

**Rule 6A-10.0315, Florida Administrative Code, Demonstration of Readiness for College-Level Communication and Computation**

**Part 1  
Implementation Questions and Answers  
February 22, 2022**

**Impact to Colleges and Students**

1. **Are all Florida College System (FCS) institutions required to use alternative methods instead of common placement tests?**
  - No, FCS institutions may use approved alternative methods in lieu of a common placement test. FCS institutions may also continue to require a common placement test. The amended rule provides additional options for students to demonstrate college readiness.
2. **To whom do the new alternative placement methods apply?**
  - Alternative methods may be used to assess college-level communication and computation skills for college credit dual enrollment eligibility (except local methods), college credit admissions counseling (academic advising), meta-majors advising and developmental education placement for non-exempt students and exempt students who opt in to being assessed.
3. **Did SB 366 change the criteria for determining if a student is exempt or non-exempt from developmental education assessment and placement requirements?**
  - No, SB 366 did not change the status of the exempt and non-exempt student requirements for developmental education placement purposes.
4. **Can students coming to an FCS institution from other states be assessed using alternative methods?**
  - Yes, but there are certain alternative methods that may not apply to out-of-state students, such as grades from Florida high school courses or Florida Standard Assessment scores. Standardized assessments like PSAT, HiSET®, or even a local placement method (for developmental education use, only) from an FCS institution may be available for out-of-state students entering the FCS.

**Approved Alternative Methods**

5. **What were the approved common placement tests in rule before the amendment?**
  - Florida Postsecondary Education Readiness Test (PERT)
  - Next-Generation ACCUPLACER
  - Scholastic Aptitude Test (SAT)
  - American College Testing (ACT)

**6. Did the rule amendment remove any of the previously approved common placement tests?**

- No, the assessments previously approved in rule are still in place. SB 366 allowed the State Board of Education (SBOE) to adopt alternative methods as additional options to assess college readiness.

**7. Can an alternative method be used to determine college readiness in communication and a common placement test for computation, and vice versa?**

- Yes, there is nothing preventing an FCS institution from using any combination of common placement tests and/or alternative methods to assess college readiness in communication and computation.

**8. Can alternative methods be used to determine course-level placement?**

- Yes, but course-level placement is a local decision. Colleges adopting alternative methods can choose to set minimum standards for course-level placement beyond the college ready standards.

**9. Is there a timeline for implementation of alternative methods?**

- No, because the use of alternative methods is not mandated. If FCS institutions do choose to use alternative methods, they can begin to phase in implementation as soon as the rule is effective, which is anticipated to be in early March 2022.

**10. How long will the alternative method standard assessment scores and course grades be valid?**

- A student who demonstrates readiness via an approved alternative method for college-level work in communication and computation by achieving or exceeding the standards established in rule and enrolls in an FCS institution within two (2) years of being assessed shall not be required to be reassessed at an FCS institution. FCS institutions could choose to accept grades and scores if older than two (2) years at their discretion.

**Tests and Assessments**

**11. Is possessing a high school equivalency diploma earned via the GED® Test, HiSET® and TASC™ a demonstration of college readiness?**

- Not necessarily. FCS institutions choosing to use high school equivalency exams as a basis of having demonstrated college readiness should verify that the exam scores have met the college ready standard scores set in rule. Using a high school equivalency diploma as a basis to determine college readiness depends on the score. For example, pursuant to Rule 6A-6.0201, Florida Administrative Code (F.A.C.), a score of 145 on the GED® Test is required for the awarding of a Florida high school diploma. However, as an alternative method, a score of 165 on the GED® Test is required to demonstrate college readiness.

**12. Does the GED® Reasoning Through Language Arts test include both reading and writing?**

- Yes, the GED® Reasoning through Language Arts test is divided into two sections and includes reading and writing. However, the reading and writing scores are combined, so students will receive a single score on the score report.

**13. Does PSAT apply to PSAT/NMSQT and PSAT 10 or only PSAT/NMSQT?**

- PSAT refers to both the PSAT/NMSQT and the PSAT 10.

**Performance in High School Coursework**

**14. In Rule 6A-10.0315(3)(b)(1), F.A.C., are the high school courses listed under “Courses Taught at a Florida Public High School” specific to Florida public high schools only?**

- Yes, any one of the courses listed can be used to demonstrate college readiness for English and math, but they must be from a Florida public high school.

**15. Are there equivalent high school courses for out-of-state students, private school students or homeschool students?**

- No, the rule does not recognize other states’ high school coursework, private school coursework or homeschool coursework, but there are certain alternative methods that would be available to these students, such as a standardized assessment like the PSAT, TASC™, HiSET® or even a local placement method (for developmental education use, only) from an FCS institution.

**16. In Rule 6A-10.0315(3)(b)(2), F.A.C., are the “Accelerated High School Courses,” specific to Florida high schools?**

- No, AICE, IB and AP are nationally recognized courses, so they can be accepted from other states.

**Form No. ALTPLACE-01 Local Placement Methods (Developmental Education)**

**17. Is Form No. ALTPLACE-01 for developmental education placement only?**

- Yes, Form No. ALTPLACE-01 applies to developmental education (mathematics, reading, and writing) placement, including English for Academic Purposes (EAP) placement. Local methods to determine college readiness may not be used for dual enrollment eligibility (please see #24 for reference).

**18. Does Form No. ALTPLACE-01 have to be completed if colleges want to use local methods for course-level placement into college-level courses?**

- No, Form No. ALTPLACE-01 does not have to be completed for course-level placement. This rule only applies to demonstrating readiness for college-level coursework, not placement into specific courses. Course-level placement is a local decision.

**19. How will institutional requests for local alternative methods be evaluated to ensure they are valid and consistent?**

- The proposing FCS institution would need to collect data and complete Form No. ALTPLACE-01 for the Department of Education's (Department) review and consideration. Depending on the type of method proposed, the Division of Florida Colleges (Division) would work with other Department partners as well as with areas external to the Department for alignment, standard setting and validation.

**20. What are some examples of local placement methods not already listed in Form No. ALTPLACE-01?**

- Other communication and computation local placement methods not listed may include, but are not limited to, other standardized assessments, such as ACCUPLACER ESL, the Caribbean Advanced Proficiency Examination (CAPE), DANTES Subject Standardized Tests (DSST), and the Armed Services Vocational Aptitude Battery (ASVAB), or an electronic writing assessment, such as WritePlacer® or a hand-written writing sample.

**21. What is the expectation regarding question number 10 on Form No. ALTPLACE-01 about the availability of the local method in other languages for non-native English speakers?**

- Question number 10 is simply for informational purposes. There is no requirement that a local alternative method be offered in a language other than English.

**22. Does approval of a local placement method expire?**

- It depends on the type of approval:
  - **Full Approval:** If an FCS institution is granted "Full Approval," then the institution has been fully approved to offer a local placement method, which does not expire. If an FCS institution would like to modify a previously fully approved local method, then a new Form No. ALTPLACE-01 would have to be submitted for approval.
  - **Provisional Approval:** If an FCS institution is granted "Provisional Approval," the institution has approval to use the local placement method for a period of three terms, during which time the institution will be required to collect data on the efficacy of the method. At the conclusion of the provisional period, the institution will be required to resubmit its application and supporting documentation to the Division for full approval consideration.

**State Reporting**

**23. If FCS institutions do choose to use alternative methods, when will they have to start reporting?**

- Reporting the use of alternative methods is anticipated to begin starting the 2023-24 academic year and thereafter. Ad hoc reporting may be requested earlier. Additional details are forthcoming.

## **Dual Enrollment**

### **24. What is the impact of alternative methods for college credit dual enrollment eligibility?**

- Pursuant to section 1007.271, Florida Statutes, prospective dual enrollment students may be assessed for college readiness using an alternative method for college credit dual enrollment eligibility. Ultimately, FCS institutions would have to submit a modified Dual Enrollment Articulation Agreement to the Office of Articulation to specify the use of alternative methods.
- Local methods to determine college readiness may not be used for college credit dual enrollment eligibility.

## **English for Academic Purposes (EAP)**

### **25. What is the practical effect of striking paragraph 3 (below) from Rule 6A-10.0315(3) F.A.C.?**

“Students whose first language is not English may be placed in developmental education prior to the required common placement testing, if such instruction is otherwise demonstrated as being necessary. Such students shall require common placement testing.”

- Prior to paragraph three being stricken from rule, non-exempt students whose first language is not English could be placed in EAP coursework before taking a required common placement test.
- In light of paragraph three being stricken from rule, non-exempt students whose first language is not English are still required to be assessed for college readiness in communication and computation; however, the required assessments must now come before enrolling in coursework.
- FCS institutions may use a common placement test, an alternative method approved in rule, and/or submit an application to use a local method to assess students whose first language is not English to meet the assessment requirement.

### **26. Will non-exempt students whose first language is not English who are assessed for readiness for college-level communication and computation via an approved local placement method still have to take a common placement test after taking EAP coursework?**

- No, if an institution is approved to use a local placement method, then that alternative method meets the requirement for assessing college-level communication and/or computation, so students who are placed into EAP courses via a local placement method will continue with EAP coursework until successful completion of the EAP program or by subsequently demonstrating college readiness by way of being reassessed.

## **Other**

### **27. Will the adoption of alternative placement methods trigger changes to other State Board of Education rules?**

- Yes, FDOE is currently reviewing all related rules to determine if current language regarding the usage of common placement tests requires updating to conform with the new statutory provisions.

For example, 6A-10.040, F.A.C., Basic Skills Requirements for Postsecondary Career Certificate Education, will be updated to recognize alternative methods.

**Part 2**  
**Implementation Questions and Answers**  
**April 20, 2022**

**Impact to Colleges and Students**

28. If a college decides to accept any one of the alternative methods listed in 6A-10.0315, then is the college required to accept all of the alternative methods in that category?

- Yes, pursuant to rule 6A-10.0315(3)(a), Florida Administrative Code (F.A.C.), “A score that meets or exceeds the standard score on any one of the assessments shall be accepted as demonstration of readiness for college-level work”.

Additionally, pursuant to rule 6A-10.0315(3)(b), F.A.C., “Any student who has an unweighted high school GPA of 3.0 and achieves a grade of “B” or better in any of the courses listed below shall have demonstrated readiness for college-level work”.

Given the “on any” language in subsection (3)(a) and the “in any” language in subsection (3)(b), an institution would need to recognize all the options listed.

29. Do colleges that adopt an alternative method have the ability to go back and remove the alternative methods option if need be?

- Yes, however, since providing alternative methods is a way to increase options and access for students, it is recommended that institutions adopt the methods in perpetuity unless there are data that suggest the alternative method is not effective at placing students.

30. Would a college have to honor scores for two years if they did decide to not use an alternative method any longer?

- Yes, rule 6A-10.0315, F.A.C. specifies the scores/grades are valid for two years.

**Form No. ALTPPLACE-01 Local Placement Methods (Developmental Education)**

31. If a college is approved to use a local placement method pursuant to rule 6A-10.0315, F.A.C. paragraph (3)(d), does the college have to recognize the entire category of alternative methods (tests and assessments in paragraph (3)(a) or high school coursework in paragraph (3)(b)) to which the local method applies?

- No, a college that is approved to use a local alternative method does not have to recognize all the alternative methods in a given category because local placement methods fall under a different paragraph. For example, if the ACCUPLACER ESL assessment is approved as a local placement method under paragraph (3)(d), that does not bind institutions to use the other assessment methods identified under paragraph (3)(a).

## Dual Enrollment

32. May institutions choose to use alternative methods for only one group, dual enrollment or developmental education, and not the other?
- Yes, there is flexibility in rule to allow for the use of alternative methods for either dual enrollment and/or developmental education. However, the hope is that an institution that would adopt alternative methods for one purpose would eventually adopt it for both purposes.
33. In relation to question #28, is there flexibility via local Dual Enrollment Articulation Agreements to select only one of the options listed in a given category of alternative methods?
- No, Dual Enrollment Articulation Agreements do not allow for flexibility to recognize only one option in a category of alternative methods.

Pursuant to rule 6A-10.0315(3)(a), Florida Administrative Code (F.A.C.), “A score that meets or exceeds the standard score on any one of the assessments shall be accepted as demonstration of readiness for college-level work”.

Additionally, pursuant to rule 6A-10.0315(3)(b), F.A.C., “Any student who has an unweighted high school GPA of 3.0 and achieves a grade of “B” or better in any of the courses listed below shall have demonstrated readiness for college-level work”.

Given the “on any” language in subsection (3)(a) and the “in any” language in subsection (3)(b), an institution would need to recognize all the options listed.