

Division of Florida Colleges - Guidance on Developmental Education Placement

The purpose of this document is to provide additional guidance and clarification regarding the Department's guidance to Florida College System institutions related to the impact of COVID-19 on common placement testing requirements.

Background

The Florida Department of Education released [DOE Order No. 2020-EO-02](#) to provide Florida College System (FCS) institutions with additional guidance and information related to institutional responses to COVID-19. Recognizing the impact on students and their ability to sit for placement testing, the emergency order provides flexibility in the method by which students can demonstrate college-level communication and computation skills.

For summer and fall 2020, the emergency order removes the provision in section (s.) 1007.263(1), Florida Statutes (F.S.) that requires that admissions counseling “must use tests to measure achievement of college-level communication and computation competencies by students entering college credit programs” (emphasis added). Please note that colleges must still assess college-level communication and computation skills for non-exempt students and exempt students who opt to be assessed.

To that end, the order expands upon the methods by which students demonstrate achievement of college-level communication and computation skills. The institution may consider, in addition to or in lieu of common placement tests, documented student achievements such as grade point averages, work history, military experience, participation in juried competitions, career interests, degree major declaration, or any combination of such achievements identified in s. 1008.30(5)(a)1, F.S.

Additional Guidance

1. To whom must a Florida College System institution provide admission counseling?

Pursuant to s. 1007.263(1), F.S., admissions counseling shall be provided to all students entering college or career credit programs. Under the emergency order, for students who are not otherwise exempt under s. 1008.30, F.S., counseling must use tests or alternative methods to measure achievement of college-level communication and computation competencies of students entering college credit programs. Counseling includes providing developmental education options for students who the institution determines need to improve communication or computation skills that are essential to perform college-level work.

2. Do the “exempt” and “non-exempt” classifications still apply?

Yes. Section 1008.30(3)(a), F.S., defines exempt students as Florida standard high school diploma recipients who enter ninth grade in a Florida public school in 2003-04 and thereafter and active duty military; these students are not required to demonstrate readiness for college-level work in communication or computation (RCW). Non-exempt students are all students who do not meet exemption criteria; these students are required to demonstrate RCW.

3. When may colleges begin using alternative measures for placement purposes?

Effective immediately, students may demonstrate readiness for college-level work (RCW) in communication or computation via a test or an alternative method, defined in question 4.

4. How can students demonstrate readiness for college-level work (RCW)?

Students can demonstrate RCW via common placement tests in accordance with Rule 6A-10.0315, Florida Administrative Code (F.A.C.), OR via alternative methods including, but not limited to any combination of the following:

- **Grade point averages** earned by the student in high school or previous postsecondary coursework, including dual enrollment coursework.
- A student's **work history** that indicates a demonstration of learning equivalent to RCW.
- **Military experience**, including military coursework and occupations validated by the American Council on Education as having appropriate content, scope and rigor for college credit recommendations.
- **Participation in juried competitions**, such as artistic, literary or media competitions, where the student's work is assessed by one or more experts and demonstrates RCW.
- The student's **career interests** and/or **degree major declaration** and the level of communication and computation skills necessary for success in that career or degree program.

5. Are institutions required to use more than one method for placement?

Each FCS institution has discretion in selecting the method(s) required for students to demonstrate RCW.

6. Can colleges require just a placement test?

Yes. FCS institutions may still require solely a common placement test to determine placement into developmental education in accordance with Rule 6A-10.0315, F.A.C. Institutions are encouraged to consider alternative methods, where feasible, especially while tests may not be available to students.

7. How can institutions begin implementing alternative methods?

Each FCS institution is responsible for designing its own policy governing alternative methods for placement purposes. Institutions are encouraged to build on existing policies for documenting student achievements initially established in their 2014 developmental education implementation plans. Minimally, institutions should consider:

- The measure or measures students may use to demonstrate RCW.
- Minimum standards for students to demonstrate college readiness.
- Acceptable documentation and the method in which the documentation is captured and maintained.
- How fairness will be ensured for all students, including those with disabilities or who are learning English.
- The methods for students to appeal institutional determinations.
- How advisors/assessment coordinators will be trained.
- Cost to students, if any, with consideration given to minimizing costs.
- How students will be informed.

FCS institutions are not required to obtain approval from the Division of Florida Colleges (DFC) on accepting alternative methods prior to implementation. Institutions should begin implementing immediately to avoid disrupting the admissions and enrollment processes.

8. Is the State Board of Education Rule 6A-10.0315, College Preparatory Testing, Placement, and Instruction and s. 1008.30, F.S., Common placement testing for public postsecondary education still effective?

Yes. The DOE Order No. 2020-EO-02 removes the provision in s. 1007.263(1), F.S. that requires that admissions counseling “must use tests to measure achievement of college-level communication and computation competencies by students entering college credit programs.” The emergency order provides an option for colleges to use alternative methods for placement purposes. Colleges that choose to use an approved common placement test should follow the provisions outlined in s. 1008.30, F.S., and Rule 6A-10.0315, F.A.C.

9. Are non-exempt students required to enroll in developmental education if they do not demonstrate RCW?

Yes. Students who are required to demonstrate readiness for college-level reading, writing and mathematics courses, and do not meet the college’s appraisal of readiness, are required to enroll in the associated developmental education course(s) to improve their skills.

10. May exempt students be required to be evaluated to demonstrate readiness for college-level work?

No. Per s. 1008.30 (3)(a), F.S., Florida public high school standard diploma recipients who entered ninth grade in 2003-04 and thereafter and active duty military shall not be required to demonstrate RCW and shall not be required to enroll in developmental education instruction at an FCS institution. An exempted student who opts to have the college assess their RCW or enroll in developmental education courses, or both, should be provided an opportunity to do so. Colleges should follow the same methods of assessing RCW for exempt students as they do for non-exempt students.

11. Do exempt students have to enroll in developmental education?

No. Exempt students are not required to enroll in developmental education regardless of the college’s appraisal of college readiness for college-level reading, writing and mathematics courses.

12. If testing becomes more widely available during the summer or fall 2020 terms, may institutions that adopted alternative methods revert to the common placement tests established in Rule 6A-10.0315, F.A.C.?

Because the availability of testing sites is unpredictable and out of fairness to students, institutions that adopt a policy allowing alternative methods are encouraged to follow that policy for all students for the term(s) in which the policy is in effect.

13. What is the timeline for institutions to implement alternative methods?

Colleges should implement policies as soon as practicable. Because admission and registration for the summer and fall terms are occurring now or in the very near future, colleges should communicate any policy changes to students as early as possible.

14. If a college makes an appraisal of college readiness using an alternative method, is that appraisal final, or can the college require a test later?

A student who demonstrates readiness for college-level reading, writing and mathematics courses by alternative method(s) and enrolls in a Florida College System institution within two years after the college’s appraisal shall not be required to test or complete developmental education when admitted to any Florida College System institution.

15. Will FCS institutions be required to report what mechanism (common placement testing or alternative method) was used for admissions purposes for students affected by COVID-19?

Yes. FCS institutions will be expected to report on how students demonstrated RCW. The division anticipates there will be two reporting mechanisms. While the final details are forthcoming, the division wants to ensure colleges are aware of future reporting requirements for planning and documentation purposes.

First, the division anticipates creating an additional section in the Developmental Education Accountability Report Template that is statutorily due October 31. Historically, the division sends the template and prior reporting year data to colleges by mid-September. Institutions then complete a Word template that includes a reflection on the data provided around success by instructional strategy and success by student groups. Colleges should expect to see the same data and narrative questions from the 2019 report in the 2020 report. In other words, the current requirements for the accountability reports will be the same.

In addition to the regular requirements, the division anticipates adding a section to the 2020 Developmental Education Accountability Report Template to capture institutional responses to COVID-19. We anticipate this reporting will be more *qualitative* in nature as we intend to reserve quantitative components for state reporting. While the final details are to be determined for the October 31 report, institutions that use alternative methods should plan and be prepared to report on the minimum standards identified in Q7:

- The methods students used to demonstrate RCW.
- Minimum standards for students to demonstrate college readiness.
- Acceptable documentation and the method in which the documentation was captured and maintained.
- How fairness was ensured for all students, including those with disabilities or who are learning English.
- Student appeal processes.
- How advisors/assessment coordinators were trained.
- Cost to students.
- How students were informed.

Second, while the final details are to be determined, institutions should plan to capture and submit to CCTCMIS, for all non-exempt students, whether or not each student demonstrated RCW:

- through an approved common placement test only and not through alternative method(s);
- through one or more alternative method(s) only and not through an approved common placement test; or
- through a combination of common placement tests and alternative methods.

Approved common placement tests are those identified in Rule 6A-10.0315, F.A.C. If a college is using another type of test/assessment for placement (such as a home-grown test or a test not in Rule 6A-10.0315, F.A.C.), the college should identify that test as an alternative method.

Additional reporting details will be made available as soon as possible.

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