

## THE HIGHER EDUCATION PITFALL: WASTING CREDITS LEADS TO WASTEFUL DEBT

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*As the national student debt total balloons to \$1.2 trillion, solutions are required. One such solution comes in the form of accelerated learning programs such as dual enrollment, Advanced Placement, and International Baccalaureate courses, which allow students to earn college credit while they are still in high school. This provides an avenue for students to complete college early, take fewer credits at the college level, and ultimately save themselves from enormous amounts of debt that would likely encumber them as they entered the workforce. Taking full advantage of these programs, however, is often disrupted by institutions that deny or limit the transfer of these credits, which can result in redundancy of education and the loss of cost-saving benefits. This Note analyzes current programs, institutions of higher education, and policy solutions. This Note then argues that a uniform standard must be implemented for all colleges and universities which rewards college-bound students for successful completion of college-level courses by equally granting them credits based on their level of achievement and how that can most effectively be achieved. Such changes will enhance equality of access to programs and acceptance of credit by all universities.*

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## I. INTRODUCTION

The United States currently faces an education crisis in the form of an ever-increasing \$1.2 trillion national student debt total.<sup>1</sup> With the student-loan debt of a 2014 college graduate averaging \$33,000, the demand for reducing the cost of college attendance is knocking on policy-makers' doors.<sup>2</sup> Meanwhile, accelerated learning programs such as dual enrollment, Advanced Placement ("AP"), and International Baccalaureate courses ("IB"), which allow students to earn college credit while in high school and thereby provide a financial incentive for early college completion, are rapidly becoming more popular in the secondary-school forum.<sup>3</sup> However, the acceptance of credits earned through these programs is largely left to the discretion of higher education institutions.<sup>4</sup>

With an increasing number of policy-makers and students realizing the reduction in the cost of college available through dual-credit opportunities, the issue falls on higher education institutions to deny or limit the transfer of these credits.<sup>5</sup> This power of discretion results in redundancy of general education and eradicates the cost-reduction benefit of bypassing prerequisite college courses to reduce the time for degree at-

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1. According to the Federal Reserve, as of June 2015, there is an outstanding student-loan debt of \$1.272 trillion. FED. RESERVE, STATISTICAL RELEASE: G.19 CONSUMER CREDIT 2-3 n.11 (2015), <https://www.federalreserve.gov/releases/g19/20151007/g19.pdf> (including all "student loans originated under the Federal Family Education Loan Program and the Direct Loan Program; Perkins loans; and private student loans without government guarantees").

2. See *Students & Debt*, DEBT.ORG, <https://www.debt.org/students/> (last visited May 31, 2017).

3. LAUREN CASSIDY ET AL., DUAL ENROLLMENT: LESSONS LEARNED ON SCHOOL-LEVEL IMPLEMENTATION 1, <http://www2.ed.gov/programs/slcp/finaldual.pdf> (discussing the prevalence of the accelerated learning programs and their growing popularity because of the benefits they provide).

4. Caralee J. Adams, *Colleges Vary on Credit for AP, IB, Dual Classes*, EDUC. WEEK (Dec. 9, 2014), <http://www.edweek.org/ew/articles/2014/12/10/colleges-vary-on-credit-for-ap-ib.html> ("Some top selective institutions, where high-achieving students can enter with years of college-level coursework from high school, are becoming stricter in the awarding of credit. Not facing the same volume of incoming credits, public institutions generally are more accepting. The patchwork of increasingly fluid policies, often varying within departments in a college, leaves many students and parents uncertain about how advanced coursework will pay off and pushing for greater transparency.").

5. *Id.* (discussing a student who chose to attend a public university over Ivy League schools because the Ivy League schools would not accept the credits. As a result, she went in to the public university as a junior in lieu of obtaining an Ivy League education.).

tainment.<sup>6</sup> Without a nationally standardized credit-transfer system requiring all institutes of higher education to accept credits earned in high school, the benefits these credits give students will continue to be suppressed by institutions with no incentive to reduce the cost of attendance by enabling students to graduate early.

This country is in an education crisis, and the need to reduce average student debt, increase graduation rates, and improve the return on investment for college graduates is vital to the futures of so many Americans and the continuation of the American education system. Thus, the question this Note seeks to address is: should the federal government implement a standardized universal mandate for all higher education institutions to accept credits earned by students in accelerated learning programs and provide for the expansion of these programs to ensure equal opportunity and access to higher education for all Americans?

This Note will argue that the financial benefits these accelerated learning programs offer are essential to minimizing the national student debt and enabling the American education system to stand as one of the top institutions in the world. Furthermore, the maximization of the potential benefits accelerated learning programs have to offer can be attained through the creation of a universal standard of acceptance adhered to by all higher education institutions in the United States. Establishing a mandatory and equal standard for the acceptance of these credits by all higher education institutions will not only streamline the time to degree attainment, but will ensure students throughout the United States equal access to obtain their desired college education.

Part II of this Note will provide background information pertaining to the types and availability of accelerated learning programs throughout the country. It will also examine the effects these programs have on the secondary (high school) level to postsecondary (collegiate) level transition for currently enrolled students, in addition to the current policies and laws in place governing the implementation and effectiveness of the programs. Finally, Part II will dissect the role higher education institutions play in allowing access to the benefits these programs provide and the potential financial implications.

Part III of this Note will first conduct a thorough analysis of the limitations on the broad accessibility of these programs and how these limitations affect a student's ability to maximize the benefits they expected from their participation. Second, it will dissect the options that are currently available to the federal government to implement a universal credit-acceptance standard for all higher education institutions to extend benefits to all Americans. Finally, Part III will analyze the difference in

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6. *Accelerated Learning Options*, NAT'L CONF. ST. LEGISLATURES (Mar. 3, 2014), <http://www.ncsl.org/research/education/accelerated-learning-options.aspx> ("Offering high-quality, college-level learning experiences in high school can increase the academic quality and rigor of high school classes, lower the need for postsecondary remediation, reduce the high school dropout rate, reduce student costs of attending postsecondary institutions, and prepare young people to succeed in college.")

standing between private and public institutes of higher education with regards to their participation in accelerated learning programs, the resulting effects on their curriculum and revenue, and the reach of the federal and state governments to these institutions.

Part IV will pose a recommendation for an effective standard to be utilized by all colleges and universities to reward college-bound students for successful completion of college-level courses by granting them credits based on their level of achievement and will recommend the most effective ways in which this standard can be reached and effectuated by the government. Such standards will align coursework with general-education courses by equating the level of rigor, access in all high schools across the states, and the awarding of equal credit for successful course completion by all universities, regardless of the home state of the student.

## II. BACKGROUND

Accelerated learning is a broad term that spans the secondary and postsecondary platforms in providing nontraditional options for high school students to earn college credit for courses they take during their high school years.<sup>7</sup> These options were initially intended to “serve as enrichment opportunities for students who were high achievers. . . . [but] [m]ore recently . . . have been used to engage middle and low achievers in their learning and increase academic momentum for underrepresented student populations.”<sup>8</sup> In addition to enriching high-achieving and underrepresented students, these programs offer financial incentives by using the earned college credit to reduce the cost and length of college attendance.<sup>9</sup> Furthermore, a number of studies have shown that, of the

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7. AM. INST. FOR RESEARCH, UNDERSTANDING ACCELERATED LEARNING ACROSS SECONDARY AND POSTSECONDARY EDUCATION 2 (2013), [http://www.ccrscenter.org/sites/default/files/Accelerated%20Learning%20Brief\\_FINAL.pdf](http://www.ccrscenter.org/sites/default/files/Accelerated%20Learning%20Brief_FINAL.pdf) (“[A]ccelerated learning options operate within secondary and postsecondary education but also serve as a bridge between the two systems. Accelerated learning options that exist within either secondary or postsecondary education typically serve as recuperative strategies for students to accelerate the time period in which they learn content knowledge or earn credits. In accelerated learning options that span secondary and postsecondary education, students access content and earn credits in advance of their formal transition into postsecondary education. This strategy is effective at decreasing students’ time to degree because it provides a supported transitional opportunity to ensure that students have the comprehensive set of skills necessary for postsecondary success.”).

8. *Id.*

9. *Research on Dual and Concurrent Enrollment Student Outcomes*, NAT’L ALLIANCE CONCURRENT ENROLLMENT PARTNERSHIPS, <http://www.nacep.org/research-policy/research-studies/> (last visited May 31, 2017) (“[S]tudents who took dual enrollment showed large decreases in the time needed to complete both associates [sic] and bachelor’s degrees: [t]he 2008-09 graduates of two-year colleges who were first-time-in-college at the colleges from which they graduated and had not attempted college credits in high school spent significantly longer earning associate’s degrees than those who did attempt college credits in high school—4.6 years compared with 2.9 years. Graduates who were first-time-in-college students with no record of attempting college credits in high school averaged five years, while those with a record of taking college credits spent an average of 4.6 years earning their [bachelor’s] degrees.” Another study found “that dual credit courses were as effective as tradi-

students who participate in these programs, the percentage of those students attending college is higher, the continuation of college attendance is higher, and those students were more likely to obtain a degree than students who did not participate.<sup>10</sup> The reduction in the amount of time needed to obtain a degree allows for early entrance to the job market, and creates the option to get a dual degree or to begin obtaining a graduate degree.<sup>11</sup> There are a number of accelerated learning options available for students to participate in to earn postsecondary credit. The forms of acceleration between secondary and postsecondary platforms include: (1) advanced coursework such as AP courses<sup>12</sup> and the IB Diploma Programme,<sup>13</sup> (2) school-based models like early and middle college high schools,<sup>14</sup> and (3) dual and concurrent enrollment.<sup>15</sup>

Dual and concurrent enrollment programs are often referred to as “dual credit” programs, or a “program that allows high school students to enroll in college level courses and receive both high school and college credits.”<sup>16</sup> The definitions of dual credit, however, are not consistent across the board. Some scholars have differentiated the term dual credit from articulated credit, defining dual credit as a “process, by which a student enrolls in a course at one institution for credit and, upon enrollment at a second institution of a different level, also receives credit for the same course at the second institution.”<sup>17</sup> These scholars go on to define articulated credit as “transfer credit that results from matching course competencies in the technical field and applying the credit from high school to college level work.”<sup>18</sup> The distinction between the two definitions is premised on the way the college credit is earned, either as credit for the same course that is offered at the postsecondary level or as ap-

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tional courses in preparing students for subsequent coursework for 19 of 21 course pairs across a wide range of disciplines, based on those who earned a B or higher.”) *Id.*

10. *Id.* (discussing a study conducted on students attending an Oregon college or university who had taken at least one dual-credit course during high school). Researchers found that: “[d]ual credit students have a higher college participation rate than high school graduates overall; [d]ual credit students who go on to college continue to the second year at a higher rate than freshmen who enter college without having earned dual credit; [a]mong freshmen who continue to the second year of college, dual credit participants earn a higher first year GPA; [and][s]tudents who continue to the second year of college accumulate more college credit if they take dual credit in high school.” *Id.*

11. *Id.*

12. See *Credit & Placement*, COLLEGEBOARD: AP STUDENTS, <https://apstudent.collegeboard.org/creditandplacement> (last visited May 31, 2017).

13. See *University Admission*, IBO.ORG, <http://www.ibo.org/university-admission/> (last visited May 31, 2017).

14. See AM. INST. FOR RESEASRCH, *supra* note 7, at 3 (“Early college high schools and middle college high schools, located on or near a campus of a postsecondary institution, supplement high school course offerings by enrolling students in college courses for both secondary and postsecondary credit.”).

15. See *Accelerated Learning Options*, *supra* note 6.

16. Johyun Kim, *The Impact of Dual and Articulated Credit on College Readiness and Total Credit Hours in Four Selected Community Colleges: Excerpts From a Doctoral Dissertation Literature Review 1* (July 14, 2008), <http://www.ibhe.org/DualCredit/materials/DualCreditReviewbyJKim.pdf> (excerpt from Ph.D. dissertation, University of Illinois at Urbana–Champaign).

17. *Id.* at 2.

18. *Id.*

plied towards general education requirements in the same subject at the college level.

For purposes of this Note, dual credit will include AP, IB, dual or concurrent enrollment, and school-based models that students participate in under the assumption they will “receive both high school and college credit for a college-level class successfully completed,” either through articulation to a corresponding field or by direct transfer for the course completed.<sup>19</sup>

### A. *Accelerated Learning Options*

Each program is unique in its way of providing college credit to high school students, and different policies govern the implementation and effectiveness of each program throughout the country.<sup>20</sup> Advanced coursework programs are comprised of “[c]ourses taught by high school faculty for high school credit that include national end-of-course exams to determine student attainment of college credit.”<sup>21</sup> The scores earned by the end-of-the-year exams are then articulated into college credit based upon the postsecondary institution’s transfer scale.<sup>22</sup> The amount of credit received varies by school and by the score for each test.<sup>23</sup> AP programs are the most common example of accelerated learning through advanced coursework, with over thirty available courses to take, each of one to five.<sup>24</sup> As popular as AP programs have become, not all courses are available at the schools that participate, and, of course, some high schools do not participate at all.<sup>25</sup> Some colleges require scores of a four or a five to receive credit for the course, and apply the credit towards undergraduate general education requirements, whereas other schools might give credit for a passing score of three, or not give credit at all.<sup>26</sup>

IB is another advanced coursework option consisting of a two-year program available at certain schools around the country which also requires an end-of-the-year exam to earn college credit and that credit is determined based on the postsecondary institution.<sup>27</sup> A majority of high-

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19. *Id.*

20. *See Accelerated Learning Options, supra* note 6.

21. AM. INST. FOR RESEARCH, *supra* note 7, at 3.

22. *Id.*

23. *About AP Scores*, COLLEGEBOARD: AP STUDENTS, <https://apscore.collegeboard.org/scores/about-ap-scores> (last visited May 31, 2017).

24. *Id.*

25. *What it Takes to Take AP*, COLLEGEBOARD: AP STUDENTS, <https://apstudent.collegeboard.org/exploreap/what-it-takes> (last visited May 31, 2017).

26. *See Credit & Placement, supra* note 12 (explaining that each college sets its own policies regarding scores and the amount of credit awarded for each test and corresponding score); *see also* Adams, *supra* note 4 (“In the past 10 years requirements for such credit at the university have inched upward, with many departments now requiring an AP exam score of 4 or 5 to receive credit, instead of a 3, as in the past.”).

27. *See Accelerated Learning Options, supra* note 6 (“The International Baccalaureate Diploma Programme provides a demanding, two-year high school curriculum that leads to final exams and post-secondary credits that are accepted by universities worldwide.”).

er education institutions that grant AP credit also grant IB credit, but IB schools are not as prevalent as the schools that offer AP courses.<sup>28</sup>

Dual and concurrent enrollment programs allow for students to take college classes on a partnering college campus and receive both high school and college credit.<sup>29</sup> These programs require an established relationship between the high school and the corresponding institute, which are usually recognized by articulation agreements that “govern the equivalency and transferability of course and credits.”<sup>30</sup> Perhaps the most important aspect of these agreements is that they lay out the “common core list of courses, a common core numbering system, and rules on how credits are given and the transferability of college credits between institutions.”<sup>31</sup> The inconsistencies among university credit policies dilute the benefits of participating in such programs. College applicants who want to put in extra effort, whether by taking exams or actual college classes, to try and reduce the cost of college attendance and course redundancy are limited to the schools that grant credit (or grant more credit) for a certain score at the expense of potentially not attending a more prestigious college that does not grant the same credit. These inconsistencies are the driving factor behind the need for a national standard for the acceptance and transfer of credit between all postsecondary institutions, public and private.

#### *B. Accessibility to Accelerated Learning Programs at the High School Level*

The expansion and growing popularity of accelerated learning programs has led to an increase in the number of high schools that are participating as well as in the number of students who are enrolled in these programs.<sup>32</sup> Based on a survey conducted by the U.S. Department of Education for the 2010–2011 school year, out of all public high schools, 82% reported that they had students enrolled in dual-credit programs.<sup>33</sup> This proportion of high schools has increased since the 2002–2003 school year

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28. Alexandra Pannoni, *Discover the Difference Between AP and IB Classes*, U.S. NEWS & WORLD REP. (Sept. 2, 2014, 8:30 AM), <http://www.usnews.com/education/blogs/high-school-notes/2014/09/02/discover-the-difference-between-ap-and-ib-classes> (“The IB program is still relatively small compared with the AP program in the U.S.: only about 830 schools offer the IB diploma, according to the program’s organizers. Nearly 14,000 public high schools offered AP courses during the 2012–2013 school year, according to the College Board, which administers the AP program.”).

29. See LAUREN CASSIDY ET AL., *supra* note 3, at 1 (“High school-college partnerships, articulation, funding, and student access and supports are all critical areas to address in order to successfully implement these programs.”).

30. See *id.* at 10.

31. *Id.*

32. Jason L. Taylor & Eric J. Lichtenberger, *Who has Access to Dual Credit in Illinois? Examining High School Characteristics and Dual Credit Participation Rates*, 2013 ILL. EDUC. RES. COUNCIL 5 (2013), <http://www.collegechangeseverything.org/dotAsset/816226ca-51c9-40d8-97ed-81d2d0f1f90e.pdf>.

33. NAT’L CTR. EDUC. STATISTICS, U.S. DEP’T OF EDUC., *DUAL CREDIT AND EXAM-BASED COURSES IN U.S. PUBLIC HIGH SCHOOLS: 2010–2011*, at 3 (2013), <http://nces.ed.gov/pubs2013/2013001.pdf>.

from 71% of schools.<sup>34</sup> Within those schools, during the same time period, the number of participating students increased from 1.2 million to just over 2 million.<sup>35</sup>

These numbers on their face seem to show that these programs are easily accessible to everyone. But there are studies that show that “dual credit is more likely to be accessed by White, middle- and upper-income, and higher-achieving students compared to students who are historically underrepresented in higher education, such as students of color, low-income, and low-to-middle achieving students.”<sup>36</sup> One explanation offered for the differing participation rates is simply based on where students attend high school, in that certain schools may not choose to offer dual-credit opportunities.<sup>37</sup> High school students’ opportunities to access dual-credit programs are not equal throughout the country, based on whether the high school they attend decides to offer dual credit, which can vary based on characteristics such as: school enrollment size, community type, region, and percent of minorities.<sup>38</sup> In 2013, at least forty-seven states had some form of statute or policy dealing with dual-credit policies, but “very few states require[d] high schools or colleges to provide dual credit to high school students, suggesting that the decision to offer dual credit is a voluntary local decision.”<sup>39</sup> According to literature examining a recent survey “that disaggregated the proportion of public high schools offering dual credit by high school characteristics,” schools with less than five hundred students enrolled were less likely to have dual-credit courses than high schools with more than five hundred students enrolled.<sup>40</sup> The same study showed that schools located in small or rural communities were more likely to offer dual-credit courses than those schools in suburban and urban settings.<sup>41</sup> Additionally, the study showed a correlation between whether a school offered dual-credit courses and its nonwhite student population, with a higher number of schools offering dual credit that had less than 50% nonwhite enrollment.<sup>42</sup>

Other studies reveal the importance of supporting AP, IB, and other dual-credit programs in that these “courses offered to high school students may help moderate some of the negative impacts of socioeconomic

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34. Taylor & Lichtenberger, *supra* note 32.

35. *Id.*

36. *Id.*

37. *Id.* at 5–6.

38. *Id.*

39. *Id.* at 5.

40. *Id.* at 6 (“In that study the researchers established that on average, a larger proportion of the high schools with 500 or more students enrolled had dual credit courses (~86%) compared to high schools with less than 500 students enrolled (78%).”).

41. *Id.* (“Based on high school community type, Thomas et al. (2013) also found that a higher proportion of high schools in towns (90%) and rural communities (86%) have dual credit courses compared to high schools in cities (72%) and suburban areas (78%).”).

42. *Id.* (“There also seemed to be a very strong relationship between high schools’ proportion of non-White students and dual credit courses available, where 91% of high schools with less than 50% of non-White students had dual credit courses but only 75% of high schools with 50% or more non-White students had dual credit courses.”) (internal citations omitted).

factors on enrollment in Bachelor's degree programs."<sup>43</sup> In particular, "[a]mong those enrolled in Bachelor's degree programs, 79 percent of high-scoring, low-income students took at least one AP, IB, or other dual-credit course. And across all three socioeconomic groups, most who will continue to study at a college had taken at least one college-level course in high school."<sup>44</sup> Studies such as these reveal the need for policy-makers to increase access to these programs to support closing the enrollment gap between socioeconomic classes.

### C. *Pros and Cons of Accelerated Learning*

As noted above, research shows that there are positive effects produced by accelerated learning programs for the students enrolled in the programs. Empirical studies have revealed that the most common positive outcomes of dual-credit programs include: "improved high school grades and completion rates; increased college-going rates; improved transitions to college (academic, social and psychological preparation); higher college enrollment, grades, and persistence rates; and lower costs."<sup>45</sup> In addition, and probably most notable, is the reduction in time for degree attainment.<sup>46</sup>

Although many studies show that dual-credit programs have financial incentives for students, there is relatively little information regarding the actual cost savings of such programs. Like the dual-credit policies among universities, the cost of tuition varies depending on the school and whether it is a public or private school.<sup>47</sup> According to the most recent survey conducted by the CollegeBoard on college pricing, the average cost of tuition and fees for the 2016–2017 school year was \$33,480 at private institutions, \$9,650 for in-state residents at public institutions, and \$24,930 for out-of-state residents choosing to attend a public university.<sup>48</sup> Of course these numbers do not include the cost of living and succeeding.<sup>49</sup> A more accurate cost of attending one year of college would require adding an additional \$10,440 for housing and meals at public universities or \$11,890 for those attending private colleges.<sup>50</sup> The expenses do not stop there. To complete the picture, "the average cost for books and supplies for the 2016–2017 school year was \$1,250 at public colleges and \$1,230 at private colleges," in addition to other personal and transportation expenses of \$3,270 at public universities and \$2,720 at private

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43. Sakiko Ikoma & Markus Broer, *How Can We Help Students Match College Aspirations to College Enrollment*, AM. INST. FOR RES. (Oct. 19, 2015), <http://educationpolicy.air.org/blog/how-can-we-help-students-match-college-aspirations-college-enrollment>.

44. *Id.*

45. HIGHER LEARNING COMM'N, DUAL CREDIT IN U.S. HIGHER EDUCATION 6 (2013).

46. *Id.*

47. *What's the Price Tag for a College Education?*, COLLEGEDATA, [http://www.collegedata.com/cs/content/content\\_payarticle\\_tmpl.jhtml?articleId=10064](http://www.collegedata.com/cs/content/content_payarticle_tmpl.jhtml?articleId=10064) (last visited May 31, 2017).

48. *Id.*

49. *Id.*

50. *Id.*

ones.<sup>51</sup> Therefore, the average cost of attendance for the 2016–2017 school year came to over \$24,000 for an in-state public college and over \$49,000 for a moderately budgeted private college.<sup>52</sup>

These numbers are not going to stay the same either. Between the 2006–2007 and 2016–2017 school years, the average price of in-state tuition increased 3.5% faster than inflation.<sup>53</sup> Most undergraduate degrees require a 120-credit-hour minimum for degree attainment, and tuition is assessed per credit hour enrolled.<sup>54</sup> Therefore, the less credit hours needed to graduate, the less tuition that needs to be paid. With increasing college costs pressuring the American student, reducing the cost of attendance is imperative to make higher education more attainable.

Some academics have concerns pertaining to the effectiveness of dual-credit programs. These concerns include the failure “to maintain the academic rigor of their equivalent courses taught on college campuses.”<sup>55</sup> Their concern is particularly that the “rigor” is not upheld due to the differences in instructor certification requirements between high-schools and colleges, as well as the authenticity of the classroom environment for courses not taught on a college campus.<sup>56</sup> Skeptics of these programs believe that the course material is not up to par with the collegiate caliber that schools expect their students to thrive in.<sup>57</sup> Another concern that is prevalent in communities that oppose dual credit, but is probably the least convincing, is the idea that dual-credit courses take away from either the college experience, if the courses are taught at the high school, or they take away from the high school experience if students are required to travel to the college campus.<sup>58</sup> In terms of overall factors that lead to a negative outlook on dual-credit programs, the concern about potential loss of either the college experience by finishing early, or the high school experience, by taking classes at a college, seems miniscule in comparison to the positive effects these efforts have on a student’s ability to afford college. The decision to participate in these programs is left at the discretion of the student who is willing to participate. If a student chooses to do so, then they most likely see the potential savings from by-

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51. *Id.*

52. *See id.*

53. *Trends in College Pricing*, COLLEGEBOARD, <https://trends.collegeboard.org/college-pricing/highlights> (last visited Mar. 6, 2017).

54. Nate Johnson et al., *Program Requirements for Associate’s and Bachelor’s Degrees: A National Survey*, COMPLETE C. AM., <http://completeccollege.org/docs/Program%20Requirements%20-%20A%20National%20Survey.pdf> (last visited Mar. 6, 2017).

55. HIGHER LEARNING COMM’N, *supra* note 45, at 7.

56. *Id.*

57. *Id. But cf. Research on Dual and Concurrent Enrollment Outcomes*, *supra* note 9 (discussing a survey on the grades earned by students who took courses while dual enrolled and students who took the same courses upon matriculating into college). The survey “[looked] at course grades in dozens of subject areas, [and] it found few differences between students who took the first course through dual enrollment compared with students who took the first course after matriculating to a community college or university. The authors found no evidence that dual enrollment courses are less rigorous than traditional college courses, and that students appear to be equally prepared for future college coursework.” *Id.*

58. HIGHER LEARNING COMM’N, *supra* note 45.

passing a year of college as outweighing having an extra year of “the college experience.” In addition, if students are prepared for more advanced work in high school, then why should the school system force them to remain average amongst their peers? Maintaining a minimal level of maturity and restraining academic achievement is not the issue at large today, nor should it be concerning enough to inhibit academic acceleration by willing participants.

The cons associated with dual-credit programs and the concerns of higher education systems are not unresolvable, but they highlight the need to standardize general education curriculum and accreditation across the nation so common core standards can be maintained and implemented.

#### *D. Direct and Indirect Costs of Accelerated Learning Credits*

There are still costs associated with these programs. Most of the time the costs are absorbed by the partnering institution or there are incentives that reduce the cost of the AP tests, which vary by school, but there has been a recent trend among universities to relay the costs to the students.<sup>59</sup> The costs associated with these programs are either absorbed by the state and then relayed to the school district, paid for by the parents without financial aid, or paid by the partnering institution through allocation of grants.<sup>60</sup> For example, in 2013, Florida, to the delight of postsecondary institutions, moved the cost burden for dual-enrollment courses to the K-12 school system.<sup>61</sup> This put a greater financial strain on already struggling school districts to fund programs that should not be funded with whatever discretionary funds are available within the school system.<sup>62</sup> Alabama took what seems like a better route by passing a new tax credit.<sup>63</sup> Alabama’s tax credit is available on donations “to a fund that could generate up to \$10 million each year for scholarships so high school students can earn postsecondary credits in career-technical education fields.”<sup>64</sup> With higher education institutions pushing for a new stream of funds for these programs, policy-makers are fighting to make these programs more accessible and to find sources to channel the appropriate

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59. Caralee J. Adams, *Costs, Quality on Radar as Dual Enrollment Rises*, EDUC. WK. (June 3, 2014), <http://www.edweek.org.proxy2.library.illinois.edu/ew/articles/2014/06/04/33dual.h33.html?qs=dual+enrollment+policy>; *AP Central: Exam Fees*, COLLEGEBOARD, <https://professionals.collegeboard.com/testing/ap/about/fees> [hereinafter Adams] (last visited May 31, 2017).

60. W. INTERSTATE COMM’N FOR HIGHER EDUC., *ACCELERATED LEARNING OPTIONS: MOVING THE NEEDLE ON ACCESS AND SUCCESS 14* (2006), [http://www.wiche.edu/info/publications/Accelerated\\_Learning\\_Options.pdf](http://www.wiche.edu/info/publications/Accelerated_Learning_Options.pdf) (“As shown, some states assume the cost, and some school districts or schools carry the burden. In other cases, students and their parents pay for participation. And other arrangements exist as well: in Mississippi, tuition and costs for university-level courses must be paid from grants, foundation funds, or other private sources, directly to the participating university.”).

61. See Adams, *Costs, Quality on Radar as Dual Enrollment Rises*, *supra* note 59.

62. *Id.*

63. *Id.*

64. *Id.*

funds.<sup>65</sup> These policy-makers are aware of the positive effects of dual-credit programs and the need to challenge students. Delaware's Governor, Jack A. Markell, has stated: "We know that students who are challenged in high school with college-level material often rise to the occasion," and this is one of the reasons he is one of many policy-makers trying to create new sources of funding for these programs and to expand access to them.<sup>66</sup> As a result, Governor Markell "proposed a new scholarship program so that 'all low-income Delaware students with college potential can take credit-bearing courses during their senior year of high school.'"<sup>67</sup> Efforts to deal with the costs of these programs reveal the need to fund these programs in a way that promotes growth and stimulates academic achievement by students willing to challenge themselves and get a head start on their desired college education.

Not all higher education institutions support dual credit because the loss of the revenue they would gain from requiring students to take all the required general-education courses at their institution influences their decision to accept pre-college credits.<sup>68</sup> More selective institutions push for students to retake courses they have already earned credit for, reasoning that they will benefit more from the professor's level of instruction, which is a higher standard than the instructors of dual-credit courses in high school, and that students will lose the benefit of "the college experience" when they progress faster through college by obtaining credit before entry.<sup>69</sup> Another factor at play is whether the credits accepted will even contribute to early degree attainment, as they might only count as elective credits, of which the amount needed is limited, instead of applying towards the core degree requirements.<sup>70</sup> This results in students leaving earned credits unused depending on where they choose to attend, which might influence or limit their ability to attend certain schools.

### *E. The Higher Education Act*

The federal government's influence over higher education institutions was formally established in 1965, when Congress passed the Higher Education Act.<sup>71</sup> With goals of expanding access to postsecondary education for disadvantaged students, the Act established a number of federal student-financial-aid programs for students and created an administrative system for oversight of the programs.<sup>72</sup> The Act required all partici-

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65. *Id.*

66. *Id.*

67. *Id.*

68. Adams, *Colleges Vary on Credit for AP, IB, Dual Classes*, *supra* note 4.

69. *See id.*

70. Karel Halloway, *Not All Colleges Accept Dual-Credit Hours Amassed by Texas High School Students*, DALL. NEWS (Nov. 2010), <http://www.dallasnews.com/news/education/headlines/20101103-Not-all-colleges-accept-dual-credit-6829.ece>.

71. 14A CORPUS JURIS SECUNDUM *Colleges and Universities* § 34 (2015).

72. *Id.*

pating colleges and universities to agree “to abide by all statutory, regulatory, and program requirements for obtaining funds, such as submission of periodic reports to the Secretary of Education and maintaining administrative and fiscal procedures and records to insure proper administration of funds.”<sup>73</sup>

Over the years, the Higher Education Act has undergone a number of amendments; however, the most significant amendment was arguably in 1992 with the establishment of “basic educational opportunity grants” commonly known as “Pell Grants.”<sup>74</sup> Even in 1992, Congress saw the need for promoting postsecondary education through grants and other federal funds with a stated purpose:

[T]o encourage partnerships between institutions of higher education and secondary schools serving low-income and disadvantaged students to support programs that would improve retention and graduation rates at secondary schools, improve the academic skills of secondary school students, increase their chances to continue with their education after secondary school, and improve their chances of employment after graduation from college.<sup>75</sup>

The obvious focus of Pell Grants is on low-income and disadvantaged students, yet this leaves out the children of middle-class parents who pay the taxes that fund these programs.<sup>76</sup> Congress has consistently made changes to federal student-loan programs with the intent to “[ensure] access to postsecondary education for all citizens regardless of economic background” thus making it easier to borrow money for higher education.<sup>77</sup> The recognizable difference is that these middle-class students who do not qualify for Pell Grants must repay federal loans, whereas low-income students are able to bypass a portion of repayment because of their access to Pell Grants.

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73. *Id.*

74. Higher Education Amendments of 1992, Pub. L. No. 102–325, 106 Stat. 448.

75. *Id.*

76. Robert C. Cloud & Richard Fossey, *Facing the Student-Debt Crisis: Restoring the Integrity of the Federal Student Loan Program*, 40 J.C. & U.L. 467, 474 (2014) (“United States Representatives and Senators alike concluded that it was unfair and discriminatory, not to mention politically naive, to deny federal loans to students whose parents were paying taxes to fund the loan program. Consequently, Congress responded with the Middle-Income Student Assistance Act of 1978, which relaxed income requirements, enabling a great majority of students to qualify for federal loan assistance.”).

77. *Id.* (“Over the years, Congress has modified the student-loan program when necessary to meet the changing needs of students, parents, and institutions, always with the intent of ensuring access to postsecondary education for all citizens regardless of economic background. Therefore, federal law and policy have made it easy for most students to borrow money for higher education.”).

### F. Pell Grant Reform

Advocates for these accelerated college-bound programs are currently pushing for congressional reforms to provide Federal Pell Grants for early-college high school students.<sup>78</sup> Without reform of the availability of Pell Grants to accelerated learning students, “high school students who would otherwise be eligible for Pell Grants are unfairly penalized for starting their college education early if they have to contribute to tuition, fees, books and/or equipment.”<sup>79</sup>

President Obama approved experimental sites where Federal Pell Grants are available for early-college high school students for the costs associated with these programs, resulting in 79% of the students participating at these sites completing at least one year of college credit before graduating high school, and one in three obtaining sixty hours of credit, or the equivalence of an associate’s degree.<sup>80</sup> “[T]he President’s plan would also encourage states to provide accelerated learning opportunities, smooth the transition from high school to college and between two- and four-year colleges, and strengthen collaboration between high schools and colleges.”<sup>81</sup>

Additionally, the push for the reform of Pell Grant authorization recognizes the importance of these programs on the education front: “[t]his bipartisan effort aims to provide an incentive for high schools to grow or establish early college programs; such programs are often constrained by tuition costs that are prohibitive for students yet also difficult for schools to simply absorb.”<sup>82</sup> Furthermore, the intent behind Pell Grant reform “is to allow Pell Grant funding to be accessed by students that earn transferable college credits, which would include core general education requirements, given that the credits are earned through an early college program offered by an accredited institution.”<sup>83</sup> In summation, the proposed reform bill “will address concerns of any adverse impact on

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78. See Caralee Adams, *Dual-Enrollment Advocates Work for Federal and State Policy Change*, EDUC. WK. (May 8, 2015, 4:48 PM), [http://blogs.edweek.org/edweek/college\\_bound/2015/05/dual\\_enrollment\\_advocates\\_see\\_policy\\_progress\\_at\\_state\\_level.html](http://blogs.edweek.org/edweek/college_bound/2015/05/dual_enrollment_advocates_see_policy_progress_at_state_level.html).

79. Kimberly Mobley, *Raising Awareness of Dual and Concurrent Enrollment Among Federal Policy-Makers*, NAT’L ALLIANCE CONCURRENT ENROLLMENT PARTNERSHIPS (May 6, 2014), <http://www.nacep.org/raising-awareness-of-dual-and-concurrent-enrollment-among-federal-policy-makers/>. Dual and concurrent enrollment programs can save families money since they are usually offered for free or at a reduced price, but when students participate in these programs and have to pay for tuition and expenses, they do not have access to the Federal Pell Grants they would have if they were taking these courses in college. See *id.*

80. *Federal PELL Grant Experiment Extends Financial Aid to High School Students in Dual Enrollment and Early College Programs*, KNOWLEDGE WORKS (Jan. 30, 2015), <http://www.knowledgeworks.org/federal-pell-grant-financial-aid-high-school-students-dual-enrollment-early-college>.

81. Press Release, The White House, Fact Sheet on the President’s Plan to Make College More Affordable: A Better Bargain for the Middle Class (Aug. 22, 2013), <https://obamawhitehouse.archives.gov/the-press-office/2013/08/22/fact-sheet-president-s-plan-make-college-more-affordable-better-bargain->. For full disclosure of President Obama’s plan for higher education reform, see *id.*

82. Jesse O’Connell, *Senators Push Bill Allowing Pell for Early College*, NAT’L ASS’N STUDENT FIN. AID ADMIN. (Apr. 30, 2015), [http://www.nasfaa.org/news-item/373/Senators\\_Push\\_Bill\\_Allowing\\_Pell\\_for\\_Early\\_College](http://www.nasfaa.org/news-item/373/Senators_Push_Bill_Allowing_Pell_for_Early_College).

83. *Id.*

students by reimbursing early college programs for ‘cost of tuition and fees on behalf of eligible students retroactively, based on college credits completed up to an associate degree or four semesters of college coursework.’”<sup>84</sup>

President Obama’s plan to open access to federal Pell Grants for dual-enrollment students is in the experimental stages with only \$20 million allotted for these purposes.<sup>85</sup> In addition, colleges and high schools need to apply to participate, which could lead to oversight issues.<sup>86</sup> Two major issues have been brought to light by this experimental plan that may hinder the effectiveness of expanding the benefits of these programs to all students.<sup>87</sup>

First, the grants come with a statutory twelve-semester cap.<sup>88</sup> This cap is reached after the student has been using the aid for twelve semesters.<sup>89</sup> As soon as a student dips into any federal aid (loans or grants), time starts ticking for their remaining semesters: even if they are in high school.<sup>90</sup> If the clock were to start ticking while the student was still in high school, then it does not necessarily help them move towards earning a degree quicker.<sup>91</sup> Once the student has been collecting federal aid for twelve semesters, they are no longer eligible.<sup>92</sup> The director of external relations for the National College Access Network stated that this particular rule negatively impacts the students who elect to participate in dual enrollment in the earlier years of high school with a certain major in mind but who end up not pursuing that major while in college.<sup>93</sup> In this situation, the credits that student earned might not help the student attain a degree but it will have diminished the aid available to them.<sup>94</sup> Aware of this issue, the U.S. Department of Education restricted the experiment’s requirements, allowing students to receive Pell Grants only for “course work that applies toward completion of a postsecondary credential at the participating institution.”<sup>95</sup> This experiment has been geared toward providing information to assist in reforming federal aid policy.<sup>96</sup> Some setbacks for aid reform might arise out of the need for Congress’ approv-

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84. *Id.*

85. Paul Fain, *Pell Grants in High School*, INSIDE HIGHER ED (Nov. 2, 2015), <https://www.insidehighered.com/news/2015/11/02/feds-encourage-dual-enrollment-through-experimental-access-pell-grants>.

86. *See id.*

87. *See id.*

88. *Id.*

89. *Id.*

90. *Id.*

91. *Id.*

92. *Id.*

93. *Id.* (“As a result, Morgan said, ‘it’s important that dual-enrollment students earn college credits that help move them toward earning a degree or certificate. That’s not always the case. For example, she said a student might pick a dual-enrollment track in hospitality while he or she is only in eighth grade. If the student ends up not pursuing a hospitality credential while in college, those credits might not help the student finish a degree.’”).

94. *Id.*

95. *Id.*

96. *Id.*

al of amendments to the Higher Education Act, which governs the distribution of Pell Grants.<sup>97</sup>

The second issue this experimental program highlights is the fact that, although these accelerated highlights learning programs provide college credit to high school students could be beneficial to all students regardless of socioeconomic status, this offering of aid is only available to low-income students.<sup>98</sup> According to the National Alliance of Concurrent Enrollment, although the tuition prices of these programs are subsidized by most colleges, about two-thirds of these colleges report parent and student contributions towards tuition for these courses.<sup>99</sup> This leads to lower-income students being less likely to take advantage of these courses than wealthier students.<sup>100</sup> Expanding access to these programs to disadvantaged students is vital to fulfilling the purpose of creating equal educational opportunities to use the benefits of these programs for college advancement, but it expanded access to do nothing for the students who do not qualify for Pell Grants initially. This results in limiting access to these programs based on the income of the student's parents, which the student may or may not have access to.

Obama's announcement of these experimental sites has yet to stir up controversy; however, these dual-enrollment programs are facing accreditation issues in states that are overseen by the Higher Learning Commission.<sup>101</sup> Specifically, the Higher Learning Commission recently made clear that in order for a high school teacher to instruct dual-credit courses, they must have a master's degree specializing in the area of instruction or the equivalent of eighteen graduate-level credits in that area.<sup>102</sup> Now, dual-enrollment programs across the country are trying to meet the requirements of instructor qualification.<sup>103</sup> This policy could either help sway the concerns of people not in favor of dual-credit programs for the reason of inadequate "academic rigor," or it could muffle the progress of expanding these programs by limiting the number of people who can instruct the courses.

### G. State Implementation

Some states have already implemented policies and regulations that promote cooperation of higher education institutions with high schools to ensure comparable instruction and material in dual-credit.<sup>104</sup> These states promote equal treatment of these courses by requiring the credits

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97. *Id.*

98. *Id.*

99. *Id.*

100. *Id.*

101. *Id.*

102. *Id.*

103. *Id.*

104. *Id.*; see *infra* text accompanying notes 105–19.

earned by high school students taking these courses to carry the same weight as if the student had taken the class.<sup>105</sup>

Until its recent repeal, Utah's state policy demonstrated a more progressive approach ensuring university recognition of accelerated learning credits.<sup>106</sup> Utah's policy provided that accelerated learning credits "shall be accepted for transfer of credit purposes as if they had been obtained at any public institution of higher education within the state system" and promoted standardizing instruction of these courses to "carry the same credit hour value as when taught on a college or university campus and [to] apply toward graduation on the same basis as courses taught at an institution of higher education to which the credits are submitted."<sup>107</sup>

Utah's policy recognized the ability of students to succeed in accelerated learning programs and specifically instructed the State Board of Regents to adopt rules to ensure that students would be prepared for college-level work by meeting previously established prerequisites for the equivalent campus-based courses (concurrent enrollment).<sup>108</sup> In addition, the rules were intended to counter any "rigor" concerns university affiliates might have about course equivalency in accelerated learning programs.<sup>109</sup> Utah required that "public school educators in concurrent enrollment programs [to] first be approved as adjunct faculty and supervised by a state institution of higher education," and to ensure accountability by both the program and the students, for "teaching [to be] done through live classroom instruction or telecommunications."<sup>110</sup> Furthermore, Utah sought "collaboration among institutions to provide opportunities for general education and high demand career and technical education concurrent enrollment courses to be offered statewide."<sup>111</sup> Utah's policy specifically recognized the need for course equivalency in order for students to make the most of accelerated learning programs and therefore required all "course content, procedures, and teaching materials . . . [to be] approved by the appropriate department or program at an institution of higher education in order to ensure quality and compa-

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105. UTAH CODE ANN. § 53A-15-101 (West 2015) (repealed 2016).

106. Utah didn't start with just ensuring that these credits will transfer between secondary and postsecondary institutions, but Utah focused first on ensuring that the State Board of Regents implemented "curriculum [programs] and [a] delivery system which allow[ed] students the option to complete high school graduation requirements and prepare[ed] them to meet college admission requirements at the conclusion of the eleventh grade, but [did] not preclude a student involved in accelerated learning programs from graduating at an earlier time." *Id.*

107. *Id.*

108. *Id.* ("The State Board of Regents shall adopt rules to ensure the following: . . . college credit courses are taught in high school concurrent enrollment programs by college or university faculty or public school educators . . . to ensure that students are prepared for college level work . . . in meeting prerequisites previously established for the same campus-based course by the sponsoring institution.").

109. *Id.*

110. *Id.*

111. *Id.*

rability with courses offered on college and university campuses.”<sup>112</sup> Utah’s policy served as an effective model for other states looking to expand access to accelerated learning programs by implementing similar standards that put the efforts of willing, hardworking students to the best use.

Florida is another state leading by example to further to transparency and transferability of credits between secondary and postsecondary institutions.<sup>113</sup> Florida uses articulation agreements with the “purpose of building, sustaining, and strengthening these relationships” to provide for the efficient and effective progression and transfer of students within the education system and to allow students to proceed toward their educational objectives as rapidly as their circumstances permit.”<sup>114</sup> Florida specifically states that the purpose behind their accelerated articulation agreements is for “a variety of articulated acceleration mechanisms [to] be available for secondary and postsecondary students attending public educational institutions.”<sup>115</sup> Florida’s statute states that articulated acceleration is intended “to shorten the time necessary for a student to complete the requirements associated with the conference of a high school diploma and a postsecondary degree, broaden the scope of curricular options available to students, or increase the depth of study available for a particular subject.”<sup>116</sup> Florida required the State Board of Educators to collaborate with the Board of Governors to implement statewide policies to “improve and facilitate” articulation. Perhaps most aggressive, the legislation instructs that the policies relate to the “alignment between the exit requirements of one education system and the admissions requirements of another education system into which students typically transfer,”<sup>117</sup> and the “identification of common courses, the level of courses, institutional participation in a statewide course numbering system, and the transferability of credits among such institutions.”<sup>118</sup>

To give further assurance to students regarding the effectiveness of these programs, Florida strengthens its commitment to promoting attainable college education by mandating that “[e]ach Florida College System institution and state university must award credit for specific courses for which competency has been demonstrated” and that these institutions

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112. *Id.*

113. See OFFICE OF ARTICULATION, FLA. DEP’T OF EDUC. 1 (Sept. 2014), <http://www.fldoe.org/core/fileparse.php/5423/urlt/statewide-postsecondary-articulation-manual.pdf>; see also FLA. STAT. § 1007.01 (West 2016).

114. *Id.* § 1007.01(1).

115. *Id.* § 1007.27(1).

116. *Id.*

117. *Id.* § 1007.01(2)(a).

118. *Id.* § 1007.01(2)(b). Florida also instructed the board to recommend policies relating to the “[i]dentification of courses that meet general education or common degree program prerequisite requirements at public postsecondary educational institutions,” and “dual enrollment course equivalencies.” *Id.* §§ 1007.01(2)(c), (d).

“may not exempt students from courses without the award of credit if competencies have been so demonstrated.”<sup>119</sup>

Other programs, such as Minnesota’s Post-Secondary Enrollment Option (“PSEO”), allow tenth-, eleventh- and twelfth-grade high school students to earn credit from the state’s higher education institutions, yet these programs can lack transparency through inefficient regulations.<sup>120</sup> For example, regulations like the “PSEO gag rule,” only allow colleges and universities to inform students and parents about PSEO’s “educational and programmatic” advantages.<sup>121</sup> These institutions are barred from revealing “the fact that the state pays for the college courses, which means students can graduate from high school with two years of college completed—for free.”<sup>122</sup> The state’s ability to control acceptance of credit, however, is limited to public institutions.<sup>123</sup> Problems arise when it comes to out-of-state and private schools, which are not governed by the state policy.

The above issues identify the imperative for a set of national standards and policies to reform of the American education system. The cooperation of federal, state, and local governments is necessary to promote and facilitate the expansion and access to accelerated learning opportunities for all students regardless of their home state or school district. Policy-makers need to unite to address unnecessary costs and inefficient credit transfer policies and to reduce the amount of discretion higher education institutions retain in determining the outcomes of the effort accelerated learning students put forth by rewarding these students for the challenges they rise to meet.

### III. ANALYSIS

There are a number of issues at large in reforming the accelerated learning programs to ensure the acceptance of credits earned by all higher education institutions and to reduce the amount of loans students need to take out to attain their degree. The deference to states to implement their own policies for the creation, protection, and expansion of these programs raises the questions: are students disadvantaged due to their state of residence’s policy reach? Do other state’s policies limit their options for higher education? Another issue is whether federal regulation reform beyond the expansion of Pell Grants for dual-enrollment programs nationwide is going to positively impact students other than low-income students, the students who do not qualify for Pell Grants and can only take out loans. Finally, the authority of both the state and the

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119. *Id.* §1007.27(3).

120. Beth Hawkins, *Education Advocates Embroiled in an 11th-Hour Battle Over Post-Secondary ‘Gag Rule’*, MINNPOST (May 13, 2014), <https://www.minnpost.com/learning-curve/2014/05/education-advocates-embroiled-11th-hour-battle-over-post-secondary-gag-rule>.

121. *Id.*

122. *Id.*

123. *Id.*

federal governments to implement change in the collegiate system for the universal acceptance of dual credits on an equal level nationally, if at all, is limited in reach and scope, especially when it comes to the private institutes of higher education.

#### A. *State Policy Impacts and Limitations*

A majority of states that have initiated policies to promote these programs through funding and mandating transfer of credits have also provided guidelines for improving the qualifications of instructors and the rigor of course work, and for requiring a certain level of instruction to be met by students in order to align with college-level courses.<sup>124</sup> This helps to counterbalance the concerns universities have for accepting credit that the dual-credit courses are not equivalent to the ones offered at the schools.<sup>125</sup> The variation in policies at the state level reveals the negative effect that differing policies and educational options have on students who are under the impression that taking dual-credit courses challenges them earlier to benefit them later.<sup>126</sup>

##### 1. *Disparate Costs of Credit Transfer Policies*

To illustrate the potential academic and financial impact on students subjected to state-by-state disparities in credit-awarding policies, consider the AP scores earned by an aspiring hypothetical film student, Sally from Florida. The impact is evident through an analysis of the credit granted for Sally's AP scores by Florida State University ("FSU") versus credit granted by the private New York University ("NYU") for the same test scores.

First, FSU awards credit for the score of a three out of five for all forty-one of the AP courses; these scores are treated as credit earned towards general education course requirements.<sup>127</sup> For scores of four or five, more credit is granted and the student has the possibility of satisfy-

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124. See generally FLA. STAT. ANN. § 1007.271 (WEST 2017).

125. *Id.*; Catherine Gewertz, *New Teacher Requirements Jeopardize Dual-Credit Classes*, EDUC. WK., (Oct. 14, 2015), <http://www.edweek.org/ew/articles/2015/10/14/new-teacher-requirements-jeopardize-dual-credit-classes.html> ("An expert faculty member is a critical element in ensuring that dual-enrollment students have a college experience that is as rigorous as the college experience they would have had by taking the same class on campus from a college faculty member. A college or university must assure that faculty members teaching dual-credit courses hold the same minimal qualifications as the faculty teaching on its own campus.").

126. Adams, *supra* note 4 ("Some top selective institutions, where high-achieving students can enter with years of college-level coursework from high school, are becoming stricter in the awarding of credit. Not facing the same volume of incoming credits, public institutions generally are more accepting. The patchwork of increasingly fluid policies, often varying within departments in a college, leaves many students and parents uncertain about how advanced coursework will pay off and pushing for greater transparency.").

127. *Credit Policy: Florida State University*, COLLEGEBOARD, <https://apstudent.collegeboard.org/creditandplacement/credit-policy-detail?diCode=5219&orgId=627&name=Florida%20State%20University&address=Tallahassee%2C%20FL> (last visited May 31, 2016).

ing an additional general education course requirement.<sup>128</sup> Sally, who passed eight AP courses, six with a score of three and the remaining two with a score of four, earned thirty-one credits towards FSU's general education requirements.<sup>129</sup> Based on the traditional 120-credit-hour, four-year Bachelor's Degree,<sup>130</sup> Sally's credits amount to a full year of college. FSU assesses tuition based on the number of credit hours enrolled per semester.<sup>131</sup> For in-state students, like Sally, during the 2014–2015 school year, an undergraduate credit hour was \$215.55 for out-of-state students it was \$721.10.<sup>132</sup> Therefore, the total tuition Sally saved through her AP tests is \$6,682.05 as an in-state student and would be \$22,354.10 if she were an out-of-state student. On top of saved tuition cost, Sally would wipe out a full year of fees, room and board, and personal expenses, in reducing her potential four-year degree into a three-year one.

In addition to the cost savings provided by FSU's credit acceptance policy, FSU has established a "Degree in Three" program to assist students who wish to graduate in less than four years.<sup>133</sup> Programs such as this are geared toward students who enter college with articulated credits earned through dual enrollment and other accelerated learning programs.<sup>134</sup> The "Degree in Three" program provides an added benefit to qualifying students by allowing them to register for their core courses at the same time as upperclassmen, which ensures them a seat in the courses required for their major.<sup>135</sup> This benefit expedites the path towards obtaining the core-curriculum credits required for their degree. Another benefit for students in this program is the ability to apply credits earned in an area of focus, as required by the program,<sup>136</sup> to satisfy the requirement of a minor in a particular area to pursue a double major in the same amount of time needed for just one. This program is an excellent example of universities implementing effective opportunities that facilitate accelerated degree attainment. These programs, in addition to standardized credit transfer policies, will fast-track students who desire to reduce the cost of degree attainment by efficiently using the credits they obtain through dual-credit programs lowering the cost of college attendance.

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128. *Id.*

129. *Id.*

130. Johnson et al., *supra* note 54.

131. *Financial Information, Tuition, Fees, Aid, Scholarships, and Employment*, FLA. ST. UNIV., [http://registrar.fsu.edu/bulletin/undergraduate/information/financial\\_info/](http://registrar.fsu.edu/bulletin/undergraduate/information/financial_info/) (last visited May 31, 2017).

132. *Id.*

133. *Programs: Degree in Three*, FLA. ST. UNIV., <http://undergrad.fsu.edu/programs> (last visited Mar. 13, 2017).

134. *Id.* ("Degree in Three is a special program designed to assist students who wish to graduate in less than four years. It is most appropriate for students who enter the university with college credits earned through dual enrollment or through credit by exam, especially if those credits relate to their majors of choice.")

135. *Id.*

136. An area of focus is required to participate in the program and is similar to what many people label as a minor or a certain number of credits obtained through taking courses focusing on a similar academic area of study, such as twelve credits from economics courses that are selected from a list of courses applicable to the major.

In comparison, for Sally's 2014–2015 school year, NYU assesses tuition at a flat rate of \$22,639 for full-time students taking between twelve and eighteen credit hours.<sup>137</sup> The minimum score NYU accepts for AP credit is a four out of five.<sup>138</sup> In addition, NYU only accepts scores for thirty AP courses, thereby removing potential credit for one of Sally's scores of four she earned in a course not accepted by NYU.<sup>139</sup> Therefore, out of all the AP courses Sally took, she would earn a total of four credits at NYU. Considering the flat fee NYU charged for full-time students, these four credits would have no financial impact or time reduction on Sally's desired film degree.

In summation, Sally would have to spend an additional \$45,278 in tuition alone to attend her dream school, NYU, with the second highest-ranked film program in the country, while receiving no recognition for the advanced courses she took in high school. Although FSU's film school is ranked twenty-second in the country,<sup>140</sup> it is the disparity in credit policies that have virtually given Sally no advantage, financial or academic, in choosing to follow her dream of attending NYU without carrying a large financial burden. This uncertainty and unequal opportunity, caused by state of residence, provides further evidence of the need for a national, standardized system for acceptance of credit that does not give discretion to revenue-seeking institutions or limit effectiveness of state policies on institutions under the state's authority.

## 2. *Variations in State Policies*

State policies regarding dual-credit programs can vary by state and program based on entrance criteria, the way the programs are financed, the transferability of credit, the location of courses, rigor, and instructor qualifications.<sup>141</sup> State policies regulating dual-enrollment programs are more widespread than other credit-based transition programs, such as AP or IB programs, because states usually do not regulate those programs.<sup>142</sup> Other credit-based programs, however, need to work within state guidelines; therefore, the policies pertaining to dual-credit programs have a wider impact on a number of students.<sup>143</sup>

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137. *Tuition and Financial Aid*, N.Y.U., <https://www.nyu.edu/admissions/spring-in-ny/tuition-and-financial-aid.html> (last visited Mar. 13, 2017).

138. *Credit Policy: New York University*, COLLEGEBOARD, <https://apstudent.collegeboard.org/creditandplacement/credit-policy-detail?diCode=2562&orgId=3186&name=New%20York%20University&address=New%20York%2C%20NY> (last visited Mar. 13, 2017).

139. *Id.*

140. *The Top 25 Film Schools in the United States 2015*, HOLLYWOOD REP. (Oct. 2, 2015, 9:51 AM), <http://www.hollywoodreporter.com/lists/best-film-schools-2015-top-828483/item/ithaca-college-top-25-film-823664>.

141. U.S. DEP'T EDUC., STATE DUAL ENROLLMENT POLICIES: ADDRESSING ACCESS AND QUALITY 1 (2004).

142. *Id.* at 12.

143. *Id.* ("First, state policy specifically directed at dual enrollment is more common than policy addressing all forms of credit-based transition programs. Although quite a few states have policies related to AP or IB (particularly related to helping students pay for the programs' costly end-of-course

Where states lack policies pertaining to the regulation of dual enrollment, the discretion is then placed in the hands of the participating institutions, which allows for “uneven program structures and equality across the state.”<sup>144</sup> Some states have policies that mandate students have access to dual-enrollment opportunities where others provide voluntary legislation that merely gives schools the option to provide these opportunities to students.<sup>145</sup>

The recent trend for states to pass legislation similar to Florida’s legislature—which ensures the transfer of credit to postsecondary institutions—is evidence of the need to eliminate the disadvantages faced by students in states without similar policies.<sup>146</sup> This variation in state policies impacts students wanting to obtain the benefits from these programs based on where they live; thus, a student who lives in one state might be financially responsible for paying for the program and is not ensured credit acceptance by the postsecondary institution they want to attend, whereas a student in another state would not have to pay to participate and would be ensured the acceptance of credits earned for college credit.

### 3. *Disadvantages of Variation*

The issues arising from the disparities in credit policies between states is evident not only between secondary and postsecondary institutions but is also a well-known problem plaguing interuniversity transfers of credit as well. As part of highlighting the wastefulness of losing credits from transferring between four-year universities, the cost efficiency of obtaining a degree is also relevant.<sup>147</sup> The use of a credit-hour measuring system to determine education has led students to assume that credits “as [a] standardized unit of learning [are] fully transferable across institutions.”<sup>148</sup> This assumption becomes costly for community-college students who believe that a credit hour in one state is equivalent to a credit hour in another.<sup>149</sup> It has been shown that “nearly 60% of students in the United States attend two or more colleges.”<sup>150</sup> With so many students transferring, losing more than twenty credits when transferring to a four-year school after obtaining an Associate’s Degree because of the policies of the incoming institution has huge costs for students.<sup>151</sup> This waste of cred-

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exams), such policies are not widespread and states do not typically regulate the programs themselves.”).

144. *Id.* at 15 (“In other words, a lack of state policy or regulation leaves program decisions up to the participating institutions. This offers institutions flexibility but can create uneven program structures and quality across the state. In the majority of states, however, at least some aspects of dual enrollment are regulated.”).

145. *Id.*

146. *See supra* Section II.G.

147. Amy Laitinen, *College Credit? Kill That*, CNN (Mar. 30, 2015), <http://edition.cnn.com/2015/03/30/opinions/laitinen-credit-hour/>.

148. *Id.*

149. *Id.*

150. *Id.*

151. *Id.*

its because colleges are “routinely [rejecting] credits earned at other colleges . . . [because] they are not a reliable measure of how much students have learned” leads to financial loss not only for the students but “to the federal government and states that are financing this duplicative classroom time.”<sup>152</sup> It is evident that not only is there a need for a standardized policy for credit transfer between secondary and postsecondary institutions but the need is imperative between postsecondary institutions as well. The issue of articulation agreements to resolve these inter-postsecondary credit transfers is a separate issue that is beyond the scope of this Note.

Another issue plaguing students is the variety of state policies regarding eligibility and the intensity of the course work.<sup>153</sup> Some states require a minimum GPA to participate in the programs while others allow the institutions to set their own criteria.<sup>154</sup> Utah sought to diminish this gap in eligibility by requiring both secondary and postsecondary institutions to work together to establish eligibility requirements.<sup>155</sup> These different policy stances create disparity in the opportunities for students across states especially when program admissions are most favorable to “academically advanced students and/or upperclassmen,” and thus, depending on the policies for the programs in a particular state, a student may not be able to benefit from a program as they would if they lived in a state with a subjectively more favorable policy.<sup>156</sup>

The disconnect between states’ funding mechanisms for these programs has the greatest impact on students through its impact on financial resources that could be used elsewhere. By requiring the student to pay for these programs, it defeats certain benefits of participation. Some states provide the funding for these programs, others put the pressure on the participating institutions to decide whether the secondary or postsecondary institution will pay, whereas others split the cost between the two, or relay the costs to students when the financial burden becomes too much for the school district.<sup>157</sup> Students who must pay for the program themselves are obviously disadvantaged compared to those who live in a state that covers the cost, yet state funding is not always the best solution: “States under fiscal pressure may decide to drop their support, shifting

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152. *Id.*

153. U.S. DEP’T EDUC., *supra* note 141, at 17–18.

154. *Id.* (“Many states set their own eligibility requirements. Despite the calls for opening access to dual enrollment to a wide range of students, most of these states require a high level of academic skill for participation in dual enrollment.”).

155. *Id.* (“Thus, although the colleges are ultimately responsible for the quality of students enrolling in their institution, leaving the admissions decision to the high schools means that colleges cannot set their own standards as to what “college ready” means. Utah seeks to balance the needs of secondary and postsecondary institutions by requiring that the institutions work together to set eligibility requirements.”).

156. *Id.* at 21 (“It would seem, then, that of the states concerned with regulating the admission of students into dual enrollment, most limit the program to academically advanced students and/or upperclassmen.”).

157. *Id.* (explaining the number of different funding mechanisms used by states).

the burden back to schools or students, or they may decide to eliminate the programs altogether.”<sup>158</sup>

### B. Federal Resources and Authority

Congress enacted the Higher Education Act of 1965 with the purpose of making postsecondary education available to more people and to provide federal financial assistance to these people in hope of strengthening the education system.<sup>159</sup> This is the authority that governs the availability of funds to higher education institutions and the channel by which policy-makers intend to amend to promote increased access and effectiveness of accelerated learning programs through the recalibration of federal funds for this purpose.<sup>160</sup>

There are a number of initiatives in place that support an acceptance of transfer credit earned by college students between higher education institutions; however, there is no set federal regulation that mandates all institutions (public or private) to accept credits earned prior to college on the same level and for the same credit.<sup>161</sup> Even though the “U.S. Department of Education regularly includes dual and concurrent enrollment in policy guidance and grant guidelines for a number of new and existing programs[,]” the ability to fully control higher education institutions lies mainly with the states, and even then, the reach is limited to those public and nonprofit institutions who receive funding under the Higher Education Act.<sup>162</sup>

The federal government, however, is no stranger to using the power of the purse to exert influence over state-controlled higher education.<sup>163</sup> The allocation of federal funds is a powerful tool in promoting policy change and curbing education policies to align with the federal interests of increasing access to higher education at a reduced cost.<sup>164</sup> The extent of federal involvement in education reform has been expanding since the Higher Education Act of 1965 and has resulted in implementation of pol-

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158. *Id.* at 23.

159. 20 U.S.C. § 1070 (2012) (“It is the purpose of this part, to assist in making available the benefits of postsecondary education to eligible students . . . in institutions of higher education by[:] providing Federal Pell Grants to all eligible students; . . . providing for payments to the States to assist them in making financial aid available to such students; . . . providing for special programs and projects designed (A) to identify and encourage qualified youths with financial or cultural need with a potential for postsecondary education, (B) to prepare students from low-income families for postsecondary education[:] . . . [and] providing assistance to institutions of higher education.”).

160. See the proposals to amend the Higher Education Act at *Higher Education Act Reauthorization*, NAT’L ASS’N STUDENT FIN. AID ADMINS., [http://www.nasfaa.org/Higher\\_Education\\_Act\\_Reauthorization](http://www.nasfaa.org/Higher_Education_Act_Reauthorization) (last visited May 31, 2017).

161. *Summaries for the Correctly Recognizing Educational Achievements To Empower Graduates Act*, GOVTRACK.US, <https://www.govtrack.us/congress/bills/113/s2506/summary> (last visited May 31, 2017).

162. *Legislation and Policy*, NAT’L ALLIANCE CONCURRENT ENROLLMENT PARTNERSHIPS, <http://www.nacep.org/research-policy/legislation-policy/> (last visited May 31, 2017).

163. Jodi Wood Jewell, *Legislating Higher Education: Applying the Lessons of No Child Left Behind to Post-Secondary Education Reformation Proposals*, 50 IDAHO L. REV., 53, 53 (2013).

164. *Id.* at 77.

icies with a broader focus of improving educational equity for all students, rather than just the disadvantaged, in exchange for federal funding.<sup>165</sup>

A prominent example of such influence was exemplified by President Obama's creation of the Race to the Top—a program focused on K-12 education improvement.<sup>166</sup> Race to the Top was a multi-billion-dollar grant that was dispersed to states through a competition to have “more rigorous academic standards, updated data collection strategies, increased teacher effectiveness and improved low-performing schools.”<sup>167</sup> Through the competition, states were pressured to change their education laws to qualify for the dispersal of funds by “eliminat[ing] barriers which prevent tying student achievement data to teacher evaluations” thus “leading to increased federal influence on the education process at the state and local level.”<sup>168</sup>

Through this approach, the “federal government [began] to link continued funding to the adoption of national academic standards, even though the setting of standards has traditionally been within the purview of the states.”<sup>169</sup> This achievement shows that the federal government has the ability to push states to adopt common core state standards through federal funding initiatives and thus can exert the same influence for higher-education reform through common core state standards.

### C. *Private v. Public: Authoritative Reach and Impact*

The downfall of using grants and initiatives to promote these programs manifests when the colleges do not accept the credit: Why would state and federal governments continue to fund these programs with hopes of reducing the cost of college if the credits will not be universally accepted and would limit students to only those schools willing to grant credit? It seems like this conundrum restricts access to more selective schools and private schools, and limits students wishing to reduce college costs through credits obtained to public universities in their area.<sup>170</sup>

Of course, the federal government has the most influence over public universities that rely heavily on federal funds for sustenance. Private schools are less incentivized to follow any type of standard that affects their academic policies if they are less in need of federal funding due to the private donations they rely on for operation.<sup>171</sup> This highlights the

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165. *Id.* at 60 (providing discussion on the No Child Left Behind Act under President Bush's administration).

166. *Id.* at 64.

167. *Id.*

168. *Id.*

169. *Id.* at 65.

170. Jessica Bock, *AP Courses vs. Dual Credit: What's Best for High School Students?*, STLTODAY (May 19, 2013), [http://www.stltoday.com/news/local/metro/ap-courses-vs-dual-credit-what-s-best-for-high/article\\_32de45f2-37e8-572c-a01a-aa7726797e62.html](http://www.stltoday.com/news/local/metro/ap-courses-vs-dual-credit-what-s-best-for-high/article_32de45f2-37e8-572c-a01a-aa7726797e62.html) (“Elite colleges are not likely to accept the credits, but many state colleges and universities do.”).

171. *Id.*

need for incentives other than providing funding in exchange for compliance with a universal credit policy in order to have any grasp over what private universities intend to comply with. Higher education reform is a highly debated topic and to achieve any type of success in reducing the cost of college by improving the effectiveness of accelerated learning courses there are a series of steps that need to be taken. With baseline changes in course content and rigor, higher-education reform can be gradually achieved.

#### IV. RECOMMENDATION

The inconsistency of university credit policies has led to a wasteful academic environment that results in the loss of both hard work pursued with the hopes of getting ahead and the financial benefits of that extra effort. Reforming higher education has historically been a very difficult task considering the increasing costs of attending college and the lack of change on that front.<sup>172</sup>

There have been a number of recommended proposals by scholars that focus on bridging the gap between secondary and postsecondary institutions when it comes to credit transfer policies and the expansion of such programs to ensure equal access throughout the country.<sup>173</sup> Scholars have made a number of reasonable suggestions in hopes of trying to facilitate a more efficient transition from high school to college for students in advanced learning programs.<sup>174</sup> At the state level, scholars suggest “[a]llign[ing] high school curricula, graduation standards, and assessments with the expectations of postsecondary educational institutions and employers; create[ing] governance mechanisms and financial incentives to align K-12 and postsecondary planning and budgets; [and] develop financial aid policies that provide incentives not only to attend but also to complete postsecondary education.”<sup>175</sup> At the district and school levels, recommendations may “emphasiz[ing] rigor and high expectation for all students, along with appropriate counseling and other supports; integrat[ing] strong academic content into career-focused classes; [and] collaborat[ing] with postsecondary institutions, economic development agencies, and employers to help create smoother transitions to college and the workforce.”<sup>176</sup> These are just a few examples of suggestions for improving higher education attainability through advanced learning.

One of the most notable recommendations is the suggestion to align coursework standards, rigor, and expectations between secondary and

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172. Lindsey M. Burke, *Reforming the Higher Education Act to Lower College Costs*, HIGHERED JOBS (Oct. 6, 2014), <https://www.higheredjobs.com/Articles/articleDisplay.cfm?ID=565>.

173. MICHAEL BANGSER, NAT. HIGH SCH. CNTR. PREPARING HIGH SCHOOL STUDENTS FOR SUCCESSFUL TRANSITIONS TO POSTSECONDARY EDUCATION AND EMPLOYMENT (2008), available at [http://www.mdrc.org/sites/default/files/PreparingHSSstudentsforTransition\\_073108.pdf](http://www.mdrc.org/sites/default/files/PreparingHSSstudentsforTransition_073108.pdf).

174. *Id.*

175. *Id.*

176. *Id.*

postsecondary institutions.<sup>177</sup> In order to negate the concerns of scholars regarding the equivalency of these advanced courses to the college classes actually offered at a four-year university, both general education requirements at all universities and the courses offered at secondary institutions need to match up in content and the methods of assessment for credit. Having a standardized system of general education requirements that can be satisfied prior to college through nationally approved courses in high school will not only ensure the applicability of the credits earned through acceleration, but students will be able to rely on these credits to cut the costs of college, which will impose self-accountability to succeed in these classes.

The logic behind such a theory seems apparent, but implementing such a standard for coursework as a national bridge between secondary and postsecondary education proves problematic. It is already well documented that states can be influenced to enact policies that control the public universities' participation in such programs, but the federal power of the purse's reach is strained in controlling private universities' actions and policies since they are not as reliant on federal aid.<sup>178</sup> Therefore, if financial incentives are of limited effect on private universities, perhaps tax benefits conferred upon such universities will promote participation in a national standard program to make compliance worth it and ensure the success of such a recommendation.

The federal government should expand Pell Grants to cover all dual-enrollment and advanced academic program costs, regardless of the economic status of the recipient, to reduce student loan debt for college-bound individuals. All states should require public universities to accept dual credit and implement policies similar to those of Florida and Utah, in that they promote standardized material to be taught in the courses that are equal to the courses offered at universities.<sup>179</sup> The government should provide incentives to private and for-profit universities to accept dual credit after a standard has been set for qualifying course credit by offering tax credits and grants to the institutions that will universally accept dual-credit courses.

Although the federal government has been criticized for overregulating and even hampering economic growth through overly complex and excessive regulations, the need for regulation reform is still necessary for those institutions that rely on federal aid.<sup>180</sup> It has been suggested that the

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177. *Id.*

178. See Jewell, *supra* note 163, at 78 (discussing how “[f]ederal funds play such a huge role in the overall education budget, that states and higher education institutions are in no position to refuse any funding conditions, no matter how unattractive or counterproductive they may be,” therefore these public institutions are more adaptable to the proposals of the federal government through the power of the purse whereas private institutions are not as easily persuaded).

179. UTAH CODE ANN. § 53A-15-101 (West 2015) (repealed 2016); FLA. STAT. ANN. § 1007.271 (WEST 2017).

180. TASK FORCE ON FED. REGULATION OF HIGHER EDUC., RECALIBRATING REGULATION OF COLLEGES AND UNIVERSITIES 7–13 (2015), available at [http://www.help.senate.gov/imo/media/Regulations\\_Task\\_Force\\_Report\\_2015\\_FINAL.pdf](http://www.help.senate.gov/imo/media/Regulations_Task_Force_Report_2015_FINAL.pdf).

federal government's goal in regards to reformation of higher education "should be the creation of a regulatory framework and specific mandates that ensure full institutional accountability in a way that facilitates campus compliance."<sup>181</sup> This goal and recommendation is similar to the one posed by this Note and also suggests that the initial step require the federal government to "accurately analyze compliance costs and seek to minimize them."<sup>182</sup> In addition, a key factor to implementing new regulations and making sure they are effective is through providing accurate information to families and students with a sense of transparency that is understandable.<sup>183</sup>

The federal government should incentivize all universities to universally accept dual credit to allow for equal access to all students wanting to advance their college path and obtain a degree in a minimal amount of time for the least amount of money. Additionally, all states should enact equivalent policies requiring universities to accept credit on a standardized scale that meets an acceptable standard for material coverage of a course. This would ultimately promote equal opportunities to all students wanting to challenge themselves regardless of socioeconomic status, school district, or desire to attend a particular college.

## V. CONCLUSION

American higher education is in dire need of structure and reform without which the attainability and efficiency of postsecondary education is at risk of being deemed impossible. Uniformity throughout the nation on the acceptance of dual credits by all higher education institutions, both public and private, will equalize opportunities for students from all socioeconomic backgrounds and reward high achieving students for making the extra effort to succeed.

By reducing the redundancy of general education courses through a nationally accepted standard for the same credits and applicability to the same courses, the amount of debt college students will have to acquire will be dramatically reduced due to the path of acceleration they chose in high school. The federal government and states' interest in making college more affordable is not a new concept,<sup>184</sup> and the use of financial incentives and burdens through the federal influence of the power of the purse can initiate both state and collegiate cooperation to achieve student-debt-reduction goals.

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181. *Id.* at 9.

182. *Id.*

183. *Id.* ("The system should provide important and accurate information for students and families without imposing enormous data collection burdens on institutions.")

184. See *College Affordability and Completion: Ensuring a Pathway to Opportunity*, U.S. DEP'T OF EDUC., <http://www.ed.gov/college> (last visited May 31, 2017) (discussing a number of efforts under the Obama administration to make college more affordable including "[p]utting in place the largest investment in higher education funding since the GI bill, the Administration has increased total annual aid to students by over \$50 billion from 2008 to 2016, and selected annual tax benefits by over \$12 billion.").

The goal of reducing the cost of college attendance is still unresolved, and the methods the federal government has tried have only lead to increasing student debt. If a standard could be enforced at a national level by all universities in the United States, that could not only improve the attainability of higher education for students but also reduce the time and cost of attending college, then why delay any further? The need for reform is not discretionary. It affects millions of degree-seeking students whose extra efforts are wasted at the discretion of big institutions.

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