



# Georgia Department of Audits and Accounts Performance Audit Division

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## Why we did this review

This follow-up review was conducted to determine the extent to which the Georgia Student Finance Commission (GSFC) and the General Assembly addressed recommendations from our January 2018 special examination (Report #17-09).

The examination reviewed GSFC's practices regarding dual enrollment. We found that the program lacked clearly defined goals and objectives needed to measure program success and assess its cost-effectiveness. Multiple entities collected data on dual enrolled students, resulting in a lack of consistent data elements needed to evaluate the program. In addition, GSFC lacked access to students' course records to ensure compliance with program requirements and to assess student outcomes.

## About dual enrollment

Since 1992, dual enrollment programs have allowed Georgia high school students to take postsecondary courses and earn both high school and college credit for the same course at no cost to the student. GSFC administers dual enrollment, which is available to certain students pursuing dual credit in core academic and career and technical education courses at participating postsecondary institutions. In fiscal year 2020, the General Assembly appropriated \$100.8 million in state general funds to cover the cost of tuition for approximately 60,000 dual enrolled students.

## Follow-Up Review Dual Enrollment Program

### Legislation and agency fully address recommendations

#### What we found

The General Assembly passed, and the Governor signed House Bill 444 during the 2020 legislative session that revised the dual enrollment law and addressed recommendations in our 2018 special examination of the Dual Enrollment Program. The law now includes goals for the program, expands Georgia Student Finance Commission's (GSFC) oversight functions to ensure compliance with program regulations, and designates responsibility for collecting data and evaluating the program to GSFC. The bill also addresses the program's rising costs by limiting eligibility. In addition, changes to GSFC regulations since 2018 have improved GSFC's access to data useful for monitoring and evaluating program effectiveness.

*Goals and Objectives:* As recommended, HB 444 clarifies the intent of dual enrollment by establishing goals aimed at increasing high school graduation rates and reducing postsecondary educational costs. Neither statute nor GSFC policies specified desired outcomes of dual enrollment at the time of our 2018 review.

*Data Collections and Evaluations:* In 2018, we found that no single entity was deemed responsible for ensuring dual enrollment data was accurately and consistently reported and compiled. As recommended, HB 444 designates GSFC responsibility for collecting dual enrollment data and evaluating the success of the program. GSFC revised its regulations to require all participating postsecondary institutions to submit transcript data for dual enrolled students to its College HOPE Eligibility Calculation Service (CHECS). This includes those private institutions that

were not submitting student record data to GA-AWARDS (the state's longitudinal data warehouse) at the time of our review.

*Expenditure Controls:* Following the release of our 2018 report, GSFC took steps to improve its access to quality student data to improve its oversight capabilities. At the time of our original review, we noted that GSFC lacked access to course records necessary to fully ensure the accuracy of the dual enrollment payments and to review individual student participation in dual enrollment across multiple institutions. Currently, student transcripts submitted by postsecondary institutions through CHECS give GSFC access to student course record data needed to verify accuracy of payments and assess compliance with program policies. In addition, GSFC's redesigned dual enrollment funding application launched in March 2020 is expected to improve the accuracy and completeness of dual enrollment data.

The General Assembly took significant steps to control dual enrollment costs. HB 444 revises provisions relating to eligible high school students, provides for certain eligible dual credit courses, and establishes a total maximum number of semester hours dual enrolled students can be funded for.

- **Eligible students** – include students enrolled in 11<sup>th</sup> or 12<sup>th</sup> grade at an eligible high school, or students enrolled in 10<sup>th</sup> grade who meet certain qualifications.
- **Eligible courses** – include core courses (English, math, science, social studies, or foreign languages) or Career, Technical, and Agricultural Education (CTAE) courses included in the eligible course list maintained by GSFC.
- **Credit hours** – Credit hour caps established by the bill are as follows:
  - Eligible high school students with 18 or fewer semester hours, or the equivalent amount of quarter hours, of dual credit courses funded on or before June 30, 2020 are limited to 30 total semester hours, or an equivalent amount of quarter hours, of dual credit courses.
  - Eligible high school students with 19 or more semester hours, or the equivalent amount of quarter hours, of dual credit courses funded on or before June 30, 2020 are limited to 12 additional semester hours, or the equivalent amount of quarter hours, of eligible dual credit courses.

Though our 2018 report did not recommend changes to admissions criteria for dual enrolled students, we noted that the criteria varied by postsecondary institution and course. Since our review, some public and private institutions have revised admissions criteria to improve consistency.

*GSFC Response:* In its response to the report, GSFC agreed with the current status of the Commission's dual enrollment program efforts as presented in the report.

The following table summarizes the findings and recommendations in our 2018 report and actions taken to address them. A copy of the 2018 special examination report 17-09 may be accessed at <http://www.audits.ga.gov/rsaAudits>.

<b>Dual Enrollment Follow-Up Review, June 2020</b>	
<b>Original Findings/Recommendations</b>	<b>Current Status</b>
<p><b>What are the goals and objectives of the Dual Enrollment program?</b></p> <p>We recommended that the General Assembly consider adding defined goals and objectives for the Dual Enrollment program into its relevant statute (O.C.G.A § 20-2-161.3.)</p>	<p><b>Fully Addressed</b> – During 2020 legislative session, the General Assembly passed HB 444, which clarifies the intent of dual enrollment by adding specific goals.</p> <p>HB 444 amends O.C.G.A § 20-2-161.3, stating that the dual enrollment program is to “promote and increase access to postsecondary educational opportunities for Georgia high school students while increasing high school graduation rates, preparing a skilled workforce, and decreasing time and cost to postsecondary credentials.” As noted below and on page 4, GSFC reported that it plans to develop performance measures to track progress towards meeting these goals.</p> <p>HB 444 becomes effective on July 1, 2020 and will apply to students enrolling in the Dual Enrollment Program beginning Summer 2020.<sup>1</sup></p>
<p><b>Do participating state agencies collect the information necessary to assess program effectiveness?</b></p> <p>We recommended that the General Assembly consider identifying a single state agency or group to compile dual enrollment data from the various participating parties and to measure and report on the success of the Dual Enrollment program. This agency should be charged with ensuring the consistency and accuracy of dual enrollment data.</p> <p>We also recommended that the General Assembly consider establishing in statute the requirement that all postsecondary institutions participating in the Dual Enrollment program submit student record data to GA-AWARDS. Additional provisions may need to be made to allow the data to be shared with other state entities.</p>	<p><b>Fully Addressed</b> –HB 444 designates GSFC as the entity responsible for collecting dual enrollment data and evaluating the success of the program. In addition, GSFC established processes for collecting student enrollment and transcript data from all participating postsecondary institutions.</p> <ul style="list-style-type: none"> <li>• HB 444 gives GSFC responsibility for collecting and monitoring enrollment and student record data for eligible dual enrollment courses. The bill also requires GSFC to annually measure and evaluate the Dual Enrollment program, a responsibility previously held by the Governor’s Office of Student Achievement (GOSA). According to GSFC, it plans to develop performance measures based on the goals established in HB 444 and use data collected from postsecondary institutions to evaluate and report on program performance. While GSFC anticipates utilizing its College HOPE Eligibility Calculation Service (CHECS) as a primary source of data for tracking the program’s progress toward meeting goals, management indicated they will also rely on data from other state sources such as GA-AWARDS. It should be noted that HB 444 transfers GA-AWARDS from GOSA to the Office of Planning and Budget.</li> <li>• Revised GSFC regulations now require <u>all</u> postsecondary institutions participating in the Dual Enrollment program to use CHECS to report transcript data, including all courses attempted, once final grades have been posted at the end of each term. Although CHECS was implemented prior to the passage of HB 444, the student transcript data housed in the system provides GSFC information necessary to meet data collection and evaluation requirements included in the legislation. In addition to course information, postsecondary institutions must report student demographic information, credit hours, grade, postsecondary institution, high school, and whether the course counts towards a degree. GSFC plans to</li> </ul>

<sup>1</sup> The Governor signed HB 444 bill into law on April 28, 2020.

<b>Dual Enrollment Follow-Up Review, June 2020</b>	
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	<p>utilize the data to measure the success of the dual enrollment program.</p> <ul style="list-style-type: none"> <li>To improve the accuracy and completeness of data, GSFC redesigned the web-based dual enrollment funding application to improve functionality and incorporate programmatic changes resulting from HB 444. The application, which is completed by students and approved by high school counselors and participating postsecondary institutions, is an important source of data to evaluate effectiveness of dual enrollment, as well as compliance. However, our 2018 report identified inconsistencies in the application data that could have inhibited accurate evaluation of dual enrollment. Now that CHECS is integrated with the funding application and invoice system, GSFC is now able to match course records with applications to identify unapproved courses and consistently identify students in course records reported in CHECS and the invoice system using a common identification number.</li> </ul> <p>In addition to enhancements to the application system, GSFC no longer accepts paper applications which allows it to collect more uniform data. Although GSFC activated the redesigned online application in March 2020, final enhancements were expected to be in place by May 2020.</p>
<p><b>What is the total state cost of Dual Enrollment?</b></p> <p>The examination's analysis was designed to estimate the total amount of state funds that would be spent on dual enrollment in fiscal year 2018 by considering three funding streams – the annual Dual Enrollment appropriation, USG and TCSG enrollment-based appropriations, and the Georgia Department of Education's QBE appropriation.</p>	<p><b>No recommendation</b> – This informational finding did not include recommendations.</p> <p>The analysis to calculate the total dual enrollment funding from all state funding sources was not updated as part of this follow-up.</p> <p>While we did not calculate the total cost, changes resulting from the passage of HB 444 are expected to slow the rising cost of dual enrollment. As previously noted, HB 444 limits dual enrollment costs by redefining the types of students and courses eligible for dual enrollment funding. In addition, students are limited in the number of credit hours that can be funded under dual enrollment. The bill also limits the number of courses students can retake. In general, students who withdraw from two dual enrollment courses will become ineligible to participate in the program.</p> <p>It should also be noted that the General Assembly eliminated transportation grants in fiscal year 2019. The grants helped fund the transportation of dual enrollment students from their high school to their respective postsecondary institutions.</p>
<p><b>Has GSFC implemented adequate controls to limit state expenditures?</b></p> <p>We recommended that GSFC consider obtaining and reviewing student course record data to assist them with ensuring postsecondary institutions' compliance. Due to the sensitive nature of student level data, additional steps may be necessary to obtain access.</p>	<p><b>Fully Addressed</b> – HB 444 expands GSFC's oversight functions and places restrictions on dual enrollment participation to control program costs. In addition, GSFC established processes for collecting data necessary for ensuring compliance and revised regulations to require all participating postsecondary institutions to report data.</p> <p><u>GSFC Oversight</u> - Both GSFC and the General Assembly took action to improve oversight of the dual enrollment program. HB 444 requires that GSFC review high schools' compliance with program rules and regulations and institute corrective actions for certifying ineligible students. To comply with HB 444, GSFC plans to</p>

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<p>We also recommended that the General Assembly consider limiting the total number of dual enrollment credit hours per student per term in a manner similar to limitations established for the HOPE scholarship.</p>	<p>incorporate review of data from high schools in its compliance reviews.</p> <p>With the implementation of CHECS in 2018 following our review, GSFC has immediate access to student-level course data necessary to assess postsecondary institutions' compliance. GSFC revised program regulations to require participating postsecondary institutions to use CHECS to report transcripts (student course records) for dual enrolled students at the end of each term. GSFC reported that it also began piloting remote compliance reviews in January 2020 to improve the efficiency of the compliance review process and to reduce travel costs.</p> <p><u>Excessive Dual Enrollment Participation</u> - Both the General Assembly and GSFC took steps to limit state expenditures for dual enrollment:</p> <ul style="list-style-type: none"> <li>• In 2018, GSFC revised program regulations to clarify existing rules that limit students to a total of 15 hours of dual enrollment aid per semester <u>across all institutions</u>.</li> <li>• HB 444 defines an eligible student as those students enrolled in 11th or 12th grade. Students in 9<sup>th</sup> grade are no longer eligible and students in 10<sup>th</sup> grade are eligible only under certain circumstances.<sup>2</sup> GSFC has initiated revisions to its web-based funding application to incorporate the new eligibility criteria to limit program expenditures by ensuring that only eligible students participate in the program.</li> <li>• HB 444 defines eligible courses as core courses (English, math, science, social studies, or foreign languages) or Career, Technical, and Agricultural Education (CTAE) courses included in the eligible course list maintained by GSFC.</li> <li>• HB 444 also limits students to a maximum of 30 semester hours of dual enrollment aid. However, the bill does not prevent students from enrolling in additional dual credit courses at their own expense.</li> </ul>
<p><b>What are the postsecondary institutions' Dual Enrollment admission criteria?</b></p> <p>The examination's analysis was designed to identify minimum entrance criteria for Technical College System of Georgia (TCSG), the University System of Georgia (USG), participating private institutions, and the Georgia Military College.</p>	<p><b>No recommendation</b> – This informational finding did not include recommendations.</p> <p>As an update, several postsecondary institutions made modifications to admission criteria. USG reported that, in efforts to allow its institutions to consider students that had not taken the SAT/ACT, institutions began accepting Accuplacer scores in summer 2019. TCSG decreased the minimum ACT score required for students seeking a degree. Similarly, at least one private institution decreased the minimum ACT and SAT scores required for admission.</p> <p>The analysis from the original report was not updated as part of this follow-up.</p>

<sup>2</sup> Students entering 10<sup>th</sup> grade will be eligible to receive dual enrollment funding if they: 1) received dual enrollment funding as a ninth grader, 2) scored a minimum 1200 SAT score or 26 ACT composite score, or 3) enrolled in an eligible Career Technical and Agricultural Education course at a TCSG institution.

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<p><b>What percentage of dual enrollment coursework was accepted for postsecondary credit?</b></p> <p>The examination's analysis was designed to identify: 1) the percent of dual enrollment students that enrolled in a TCSG or USG institution after 12th grade and 2) the percent of dual enrollment credit hours that were invoiced and paid by GSFC for these students that were subsequently accepted for postsecondary credit by USG or TCSG institutions.</p>	<p><b>No recommendation</b> – This informational finding did not include recommendations.</p> <p>As an update, GSFC anticipates that it will track the extent to which dual enrollment course credits are accepted by postsecondary institutions as transfer credits. This type of information will be necessary to evaluate the impact of dual enrollment participation on the time and cost to earn postsecondary credentials. GSFC expects that the transcript data it obtains through CHECS, as well as data obtained from other sources (e.g., GA-AWARDS), will be necessary to conduct these types of analyses. According to GSFC, CHECS does not currently provide all of the longitudinal student data necessary for such analyses.</p> <p>The analysis from the original report was not updated as part of this follow-up.</p>
<p><b>6 Findings</b></p>	<p><b>3 Fully Addressed</b>  <b>0 Partially Addressed</b>  <b>0 Not Addressed</b>  <b>3 No Recommendation</b></p>

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The Performance Audit Division was established in 1971 to conduct in-depth reviews of state-funded programs. Our reviews determine if programs are meeting goals and objectives; measure program results and effectiveness; identify alternate methods to meet goals; evaluate efficiency of resource allocation; assess compliance with laws and regulations; and provide credible management information to decision makers. For more information, contact us at (404)656-2180 or visit our website at [www.audits.ga.gov](http://www.audits.ga.gov).