-107) with advising state and local entities on various issues related to concurrent enrollment. Towards the outset of its OER efforts, the Colorado Department of Higher Education reached out to the Concurrent Enrollment Advisory Board to make members aware (and urge them to make their constituencies aware) of the availability and benefits of OER and the Open Educational Resources Grant Program, and to educate and excite stakeholders about using OER in concurrent enrollment.

- **Provide state-supported training and a network of support for institution-embedded OER champions.** As described on page 17, the Colorado Open Education Ambassadors program provides faculty and institution staff with training on the types of resistance to OER that advocates might encounter, and how to effectively overcome that resistance. Stakeholders from Arapahoe Community College interviewed for this report noted that several staff — a combination of faculty and administration — who attended Open Education Ambassador training returned well-equipped to spread the word about OER to their colleagues across departments.

- **Adopt state policy calling for local secondary and postsecondary dual enrollment stakeholders to raise the possibility of using OER.** Top-down mandates requiring dual enrollment programs to use OER may prove unpopular with local secondary and postsecondary stakeholders. State policy that encourages dual enrollment partners establishing local partnerships to discuss the possibility of using OER might encourage broader adoption. These state-level policies could take any of several forms:
  
  - Policies similar to Texas Education Code § 28.009, which requires dual credit agreements between school districts and public postsecondary institutions to consider the use of OER in courses offered under the program.
  - Encouraging local partnerships, when creating or updating dual enrollment partnership agreements, to examine if, or the extent to which, the cost of course materials pose an economic barrier to student participation.
  - Encouraging local dual enrollment partnerships to explore strategies to reduce textbook costs.

- **Encourage conversations at state faculty meetings on the postsecondary affordability challenge that textbook costs present, and how OER can offer a solution.** Some stakeholders added that in such conversations, faculty should be urged to think about textbook costs for *all* students, not just matriculated college students.
Grassroots or a combination of top-down/bottom-up communication

Some stakeholders also identified strategies that institutional leaders, faculty and staff can use to support a grassroots approach to adoption of OER. These champions can use such strategies in tandem with state-level efforts to support a combination top-down/bottom-up approach to support the use of OER, including for dual enrollment offerings.

Regardless of whether a state or institution adopts a grassroots or combination top-down/bottom-up approach to communicating the benefits of OER and seeking buy-in, these strategies can be broadly grouped under “Potential grassroots OER advocates” and “Strategies.”

**Potential grassroots OER advocates:**

- **Institution-level** support and **department chair** buy-in can be game-changing, in tandem with state leadership support.
- **High school students** can effectively advocate for the use of OER through student government organizations.

**Strategies:**

- **Conduct:**
  - A **culture check**, to answer such questions as: What’s going on in OER at the local institution, or other institutions around the state? What has the communication been like in the past? Are there main players supporting adoption of OER? How does your institutional culture currently feel about OER, including in dual enrollment opportunities? Knowing what’s been said in the past, and how those messages have been received by the community, can be helpful.
  - An **environmental scan**, looking within the agency or institution as well as in agencies, institutions and organizations connected to them, to answer such questions as: What have individuals in agencies and institutions done around OER in the past? Where are there existing connections and potential connections?

- **Adopt a grassroots approach**, in which faculty and high school teachers see themselves as part of the solution.

- **Message** OER adoption, including in dual enrollment, as one component of a broader state or institution-level **equity, postsecondary completion** or **postsecondary affordability** initiative, rather than as a new, stand-alone initiative.

- **Communicate** to campus leadership and faculty about:
  - **The benefits of OER.** For example, rather than infringing upon academic freedom by telling faculty “We’re going to use OER,” highlight the flexibility and variability of text as a department resource. OER allow instructors to easily personalize their courses.
The potential downsides of traditional hard-copy textbooks. This may include arguments on their negative environmental impact (in landfills), the backpack weight (and related student health issues) of 10-20 pounds of traditional textbooks, and the replacement cost if a traditional textbook is lost (a student can’t lose their OER by leaving it behind somewhere).

Lastly, stakeholders need to make peace with the fact that some faculty may not buy in to adoption and implementation of OER, for a number of reasons: they may make money from the sale of their own textbook, they may have a pre-existing relationship with a publisher, or they may not be interested in revising existing OER. Stakeholders should commit to moving ahead with faculty and staff supportive of OER, and not criticize those who hold back.

Post-buy-in: State and local development/adoption, implementation strategies

Once state and institutional stakeholders are on board with OER implementation, stakeholders need to consider strategies to identify or develop OER, ensure their accessibility, and train faculty on their use in the classroom.

OER adoption or development

Stakeholders interviewed for this report recommend:

- Don’t adopt OER directly off the shelf. Just because an OER is available doesn’t ensure it’s high-quality or aligned to an institution’s learning objectives.

- Prioritize development of OER for the highest-demand courses, including dual enrollment courses.

- Apply a cohort model to support faculty collaboration in the same subject area developing a course. This can spread the workload and prevent overloading of faculty who adapt or develop courses or resources in isolation.

- If developing a full course and not just an electronic text: Ensure the course is engaging, and that the course is not simply a classroom experience dropped into an online environment.

- Offer support from instructional designers and librarians. As one stakeholder noted, states and institutions shouldn’t tell faculty to “Go swim in the sea of OER content out there.” Faculty can become overwhelmed by the number of OER options available. Librarians and instructional designers can collaborate with faculty to adopt and adapt OER to meet their needs.Forging partnerships between faculty and the institution’s Center for Teaching and Learning or Instructional Design professionals can also be helpful. On-campus experts can likewise support faculty in developing graphics and videos.
Offer faculty training in what content is readily accessible. For example, faculty training may be needed to explain Creative Commons licensing and what can and cannot be done with it. As one stakeholder observed, many faculty members assume that if content is online it’s free, or that a copyright doesn’t apply to them, neither of which is always the case.

Consider the value of combining OER with (low-cost) hard-copy supplementary texts. One stakeholder suggested that it can be helpful to combine print texts with OER, for example using a hard-copy citation style guide alongside an OER compilation of literature.

Offer participating instructors a stipend. Faculty interested in developing, adapting or remixing OER may be challenged to find time away from the classroom to do so. Faculty teaching a full course load, in particular, may struggle to find the time to develop an OER course. A stipend can help free up faculty time to create OER or remix multiple sources into a single OER resource.

In addition to faculty stipends, Central Lakes College in Minnesota has offered high school teachers stipends to facilitate their collaboration in developing and revising OER for concurrent enrollment courses during the school year. These stipends, funded by a grant from the Minnesota Service Cooperatives, helped cover teachers’ substitute teacher time, mileage traveling to and from the college campus, and time outside of the school day researching and developing OER for their courses.

Related: Ensuring OER accessibility and usability

In revising, remixing or developing new OER, states and institutions need to ensure OER usability and access. To this end, stakeholders recommended the following actions:

- Bundle OER compiled from several OER sources into a single link to a single electronic textbook rather than a set of links. Creating multiple links for a single course may make OER unusable for dual enrollment teachers — which will create resistance to the use of OER. One institution-level stakeholder noted that it’s difficult enough for instructors to adapt to a new textbook, but even harder to engage in an unfamiliar platform.

- Establish a process to ensure content is accessible to students with disabilities. For example, before the Technical College System of Georgia sends a newly developed OER course to other colleges for review, a TCSG staff member will review the course for accessibility.

- Make content mobile-friendly if possible. For some students, their cell phone may be the only way to access OER.
If making content mobile-friendly poses a challenge, it’s critical for secondary and postsecondary partners to **ensure students have out-of-school access to OER**, both in terms of 1-1 computing devices and internet access. As one stakeholder observed, you can have the best OER in the world, but it’s useless if students can’t access it outside of school.

**Faculty training and support post-OER development**

Stakeholders commented that adapting to using an electronic textbook format can be a big learning curve for students and instructors alike. To support successful classroom implementation, faculty — including those not involved in the development of OER courses, electronic textbooks, and ancillary resources — will likely need training on specific aspects of their use:

- **Training in use of electronic texts.** As one stakeholder remarked, all reading is reading, but students have a different relationship with electronic versus print texts. Faculty training can be very helpful in equipping instructors to help students (1) use electronic texts in classrooms in ways they will find approachable and useful, (2) take notes, annotate and understand digital texts, and (3) use annotation programs such as **Hypothesis**.

- **Tapping concurrent enrollment liaisons to support high school instructors’ adoption of OER.** The Colorado Community College System Concurrent Enrollment **Statement of Standards & On-Site Best Practices** calls for community colleges to provide high school instructors who teach concurrent enrollment courses (considered adjunct faculty) “with a discipline-related instructional contact/liaison to promote and support rigor and collaboration in the classroom.” At Colorado’s Arapahoe Community College, these liaisons have played an integral role in supporting successful adoption and use of OER in concurrent enrollment courses, providing effective messaging and teacher professional development.

**Post-implementation**

Stakeholders added that once OER have been implemented, continued maintenance is needed to keep resources accessible and high-quality.

**Content**

- **Create a review schedule and plan.** Particularly for OER housed in a statewide repository, a plan needs to be in place to ensure that content experts review all OER on a regular schedule (every two or three years) for accuracy as well as for alignment to current course learning objectives.
Housing content

- **Ensure capacity for growth as more content becomes available.** As more courses, electronic textbooks and ancillaries are posted to a repository, don’t assume that everything can live in the cloud. Content can live in the cloud, but stakeholders should make sure that isn’t the only place content lives.

- **Ensure a second display channel.** Stakeholders should make sure content is preserved on a second display channel, to preserve content if the primary source is vetoed or decommissioned.

Communication

- **Provide a venue for ongoing communication among state and local OER stakeholders.** For example, the OPEN FL Community hosted by the Florida Academic Library Services Cooperative has played a key communication role, letting stakeholders know as new developments are on the horizon or new grant opportunities become available, facilitating cross-institutional or cross-agency collaboration and joining messages to reach a broader audience of OER stakeholders.

Conclusion

State and institutional initiatives aimed at increasing equitable postsecondary participation and postsecondary affordability are spurring increased interest in OER as a means of offering students high-quality, no-cost OER courses, electronic textbooks and ancillaries. OER offer the potential to greatly enhance dual enrollment course access and participation, particularly in partnerships in which students are responsible for covering dual enrollment textbook costs. However, to date little research has been conducted on state and local strategies to support adoption and implementation of OER in dual enrollment programs. It is hoped this report will provide states and postsecondary institutions with valuable insights on how to begin or expand the integration of OER into dual enrollment offerings, with the goal of increasing equity in both participation and success.

Questions or Comments?

Contact Jennifer Zinth at jennifer.zinth@gmail.com
Appendix A: State Case Studies

State Approaches to Supporting OER in Dual Enrollment Courses

The section that follows summarizes key state-level approaches supporting the use of OER in dual enrollment programs in Colorado, Florida, Georgia, Louisiana, Tennessee and Texas.

Colorado
Legislation created state-level impetus

In 2017, Colorado passed S.B. 17-258 creating the Colorado Open Educational Resources Council, tasked with contracting for research on the use of OER in higher education institutions in the state and using the findings of this research to recommend initiatives to expand the use of OER, including in college courses for high school students. The following session, H.B. 18-1331 revised the duties of the Colorado OER Council and created the Open Educational Resources Grant Program within the Colorado Department of Higher Education.

Among the council’s duties are recommending policies for the spread of OER across institutions statewide, facilitating professional development and knowledge-sharing, and assisting in the operations of the Open Educational Resources Grant Program, which provides competitive grants to support the creation, adaptation and promotion of OER including for college courses offered to high school students (“concurrent enrollment” in Colorado). While grants are not exclusively for the creation of OER for concurrent enrollment courses, in making recommendations and awarding grants, the council and the Colorado Commission on Higher Education must consider whether an application “affects high-impact courses,” including concurrent enrollment courses.

This package of OER legislation has created the state-level impetus for local adoption of OER. As of May 2021, over 70 grants have been awarded over the three years of the OER Grant Program. While it’s not clear how many grants awardees explicitly referenced concurrent enrollment in their proposal, many Open Educational Resources Grant Program grants support the development of OER for general education courses, which are a core component of many local concurrent enrollment offerings in the state.

One OER grant with significant implications for general education offerings, including those offered through concurrent enrollment programs, was awarded to CCCOnline for the development of Top 40 GPathways Course Curation Guides. Defined on the Curation Guide homepage as “discipline expert-reviewed, librarian-curated OER guides for the most popular courses in Colorado,” each guide is intended to be adapted, revised and remixed with other existing OER or user-developed content. In addition, in 2021 the Colorado Community College System was awarded an OER4CTE grant to support the development of eight complete OER courses for the highest-enrollment CTE concurrent enrollment courses in the state.
In 2021, the Colorado General Assembly extended the OER Grant Program, which was scheduled to sunset, funding the program for the next five years at $1 million a year and continuing an incentive for institutions and faculty statewide to develop and enhance OER.

The state has also spurred excellence in OER through Governor Jared Polis’s Zero Textbook Challenge (ZTC) Award program. The program recognizes faculty, staff and programs for outstanding work in scaling up courses, pathways and degrees that students can complete with zero textbook costs. Institutions are required to begin coding Zero Textbook Cost courses for all courses statewide, including concurrent enrollment courses. Arapahoe Community College is among the institutions labeling all Zero Textbook Cost courses as such in its course catalog.

The Colorado Open Education Ambassadors program provides ongoing training to institution-embedded faculty and staff, to educate their peers and facilitate the development and implementation of OER.

Florida
Multiple initiatives

Rather than being spurred by a single state-level impetus, multiple initiatives in Florida have coalesced to build momentum for the adoption and implementation of OER. These initiatives build upon and align with state infrastructure advantages to maximize collaborative efforts and the dissemination of OER, with significant impact on dual enrollment student success.

State Structure

- **General Education Courses — 36 credit hours total, 18 core credits**: Through a 2012 amendment to Section 1007.25 of the Florida Statutes, faculty committees recommended approximately 30 general education core courses. Students must complete at least one identified course from each of the general education subject areas (communication, mathematics, social sciences, humanities and natural sciences), which gives students eighteen credit hours, all of which are guaranteed to transfer to any Florida public institution unless exempted under law. Given this requirement, most dual enrollment course offerings and student selections are General Education Courses.

- **FL Dual Enrollment**: In recent years the cost of textbook and course materials for dual enrollment courses has shifted from the school districts to the course-providing institutions, which has greatly increased the focus on converting these courses to low-cost or OER materials.

Florida Virtual Campus

- **Orange Grove**: The nation’s first state-level OER repository unfortunately was shut down in 2020 due to a discontinuation of legislative funding. However, the program launched efforts to provide a variety of Florida OER offerings to foster cross-sector collaborations, including dual enrollment courses.
- **FL OER Summit**: Annually draws speakers and attendees from across the U.S.; sessions have featured dual enrollment faculty and students’ experiences with OER.

- **OPEN FL Community**: The aim of OPEN FL is to “provide and promote quality and affordable access to Florida higher education by creating a consortium of Florida colleges and universities to collaborate on developing, implementing, and providing discovery to open educational resources (OER) throughout high-impact degree pathways.”

- **TAOERSC**: This committee works to advise and collaborate regarding development, adoption, recommendation and use of affordable textbooks and OER in Florida’s public colleges and universities by identifying and sharing current trends and best practices, with an emphasis on the role of the academic library. This committee has been critical in identifying OER materials relevant for dual enrollment courses.

- **Zero Textbook Cost Indicator**: Building on previous FLVC textbook affordability efforts, a 2021 workgroup was convened with representatives from Florida’s colleges and universities to brainstorm, define and provide best recommendations to implement textbook cost indicators in the FloridaShines Course Catalog. Starting this year, students from across the state and nation can quickly search for online courses from across Florida with Zero Textbook Costs, allowing dual enrollment students to easily select ZTC courses for their degree completion requirements.

**Complete Florida Initiative**

- **OER Course Grants**: The Complete Florida Initiative, while not focused exclusively on broadening the use of OERs, offered funding directly to community colleges, which resulted in the creation of some OER dual enrollment course offerings. As with Orange Grove, state funding of the Complete Florida Initiative was discontinued in 2020.

**Florida Board of Governors**

- **Top 10 dual enrollment**: The Florida Board of Governors reached out to FLVC to identify and offer OER for the ten dual enrollment courses with the highest enrollment — primarily General Education Courses — and to make them publicly available for promotion to faculty and students.

- **Statewide OER Group**: The Board of Governors has the ability to reach district administrators, central office staff, and teachers to inform them of the availability of these resources and help them promote these options for students.

**Individual Colleges and Universities**

- **Affordability Counts**: Created as a direct response to the increasing costs of textbooks in higher education. Courses with educational resources under $40 may be listed on their site. Dual enrollment students can use this site to identify low-cost courses, many of which use OER, at participating Florida institutions.
Florida Course Share: An initiative that uses Canvas Commons for sharing course materials created and donated by instructors from across the Florida State University System. This initiative hopes to gather OER course packs for all Florida courses, especially in general education, into OER Commons to facilitate further adoption across institutions.

Textbook Affordability Reports: Yearly reports detailing local textbook affordability activities, including OER efforts, by institution. Many of these reports have detailed dual enrollment textbook costs and efforts to convert these courses to OER, as well as state and student cost savings.

Statewide OER Leaders Group

Spearheaded by the Florida Virtual Campus — Library Services Director of Digital Services and OER, the Statewide OER Leaders Group supports individuals leading OER efforts in states nationally by sharing resources, messaging and communication through a listserv and quarterly meetings.

Georgia

Cohort-based OER development training model

While institutions around Georgia had been engaged in OER initiatives for some time, the 2015 passage of the Dual Enrollment Act infused OER into dual enrollment offerings. Among other changes, the Dual Enrollment Act replaced the state's existing multiple dual enrollment funding models with a single model under which participating postsecondary institutions were required to accept an annual state allocation as "full payment for tuition, mandatory and noncourse related fees, and course books[.]") The legislation resulted in sudden and significant increases in dually enrolled students at the same time that state allocations to institutions to cover dually enrolled students’ tuition fell short of covering these and other program costs. This convergence of sudden enrollment growth and a financial challenge impelled institutions to take a greater interest in adopting OER, particularly for high-demand courses using high-cost textbooks.

The Technical College System of Georgia Open Tech cohort-based training model has made high-quality OER courses available at all 22 colleges in the TCSG system. In the model, an educational technologist works over a 14-16-week period with eight to 15 faculty who are subject-area experts in a specific discipline representing TCSG institutions around the state.

Participating faculty receive training on developing a full OER course and ancillary resources such as PowerPoints or graphics, either by building their own OER, curating from other sources, or applying a hybrid approach (requiring students to purchase one resource but offering the rest as OER). The educational technologist working with the faculty member develops a crosswalk for each OER course they develop, allowing users to locate content associated with a specific learning outcome in their course. Post-training, faculty are encouraged to share their newly gained OER expertise with their peers within their own institution or other institutions around the state.

1 Ga. Code Ann., § 20-2-161.3
Completed Open Tech courses are housed on a system-level website; faculty at any of the TCSG colleges work with their distance education coordinator to download any course package they wish to download. Although the focus to date has been on the development of OER for general education courses, TCSG is increasingly interested in developing OER materials (not full OER courses) for some career and technical education programs, such as early childhood education, for which fewer OER resources exist.

**Louisiana**

**Cohort approach to develop OER for dual enrollment courses**

For several years, the Louisiana Board of Regents and institutions have been using Board of Regents funds and institutions’ library staff to increase the availability of postsecondary OER. In 2020, the Louisiana Library Network and the Louisiana Board of Regents were selected to receive a $2 million Fund for the Improvement of Postsecondary Education grant from the U.S. Department of Education. The funds will support a three-year initiative, launched in January 2021, to develop interactive OER for priority dual enrollment courses that will be available throughout Louisiana and nationally.

The approach will consist of 25 teams, each composed of a librarian project manager and five faculty members. The state has selected 25 priority courses in which 250,000 Louisiana dually enrolled and matriculated students enroll each year. Emphasis was placed on courses with high rates of course failure or non-completion, and general education courses most impacting racially minoritized students. The project goal is to increase the percentage of students who enroll and successfully complete these courses, while decreasing DFW rates.

In May 2021, each team’s library project manager began leading their team through a summer faculty training experience. In August 2021, each team began developing one of 25 OER courses, using existing OER. In May 2022, each course will be reviewed by high school instructors and online course designers.

**Tennessee**

**OER developed as foundational text for each statewide dual credit course**

Tennessee offers a few models through which high school students may complete college courses (outside of an early college high school model). Under the statewide dual credit model, 11 general education and career and technical education courses are taught in high schools by approved high school instructors. Common learning objectives have been developed for each course by a

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1 Under the “dual enrollment” model, courses are taught by a college instructor or high school teacher who meets adjunct instructor qualifications set by the college or university. Dual enrollment credits transfer to most institutions in the same manner as transfer credits earned by traditional college students. Students earn college credit upon successful course completion. Under the “local dual credit” model, one college or university and one school district enter into a local agreement to offer college courses to high school students. These courses may be taught by a college faculty member or high school teacher, but tend to articulate for credit only at the partnering postsecondary institution. Students may need to pass a challenge exam in order to earn college credit.
team of college faculty. Upon completing a statewide dual credit course, students must pass an online challenge exam to earn college credit. Credit transfers to all public two- and four-year institutions.

Previously, the state offered a list of recommended texts for use in each statewide dual credit course. However, some stakeholders wondered if relatively low pass rates on challenge exams could be attributed in part to the fact that no textbook was designated as a foundational text for each course.

Tennessee faculty have been redesigning learning objectives for each statewide dual credit course to align not only with what they would teach in their course but with OER texts. The state will be rolling out OER textbooks for the first group of statewide dual credit courses in the 2021-22 school year. Teachers will be trained on using OER texts, and, as applicable to a particular course, ancillary resources such as test banks and PowerPoints.

Other statewide dual credit courses will be redesigned in summer 2021 so that by the 2022-23 school year, Tennessee will have the first statewide initiative offering OER for all dual credit courses in a program.

**Texas**

**Statewide OER repository, and required discussion of use of OER in dual credit offerings**

In 2017, the Texas Legislature approved S.B. 810 (codified as Texas Education Code 61.0668), creating the Open Educational Resources Grant Program. As noted in the enabling legislation, the program is established to "encourage faculty at institutions of higher education to adopt, modify, redesign, or develop courses that use only open educational resources."

For the first round of grants in 2018, awardees received up to $8,000 for one course or up to $16,000 for multiple courses and either adopted, adapted or created materials and uploaded them to the OERTX Repository. For the second round in 2020, the program was redesigned to award grants for implementation (up to $5,000) and development (up to $25,000).

Per regulation (19 TAC § 4.236), award criteria must include, among other factors, the number of students projected to enroll annually in the course and the projected amount of money students would save by using OER for the course. Per the most recent Request for Applications, course types for which faculty may apply for grants to develop new OER or facilitate course redesign to use existing OER include Texas Core Curriculum courses — lower-division courses that must be recognized for transfer by other public institutions in the state. Dual credit courses are also eligible.
To date, most program grants have been awarded for core transfer courses; few have been explicitly for dual credit courses. Once completed, OER textbooks and materials are uploaded to the statewide OERTX repository. The repository likewise facilitates innovation, allowing users to create a group to work collectively on specific content, or create a group to discuss pedagogy.

Most recent grants have included a reporting requirement that the grantee collect qualitative student and faculty data on their experiences using OER.

As of summer 2021, Texas is the only state that requires secondary and postsecondary partners entering into dual credit agreements to discuss the possible use of OER. Specifically, any dual credit agreement between a school district and a public postsecondary partner must “require the district and the institution to consider the use of free or low-cost open educational resources in courses offered under the program” (Texas Education Code § 28.009(b-2)(9)).

**Appendix B: State policies governing dual enrollment textbook costs**

*No source listed for states in which policy is silent*

**Alabama:** Alabama CCS Chancellor’s Procedure for Policy 801.03: Admission: Dual Enrollment/Dual Credit for High School Students (updated June 2020)

**Alaska:** Alaska Board of Regents Policy R10.05.015

**Arkansas:**
- Concurrent enrollment: ADHE Concurrent Enrollment Policy
- Support for low-income students: A.C.A. § 6-16-1204(e)(3)(A)

**California:**

**Colorado:**
- Concurrent enrollment: C.R.S.A. § 22-35-104, 22-35-113
- Concurrent enrollment expansion and innovation grant program: C.R.S.A. § 22–35–114

**Delaware:** Support for low-income students: 14 Del. Admin. Code 506; 2021 H.B. 250 (line item supporting college access programs, which includes financial support to districts enrolling low-income students in dual enrollment courses)

**Florida:** F.S.A. § 1007.271(17), (21)(n)

**Georgia:** Ga. Code Ann., § 20-2-161.3(j)(3)

**Hawaii:** GEAR UP scholarship for low-income students: Hawaii Department of Education GEAR UP Hawaii Running Start financial aid webpage

Iowa:
- PSEO: I.C.A. § 261E.7
- Concurrent enrollment (a.k.a. district-to-community college sharing): Iowa Code 261E; 281 — IAC 22

Kansas:
- Concurrent enrollment partnerships and tiered technical courses: Kansas State Board of Regents’ Policy Manual, Chapter III, A, 13, Concurrent Enrollment of High School Students in Eligible Public Postsecondary Institutions through Concurrent Enrollment Partnerships

Louisiana:
- Dual Enrollment: LA Board of Regents, AA 2.22 – Dual Enrollment - FAQ, September 2019
- Dual Enrollment Innovation and Equity Grant: LSA-R.S. 17:2944

Maine: 20-A M.R.S.A. § 4775

Maryland: Support for low-income students

Michigan:
- Public school students in Postsecondary Enrollment Options and Career and Technical Preparation Act courses: M.C.L.A. 388.1621b; M.C.L.A. 388.514(4), (5); M.C.L.A 388.1904(5)
- Private school students enrolled in Postsecondary Enrollment Options and Career and Technical Preparation Act courses: M.C.L.A. 388.514(6), M.C.L.A 388.1904(6)

Minnesota:
- Postsecondary Enrollment Options: M.S.A. § 124D.09, Subd. 19, 20
- Concurrent enrollment: Minnesota State System Procedure 3.5.1 Post-Secondary Enrollment Options (PSEO) Program, Part 6, Subpart A, 4, 6


Missouri: V.A.M.S. 167.223


New Mexico: N.M. Admin. Code 6.30.7(8)(H)(15)

North Dakota:
- North Dakota State Board of Higher Education Procedure Manual, Procedure 469, effective August 1, 2021
- Bank of North Dakota Dual Credit Assistance Application

Ohio: R.C. § 3365.07(A)(1)(b), (A)(2)

Rhode Island: Textbook Commissioners’ Review Decision, Summer 2016

South Carolina: S.C. Code of Regulations R. 43-234(III)(C)

South Dakota: South Dakota Board of Regents Academic Affairs Guidelines, Section 7, Dual Credit, Credit by Exam, and Placement, 5.3.2.2, last revised May 2021

Texas: V.T.C.A., Education Code § 28.009(b-2)(5)

Utah: U.C.A. § 53E-10-305

Vermont:
- Vermont Agency of Education FY 21 Dual Enrollment Program Manual (pages 9, 14, 24, 27)
- Need-based stipend program for dual enrollment and early college students: 2021 H. 439

Washington:
- Running Start: WAC 392-169-060
- College in the High School: WAC 392-725-050; Office of the Superintendent of Public Instruction report Covering the Costs of Dual Credit for Students and Families (2019)
- Dual Enrollment Scholarship Pilot Program (as amended by 2021 S.H.B. 1302): RCW 28B.76.730
- Academic Acceleration Incentive Program: RCW 28A.320.196


Wisconsin:
- Start College Now: W.S.A. 38.12(14)(d)
- Early College Credit Program (courses offered at HS): W.S.A. 118.55(5)(a)
- Early College Credit Program (courses offered at college): W.S.A. 118.55(5)(d)(1)

Wyoming: W.S. § 21-20-201(d)
Appendix C: Notes on select state policies governing dual enrollment textbook costs

**Arizona:** Agreements such as intergovernmental agreements between community college districts and school districts can determine dual enrollment textbook costs, but these are not state-level policies.

**California:** For College and Career Access Pathways, statute requires that students not be assessed any “fee,” including textbook expenses.

**District of Columbia:** The [Dual Enrollment Scholarship Funding Opportunity](#) offers successful applicant IHEs an anticipated "$565 per student, per course to cover tuition, books, fees, and transportation." A total of $150,000 is available for 2021-22.

**Florida:** While the local dual enrollment agreement between the school district and postsecondary institution must delineate costs incurred by each entity, dual enrollment instructional materials must be made available at no cost to public school students. Florida College System institutions are permitted to provide instructional materials at no cost to private school and home school students.

**Georgia:** The legislature makes an annual appropriation to support the state’s dual enrollment program. Per statute, each eligible postsecondary institution must "enter into a participation agreement with the [Georgia Student Finance Commission] agreeing to: "Provide course books to eligible high school students participating in the program taking eligible dual credit courses at no charge to the student... Accept the amount paid by the commission as full payment for tuition, mandatory and noncourse related fees, and course books for eligible high school students taking eligible dual credit courses." An institution must cover any additional costs, including textbook costs, not covered by the annual appropriation. Per May 2020 FAQs, after a student reaches 30 semester hours or 45 quarter hours, the institution may charge the student a prorated amount of tuition and book costs not covered by state funding.

**Illinois:** For partnerships between school districts and community colleges using the [Model Partnership Agreement](#):

- For Type A or Type B courses (taught at a high school by a high school instructor or faculty member, respectively), the district pays textbook costs.

- For Type C courses ("taught online, taught via distance learning, co-taught by a District teacher and College faculty member, or other hybrid models of other Types"): "subject to Local Agreement."

- For Type D courses (taught at the college or a satellite location): "the District may elect to either purchase such items on behalf of students, or have the students purchase textbooks and materials in accordance with standard College policies."
For partnerships with four-year institutions: In practice, the secondary and postsecondary partner determine which entity (possibly student, possibly not) will cover textbook costs.

**Iowa PSEO:** While statute requires the district to pay $250 per student per course for tuition, textbooks and other course expenses, in practice, the postsecondary institution absorbs all course costs not covered by the $250.

**Louisiana:** [2020 H.B. 734](https://legis.la.gov/Document.aspx?DocTypeID=2&SessionYear=2020&BillNumber=734), which creates the Dual Enrollment Innovation and Equity Grant program, provides that one of the principles that should "guide dual enrollment access and capacity building" is "Before graduating from high school, every student should be able to enroll in at least four dual enrollment courses for which they are eligible, with no tuition or fees charged to the student and minimized cost of attendance expenses such as textbooks and other instructional materials, testing, and transportation costs."

**Massachusetts:** Commonwealth Dual Enrollment Partnership program students demonstrating financial need may receive assistance to cover textbook costs. In practice, most participating campuses cover all participating students’ textbook costs, not just the textbook costs of students demonstrating financial need.

**Michigan:** For public school students, unless otherwise agreed by the postsecondary partner (for Postsecondary Enrollment Options) or career and technical preparation program (for Career and Technical Preparation Act courses) and the district, after the institution’s drop/add period for the course, the postsecondary partner or career and technical preparation program must send a bill to the eligible student’s school district detailing the eligible charges for each eligible course in which the eligible student is enrolled.

For private school students in both programs, the institution or career and technical preparation program must send a bill to the department of education detailing the eligible charges for each eligible course in which the eligible student is enrolled. The department must determine the amount of the eligible charges to be paid by the department of treasury to the career and technical preparation program on behalf of the eligible student.

Public school students enrolled in college courses through the Postsecondary Enrollment Options Act or the Career and Technical Preparation Act are responsible for covering expenses that exceed the amount the district or state is required to pay.

**Nebraska:** The Access College Early Scholarship Program does not cover textbooks. The program covers up to $250 in tuition and fees per term for applicant students whose families’ annual household income is at or below 200% of the federal poverty level.

**North Carolina:** Local exceptions to the statewide policy established in the North Carolina Community Colleges Curriculum Procedures Reference Manual may exist. [Section 14, Career and College Promise](https://www.ccweb.org/), of the Curriculum Procedures Reference Manual encourages students to “check with their principal or counselor to verify how these costs are paid.”
**Pennsylvania:** State-level program is currently inactive due to inadequate state funds.

**South Carolina:** Per state policy, “Tuition costs and any other fees are the responsibility of the individual student or his or her parent(s) or legal guardian unless otherwise specified in local school district policy.”

**South Dakota:** For concurrent enrollment courses, “The student is ultimately responsible for obtaining all required textbooks and supplies necessary to complete the course.” However, “The textbooks for students participating in concurrent enrollment course(s) may be provided by the high school per local school/school district policy.”

**Washington:** While local College in the High School agreements must determine the entity or entities responsible for covering textbook costs, students cannot be required to pay for textbooks.

**West Virginia:** Series 19 of West Virginia Higher Education Policy Commission Policy provides: “All high school students must be charged the special tuition or the regular tuition/fees approved for the institution granting the credit. The credit-granting institution may use tuition/fee waivers or third party sponsors to support the student’s cost of the course.”

**Wisconsin:** While local agreements governing Early College Credit Program courses taken at the college must determine the entity or entities responsible for covering textbook costs, students may not be charged textbook costs.

**Wyoming:** While local agreements between secondary and postsecondary partners must specify the entity or entities responsible for covering students’ concurrent enrollment textbook costs, students may not be charged for such textbooks.