MEMORANDUM

DATE: November 2014

TO: Interested Parties

FROM: Office of the Attorney General (AGO)
Office of Superintendent of Public Instruction (OSPI)
State Board for Community and Technical Colleges (SBCTC)
State Board of Education (SBE)
Washington Student Achievement Council (WSAC)

SUBJECT: Running Start Program – Questions and Answers

The Running Start Program was initiated by the Legislature as a component of the 1990 parent and student “Choice Act” (Chapter 9, Laws of 1990, 1st Ex. Sess.). As amended, the provisions of the “Choice Act” that pertain to Running Start are codified at RCW 28A.600.300 to RCW 28A.600.400. It is intended to provide students a program option consisting of attendance at certain institutions of higher education and the simultaneous earning of high school and college/university credit.

Eleventh and 12th Grade students have a right granted by the Legislature to participate in Running Start at public expense. The exercise of that right is subject only to minimal eligibility and procedural requirements, which are spelled out, in state administrative rules.

This document is the 2014 updated version of the “brochure” first printed in April 1997. The answers have been developed in collaboration with a variety of K-12 and higher education representatives and the Office of the Attorney General. The answers reflect how schools, school districts, and higher education institutions need to implement or administer various elements of Running Start in order to be in compliance with state statutes. There are a total of 99 questions distributed among the following categories:

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- Classes Offered in the High School Setting 5 questions (p. 1-2)
- Credit and Financial Aid Eligibility 10 questions (p. 2-4)
- Disability Services 5 questions (p. 4-5)
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- Fees and Tuition 7 questions (p. 10-11)
- Foreign Exchange / International Students / Study Abroad 2 questions (p. 11)
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The applicable statutes are RCW 28A.600.300 through 28A.600.400, RCW 28A.150.260, RCW 28A.150.290, and RCW 28B.50.535.

The applicable implementing rules are found in Chapter 392-169 WAC (OSPI rules).
RUNNING START PROGRAM

Questions and Answers

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## QUESTIONS & ANSWERS
### Attendance

**Q-1.** May a district require that one of its public high school students attend the high school for the purpose of completing non-credit requirements such as a senior project or other local district non-credit graduation requirement?

**A.** Yes. See answers to Q-71, Q-72 and Q-79.

**Q-2.** If a student has completed state graduation requirements, but has not yet graduated, and drops out of any courses being taken through Running Start, is the student considered truant?

**A.** No. Technically, meeting state graduation requirements with or without a diploma satisfies the compulsory attendance requirement. **RCW 28A.225.010** See also Q-44.

**Q-3.** Can a student withdraw from a class taken through Running Start without the permission of the high school or school district?

**A.** Yes. School districts should closely coordinate with colleges to ensure that the student does not become truant due to the withdrawal from a Running Start Class. The student may have to be enrolled in additional high school coursework to avoid truancy. Students withdrawing from a Running Start class are responsible for following Add/Drop policies of the college consistent with their terms of enrollment. Colleges may only claim students who participated in instructional activity sometime during the prior month. District’s notification of a student’s withdrawal from the Running Start class ensures that the colleges does not incorrectly over-claim these students.

## QUESTIONS & ANSWERS
### Classes Offered in the High School Setting

**Q-4.** Can colleges offer Running Start classes at a high school setting?

**A.** Yes. Colleges can offer Running Start classes in the high school setting. These classes must align with the high school calendar; either offered over the high school semester, trimester, or over the entire high school year. Running Start FTE is based on the number of months of the class, typically five months for semester classes, three or four months for trimester classes and ten months for the school year.

**Q-5.** Can a student enrolled in one Running Start class at the high school setting be claimed by the high school for a 1.0 FTE for the remaining high school classes?

**A.** It depends. FTE for high school classes is based on the student’s enrolled minutes. 1,500 weekly average minutes equals 1.0 FTE. If the student’s remaining high school classes average 1,500 weekly minutes, then the high school can claim the student as a 1.0 FTE. If the high school classes average less than 1,500 weekly minutes, the high school is limited to less than a 1.0 FTE.

**Q-6.** Can colleges reimburse the high school for the cost of hosting the Running Start classes?

**A.** Yes. Districts are allowed to negotiate recovery of cost of the district instructor’s salary and facility use through the written contractual agreements between the college and the school district.

**Q-7.** Can a class offered in a high school setting have mixed enrollment – some students working for the Running Start dual credit and other students working for the high school credit?

**A.** Yes. High schools may offer a class that is comprised of both students enrolled in a Running Start class working to earn dual credit, as well as students who are only working for high school credits. Documentation that differentiates instruction and class requirements between the Running Start class and the high school credits.
class must be maintained. Additionally, for CEDARS reporting, there must be two classes established - one for the high school class and one for the Running Start class. The CEDARS course designation code "R" can only be used for those students eligible to receive the Running Start college credit.

Q-8. What elements should be addressed in the agreement between the college and the school district?
A. Colleges and school districts must have an agreement in place for the Running Start in the high school setting class. Typically, this is in the form of a MOU or contract. These agreements should outline the high school, school district, students, and college responsibilities with regards to offering these classes. Additionally, the agreements should address payment of teacher stipends, college reimbursement to the school district for hosting these classes, and student’s rights and responsibilities, including the applicability of discipline policies. For mixed enrollment class, the syllabus for the Running Start class should be attached. The agreement should be established in accordance with school board policies.

Q-9. Are Running Start Enrollment Verification Form (RSEVF) required to be completed for students enrolling in Running Start classes offered in a high school setting?
A. Yes. For all Running Start enrollment regardless of the location of the class, a RSEVF is required for each student, each term, and for each college.

QUESTIONS & ANSWERS
Credit and Financial Aid Eligibility

Q-10. May a high school district elect to reduce the rate of credit granted a Running Start student for five-quarter (credit) hours of college work to less than one credit?
A. No. RCW 28A.230.090 and 1997 c 222 has established that five-quarter (credit) hours shall equal one high school credit. School districts therefore, are required to grant one full high school credit for every five-quarter credit hours of work successfully completed by a Running Start student.

Q-11. Can a high school or school district impose a sequence requirement on Running Start students?
A. Yes. A rational course sequence requirement could be imposed as long as it applied to all high school students.

Q-12. May high school districts split the credits between required and elective courses?
A. Yes, but not on a uniform rate basis, but rather on a case-by-case evaluation of the extent to which a college course is the equivalent of required high school course work. An arbitrary uniform rate is squarely at odds with the course-by-course comparison and judgment required by WAC 392-169-050. It is permissible for the common school district superintendent, on an individual course basis, to split the credit for a course that is not comparable, following consultation with a college representative. The total credit awarded must still equate to the five-quarter credits equals one high school credit basis.

Q-13. Can a district refuse to establish Occupational Education or Arts dual credit equivalencies?
A. Yes. Each high school or school district board of directors has the authority to adopt course equivalencies for Running Start Occupational Education or Arts courses offered to students. However, the Legislature has also made it clear that its intent "is to encourage maximum student access." School districts are encouraged to establish any and all appropriate equivalencies, reflecting legislative intent for this program.

Q-14. May a high school restrict Running Start students from taking two like subjects in the same academic year? (Example: English 101 and 102).
A. No.

Q-15. Are Running Start students allowed to take online classes for dual credit?
A. Yes.

Q-16. May a Running Start student “challenge” a course and be claimed for state funding?

A. Generally, no. State funding for Running Start is based on monthly enrollment counts. Students can only be claimed on enrollment counts if they participate in instructional activities during the month prior to the count, and are subject to the 1.2 FTE monthly enrollment limit. Accelerated completion of a course is likely to exceed a student’s monthly enrollment limits, and could result in a charge back to the student. Students are also responsible for paying fees associated with the challenge.

Q-17. Which college courses may a Running Start student take?

A. The entire college catalog is available to Running Start students, assuming that they have met any pre-requisites that the college requires of all students.

Q-18. Do Washington community and technical college credits transfer to out-of-state colleges or universities?

A. Transferability issues for courses taken while in Running Start are the same as for all other community and technical college course work. Parents and students are encouraged to educate themselves about the transferability of credits to another college, especially for all private and out-of-state universities and 4-year colleges. The receiving school has the right to determine which credits it will accept.

Q-19. Do credits earned through dual enrollment programs like Running Start affect a student’s NCAA eligibility?

A. No. NCAA Bylaw 14.2.2.3 Joint College/High School Program states: “A student-athlete’s eligibility under the five-year rule does not begin while a student is enrolled in a collegiate institution in a joint high school/college academic program for high school students in which the courses count as both high school graduation credit and college credit, provided the student has not officially graduated from high school and does not participate in intercollegiate athletics while enrolled in the joint program.” (Revised: 11/01/2001 effective 8/01/2002)

College courses may be used to satisfy NCAA core-curriculum requirements if the courses are accepted and awarded credit by the high school for any student and meet all other requirements for core courses. College courses must be placed on the student’s high school transcript.

Q-20. How do credits earned through dual enrollment programs impact a student’s financial aid eligibility?

A. Financial aid eligibility of students while in Running Start. Running Start students are not eligible for federal or state financial aid. Institutions may use their institutional financial aid fund for these students if they choose. Students are encouraged to inquire with the college to determine if there is assistance available for books, transportation, or any remaining tuition charges if enrolled in credits above and beyond those authorized for Running Start (unsubsidized college tuition expenses). See answers to Q53 and 58 for tuition and fee waiver eligibility.

Financial aid eligibility of former Running Start students. Basic eligibility for federal and state need-based aid is dependent on the student and family’s financial strength, not participation in Running Start. Having earned credits as a Running Start student will, however, affect the length of time a student can continue to receive aid, the satisfactory academic progress evaluation, as well as the annual maximum award amounts for federal student loan programs.

Tip: Students with questions about the effect of Running Start on their student aid or scholarship packages should always check directly with the school’s admissions, financial aid, and scholarship offices.

Maximum Timeframe

Many types of financial aid have a maximum timeframe for eligibility that limits the length of time to receive aid. The limitation depends on the state, federal, and institutional policy, but is generally either 125 or 150 percent of the program length.

For Example:
If the Student Has 90 Credits From Running Start Accepted By the School

<table>
<thead>
<tr>
<th>And the four-year College's Maximum Timeframe policy is:</th>
<th>And the Minimum Needed For a BA Degree is:</th>
<th>The maximum credits that can be earned before losing student aid eligibility is:</th>
<th>And the remaining credits that can be earned without jeopardizing student aid is:</th>
</tr>
</thead>
<tbody>
<tr>
<td>150%</td>
<td>180</td>
<td>270</td>
<td>180</td>
</tr>
<tr>
<td>125%</td>
<td>180</td>
<td>225</td>
<td>135</td>
</tr>
</tbody>
</table>

Appeals of the Timeframe
Depending on the school, individual students may be allowed to appeal the limit. Appeals, if accepted, are based on each student’s individual circumstances. Appeals often revolve around changes to the student’s major, reconsideration of earlier remedial coursework, or unavoidable circumstances that extend the student’s course of study.

Effect of Year-in-School on Maximum Annual Federal Student Loan Amounts
The federal student loan programs permit higher awards for second- and third-year students than for first-year students. Running Start students who achieve third-year status at the end of their Running Start program will qualify for the higher loan amounts right out of high school.

Satisfactory Academic Progress
One of the requirements for financial aid eligibility is that students maintain satisfactory academic progress (SAP). Poor academic performance in Running Start, including withdrawing from courses, can negatively impact student aid eligibility.

SAP is a measurement of academic performance in terms of GPA and completed credits. Specific standards may vary by institution. **All prior college coursework, including that taken through Running Start, will be evaluated for SAP.**

Scholarships
**Private Donor and Institutional Scholarships**
Policies surrounding private scholarships rest with the donor. The awarding of institutional scholarships is controlled by each college.

It is up to each private donor or each institution to determine how Running Start credits impact consideration for scholarships that are reserved for freshmen.

Many four-year universities and colleges allow Running Start students to apply for scholarships. Students should check with the scholarship office of the school in which they are enrolling to understand the college or university policy.

**QUESTIONS & ANSWERS**

**Disability Services**

Q-21. What should a high school student with an IEP or 504 plan do to seek accommodations from the college as part of their participation in Running Start?

A. Unlike students in K-12 schools, Running Start students have a responsibility to request any necessary accommodations from their college directly. The student should contact the college’s disability services office well in advance of any published deadlines to make the request. The college may require documentation in support of a request for accommodations.

Q-22. Who is responsible for covering the costs associated with ADA or section 504 accommodations for Running Start students?

A. Institutions of higher education are responsible for providing reasonable accommodations to qualified students under the ADA and section 504. As with any other enrolled qualified student, colleges and universities must cover the costs of complying with ADA or section 504 for Running Start students who are enrolled in classes located at the college or university.
Q-23. Who is responsible for covering the costs associated with special education services that are outlined in a student’s Individualized Education Program (IEP)?

A. School districts are responsible for providing the services outlined in an Individualized Education Program (IEP) for an eligible student. See WAC 392-169-080. Colleges and high schools should work together to ensure that a student’s needs are being met, including, where appropriate, entering into an interagency agreement to assure that each agency is complying with its respective duties to provide appropriate accommodations to the disabled student under state and federal law. School districts providing special education services to a student can claim eligible students on the P223H for special education funding. The enrolled hours of special education services provided as part of a high school program may be claimed as a partial FTE on the P223 for basic education funding.

Q-24. How long is a student with an IEP or section 504 plan eligible for Running Start?

A. Running Start is intended to provide the equivalent of two academic years of eligibility for dual credit. An IEP or section 504 plan, however, may indicate a student’s need to extend the length of time required to complete his or her secondary education program. It is also possible that the academic and calendar year may not coincide under the IEP or section 504 plan. Eligibility for Running Start may continue, if appropriate to the IEP or section 504 plan, while the student continues work toward the diploma so long as the courses being taken continue to address specific credit requirements necessary for high school graduation and the student is otherwise eligible.

Q-25. Does an IEP automatically qualify a student for Running Start if identified in the student’s transition plan?

A. No. The student must be eligible for Running Start in order to be claimed as a Running Start student. The IEP doesn’t override or trump that requirement. Under the law, a transition plan is simply a course of instruction that is part of a student’s IEP.

### QUESTIONS & ANSWERS

**Eligibility**

Q-26. What are the definitions of an FTE and AAFTE?

FTE (Full Time Equivalent) is the measurement of a student’s instructional enrollment. For high school and skills center classes, 1.0 FTE is equal to 25 instructional weekly hours or 1,500 weekly minutes. For part-time high school enrollment, FTE is calculated by dividing the student’s enrolled weekly minutes by 1,500.

For Running Start college course, FTE is based on the number of enrolled credits and number of months the class is offered. Determining the number of months is based on the number of months a student takes to earn the college credit. The formula to calculate a student’s FTE is (# of enrolled credits ÷ 15) x (3 ÷ number of months of class)

AAFTE (Annual Average Full Time Equivalent) is defined as the annual average FTE. For high school classes and for Running Start classes offered in the high school setting, AAFTE is the 10-month average of reported enrollment from September through June. For Running Start courses offered at the college campus, AAFTE is the 9-month average of reported enrollment from October through June.

Q-27. Must the high schools/districts and community and technical colleges use the state-wide Running Start Enrollment Verification Form (RSEVF)?

A. Yes. A RSEVF is required to be completed prior to the beginning of the Running Start class for each Running Start student including those attending private schools and are home-based, for each term, and for each college. Completion would include the student, parent, high school, and college signatures. Copies of each student's completed form should be retained at the high school and college, as well as, a copy given to the student. The original completed RSEVF should be given to the Running Start student.
Q-28. How frequently will the RSEVF be updated by OSPI and the SBCTC?
   A. The RSEVF will be updated by OSPI and the SBCTC at least annually and be available on the OSPI website at: http://www.k12.wa.us/SecondaryEducation/CareerCollegeReadiness/RunningStart.aspx

Q-29. May a student change their high school or college course schedule after the RSEVF has been signed?
   A. Yes. If a student changes his high school or college schedule after the RSEVF has been signed, a new RSEVF must be completed and submitted immediately, reflecting the revised Running Start FTE eligibility. This informs all parties of the effect the schedule change on the claimable FTE and gives the college the opportunity to contact the parents/student for tuition.

Q-30. May a student elect to take more than a combined 1.20 FTE of high school and college classes in a college quarter?
   A. Yes. A student may elect to take additional college classes above the 1.20 FTE, but must pay for the additional college credits. See also Q-64 and Q-67.

Q-31. May a Running Start student be enrolled full-time at a participating college or university and also enroll in a class at the high school?
   A. Yes. A Running Start student may be claimed up to a combined 1.20 FTE between the high school and the participating college or university with a maximum of 1.00 FTE at each entity. A student attending Running Start full-time and taking up to 15 credits can also attend the high school and be claimed for a 0.20 FTE. A student enrolling for more than the combined 1.20 FTE may be required to pay tuition to the college for the additional college credits or may qualify to receive a low-income tuition waiver from the college.

Q-32. If a student takes a “college orientation” class or any course in August, will it be funded through Running Start?
   A. No. Running Start enrollment is limited to the standard K-12 school year funding months (September through June). Enrollment in August is outside this funding period and cannot be claimed for state apportionment.

Q-33. Can the college claim and bill for a compressed class completed prior to the October “count” date?
   A. Running Start enrollment is based on enrollment on or prior to the “count” day and the Running Start FTE is based on the student enrolled credits and the number of months of the class. Often times, students may take a compressed class offered at the college campus in September. Colleges can choose to base the October count on the compressed September class or choose to count the student’s fall term classes offered at the college campus. Colleges are limited to one of these choices and the student’s September compressed class and the fall term enrollment cannot be combined. Colleges are limited in claiming the September compressed class for the October count day only.

Q-34. Can school districts limit a student’s enrollment in Running Start?
   A. A school district cannot limit a student’s enrollment in Running Start by requiring the student to be enrolled full-time in high school classes and restricting the student’s enrollment at the college to 0.20 FTE. This prohibition would extend to requiring students to take a class, otherwise available as Running Start eligible, as College in the High School and requiring the student to pay tuition for the dual credit earned in this program. Students who qualify for Running Start can enroll up to 15 college credits, provided that they satisfy the college’s prerequisite requirements and do not surpass the combined 1.20 FTE and AAFTE maximums.

Q-35. May a school district condition a student’s eligibility for enrollment as a student in the Running Start Program upon a determination by school district personnel that the student is academically qualified to take college or university course work?
   A. No. The determination of whether or not a student is competent to profit from college or university course work is within the jurisdiction and authority of the college or university. WAC 392-169-045
Q-36. May a school district condition a student's eligibility for enrollment in the Running Start Program upon the maintenance of a particular grade point average?
A. No. The eligibility requirements for participation in the Running Start Program are set forth in statute and rule to the exclusion of any GPA requirement. Nothing in statute or rule implies any authority for school districts to impose additional requirements or conditions upon a student who meets the minimum requirements imposed by law.

Q-37. How is junior/senior standing determined?
A. It is the responsibility of the school district to establish junior/senior standing. Any criteria used to establish grade placement must be applied uniformly in accordance with district policy to students irrespective of their status as Running Start students. See also Q-82.

Q-38. May a student start the Running Start Program mid-year?
A. Yes. Students may begin to take Running Start classes at the start of any term during their junior or senior academic year (excluding summer college quarter).
Note: In order to receive the full benefit of the Running Start program allowable under the law, students should start at the beginning of the first term of their junior year in high school. WAC 392-169-055

Q-39. May a second-year senior enroll in the Running Start Program?
A. A second-year senior may enroll in the Running Start Program if they have been enrolled previously as a junior or a senior, but may only take those specific courses needed to graduate from high school. A second-year senior is generally understood as being a student who has failed to meet high school graduation requirements by the end of the student’s 12th grade academic year. WAC 392-169-055

Q-40. Can a student have all the credits for a diploma and still attend Running Start if they do not take the step of graduating? (This is the same question as Q-82. It is included under two different topics because it pertains to both.)
A. Yes. A student who has not as of the beginning of a school year earned the credits needed for a high school diploma is eligible to attend Running Start until the end of the school year. Students who have completed all the credits needed for high school graduation before the beginning of a school year are not eligible to participate in Running Start. WAC 392-169-020

Q-41. Can a student in second-year senior status stay in Running Start just to complete an associate degree?
A. No. Running Start is a dual credit program and is intended to advance students toward the earning of credit to complete high school graduation requirements. RCW 28A.600.360, WAC 392.160.015. The pursuit of an associate degree is not the intent of the Running Start program.

Q-42. May a high school deny Running Start participation to students under the age of 21?
A. No. A student who is under the age 21 as of September 1st of the new school year is eligible to participate in Running Start for that school year. A student who turns 21 during the school year, has not met the school districts graduation requirements, and is determined to be a junior or senior by the school district may continue to participate for that school year but could not continue for the next school year, unless eligible under age requirements and second-year senior provisions WAC 392.169.055

Q-43. Can a Running Start student retake a course to improve their grade?
A. Yes, if repeating the course is allowed by both high school and college local policies.

Q-44. Are Running Start students subject to the compulsory attendance laws?
A. Yes, Running Start students are subject to the compulsory attendance laws, as set out in RCW 28A.225.010.
Q-45. May a student expelled from high school for a serious offense continue to be enrolled in Running Start?

A. Yes. Students who have been suspended or expelled from their high school for a violation of school district policies may continue to participate in college classes through the end of the academic term. Colleges may not discipline Running Start students who have been suspended or expelled from high school unless the college determines that the student has violated the college’s own student conduct code. However, students attending Running Start courses in the high school setting may be unable to meet the requirements of their courses if suspended or expelled under district policies. Districts and colleges should address the applicability of their respective discipline policies in contractual agreements that govern such courses.

Q-46. May a student who has been previously expelled from high school enroll in a college course through Running Start?

A. Yes, contingent upon being reenrolled in a high school.

Q-47. If a currently-enrolled Running Start student moves out of the high school district, can the student continue Running Start through the original district?

A. Yes. A student who moves to a new school district in Washington State after enrolling in Running Start, attends an institution of higher education located in the new school district, and takes no classes at any high school in the new district, shall be deemed to have retained his or her residence in the school district of initial Running Start enrollment for high school graduation, funding, and other purposes under the Running Start Program. WAC 392-169-020(2)

Q-48. Is a student who completes Grade 12 in one district, then transfers the following year to another district where the student is placed as a 12th grader (not as a second-year senior) eligible to be coded as a first-year senior in Running Start?

A. No. The student is limited to second-year senior standards. RCW 28A.600.330

Q-49. Do Running Start students need to meet all district and state graduation requirements in order to earn a district high school diploma?

A. Yes.

Q-50. May Running Start students earning a district high school diploma be excused from the required statewide proficiency tests because the testing conflicts with college classes?

A. No. Arrangements should be made at the college or high school to accommodate the student who is taking the high school test required by the state.

Q-51. If a Running Start student withdraws from the college, can the high school prohibit the student from returning to the high school?

A. No. It is the duty of the high school to provide an education for students residing in the district or who have been released from their resident district to attend the district through a choice transfer as otherwise provided by law.

Q-52. What is the responsibility of the school district to inform potential Running Start students about the Running Start program?

A. A school district shall provide general information about the program to all pupils in grades ten, eleven, and twelve and the parents and guardians of those pupils, including information about the opportunity to enroll in the program through online courses available at state institutions of higher education and including the college high school diploma options under RCW 28B.50.535. To assist the district in planning, a pupil shall inform the district of the pupil's intent to enroll in courses at an institution of higher education for credit. Students are responsible for applying for admission to the institution of higher education. RCW 28A.600.320

Q-53. Who determines which university or college the students will attend?
A. The students and their parents. Although students will generally attend the college closest to their high school district or Running Start classes at the high school, they may attend any eligible state institution of higher education.

Q-54. Is a school district required to provide transportation to a student with disabilities who wants to take classes through Running Start?
A. A school district would be responsible for necessary transportation of a Running Start student to and from college if the student's Individualized Education Program (IEP) provides for Running Start enrollment in an institution of higher education.

Q-55. Can a school district deny a student’s application to enroll in Running Start if the student does not want a diploma from the district or the high school?
A. No. If the student meets all eligibility requirements, the school district cannot keep a student from participating.

Q-56. Can a college or university limit the proportion of Running Start students in any individual class?
A. No. A college cannot deny access to Running Start students for participation in any single course or program. Under the law, any policy adopted to limit Running Start enrollment must be generally applicable and related to physical facility limitations, operating funds limitations, academically efficient class size, or a student’s ability to benefit from a particular class, course or program.

Q-57. Can a school district impose a registration deadline or otherwise limit registration times for Running Start?
A. No. However, the college can impose a registration deadline. It is recommended that high schools and colleges work together to define a mutually agreeable deadline for registration. Schedules must include enough flexibility not to impose barriers on students’ Running Start participation. A complete Running Start Verification Form (RSEVF) must be in place prior to the start of the Running Start class.

Q-58. Must students disclose their immigration status on Running Start application forms?
A. No. Provided that the student meets the definition of an enrolled student pursuant to WAC 392-121-106, a student’s immigration status does not prohibit them from enrolling in classes that receive basic education funding, including Running Start. Residency is defined in WAC 392-137-115.

Q-59. Must students disclose their social security or Individual Tax Identification Number (ITIN) on Running Start application forms?
A. No. However, colleges may ask all students, including Running Start students, to provide their social security numbers or ITIN for federal tax reporting purposes. Under federal law, colleges must have a legally permissible need to collect this information, must inform individuals that disclosure is voluntary, and must explain the legal basis for seeking the numbers and how the college intends to use them.

Q-60. Can a student residing outside of Washington take online courses with Washington colleges through Running Start?
A. No. Running Start funding is only available to Washington State residents enrolled in a Washington State public high school and living in Washington. Residency is defined within WAC 392-137-115.

Q-61. Can a student who is attending a nonresident district pursuant a choice transfer to participate in Running Start at a college near their home district?
Yes. This can be accomplished in two ways. The choice district can completed a RSEVF with the college in the student’s home district and the college would report the student’s enrollment to the choice district. Or the choice district can enter into an inter-district agreement with the home district, releasing a portion of the student’s FTE for the home district to use for the student’s Running Start enrollment. Refer to Bulletin #008-14 for more information on choice transfers and inter-district agreements.
Q-62. May a high school seek reimbursement from a Running Start student for failure of a course?
   A. No.

Q-63. May colleges charge fees to Running Start students?
   A. Yes. Running Start students attending community and technical colleges must pay mandatory fees. Four-year institutions may charge technology fees. Colleges and universities must make available fee waivers for low-income Running Start students. A Running Start student shall be considered low income, and eligible for a fee waiver upon proof that the student is currently qualified to receive free or reduced-price lunch. Acceptable documentation of low-income status may also include:
   A. Student has been deemed eligible for free-reduced-price lunches in the past five years
   B. Family income is equal to or less than 50 percent of the state median
   C. Family income is less than 200 percent of the federal poverty level
   D. Receiving any state or federal assistance funds
   E. Foster youth
   Note: Consumable supplies, textbooks, and other materials retained by the student" are not within the definition of fees and therefore not subject to the mandatory low-income waiver provisions.

Q-64. What is the credit maximum for student tuition and when do colleges charge extra tuition for overloads taken by students?
   A. Running Start students may enroll tuition-free for a maximum of 15 credits per quarter or a combined 1.20 FTE. When a Running Start student seeks more credits, colleges should charge appropriate per-credit rates for any credits beyond the 15 credit maximum or beyond 1.20 FTE, up to the maximum credits allowed for all enrolled students by institutional policy.

Q-65. Can school districts assess a fine or fee against students for failing Running Start courses, withdrawing from Running Start courses, or never showing up for Running Start courses?
   A. No.

Q-66. Can GET (Guaranteed Education Tuition) credits be used to pay for unsubsidized college tuition?
   A. If enrolled in credits above and beyond those authorized for Running Start, Guaranteed Education Tuition (GET) funds may be used to cover qualified expenses such as tuition charges, fees, and books/supplies. However, it may be more advantageous to use GET units for qualified expenses following Running Start enrollment.

Q-67. Are low income tuition waivers available for community and technical college students who want to take additional credits above the combined 1.20 FTE limit?
   A. Low income Running Start students at the community and technical colleges are eligible for tuition waivers for credits they choose to take above the 1.20 FTE or 15 credits. Low income may be defined as eligible for free or reduced-price lunch at the high school – check requirements per local college.

Q-68. Are community and technical colleges Running Start students able to receive a tuition waiver for one additional college credit if they are taking 9 RS Tuition-Free College Credits (0.60 FTE)?
   A. Yes. The State Board for Community and Technical Colleges approved an additional tuition waiver for one college credit for those Running Start students with eligibility per the Running Start Enrollment Verification Form for exactly 9 Running Start Tuition-Free College Credits (0.60 FTE) who enroll for exactly 10 college credits. The 10th credit of tuition will be waived in cashiering using Financial Aid Program Code (FAPC) of
W8A. The waiver is only for tuition. If the Running Start student registers for anything other than 10 credits exactly, they will not be eligible for this waiver.

QUESTIONS & ANSWERS
Foreign Exchange / International Students / Study Abroad

Q-69. Are foreign exchange students eligible to participate in Running Start?
A. Yes. Based upon reviews of federal and state law, it is determined that a J-1 visa “Exchange Visitor” student who has enrolled in the eleventh or the twelfth grade is eligible to participate in Running Start. J-1 visa students must be mindful of any restrictions on enrollment established by the student’s exchange program sponsor and must comply with all federal requirements.

Students with F-1 “Academic Student” visas who attend secondary school, must pay the school the full cost of education by repaying the school system for the full, unsubsidized, per capita cost of providing the education. As such, they cannot be claimed for state funding under the Running Start program.

Students with visas in other categories should check with the U.S. Embassy or Consulate that processed their visa application to ensure that Running Start enrollment is consistent with the terms of their visas.

Q-70. Can Running Start students participate in study abroad programs offered by their college?
A. Yes. Running Start students have access to all the classes offered in the college catalog. The student can be claimed for the standard Running Start reimbursement rate. Students are responsible for any additional costs.

QUESTIONS & ANSWERS
Graduation Requirements

Q-71. Can the district require progress toward the district diploma and require that students not only earn credits, but complete other requirements for graduation, such as the High School and Beyond Plan or a senior project?
A. Yes. Students who are seeking a high school diploma from a school district must meet all requirements of the state and the district. However, the intent of Running Start law is to encourage maximum student access to the Running Start program. Districts should not adopt policies and procedures that intentionally create barriers to student participation in the program. Requiring daily attendance in a culminating project class would logically hinder participation. Districts that have such requirements are strongly encouraged to offer accommodations to students participating in Running Start.

Q-72. Does a student seeking a high school diploma through an associate degree at the college need to complete local school district requirements?
A. No. Running Start students who earn an associate degree may request a high school diploma from the college. If a student fails to earn an associate’s degree, he or she would need to meet the requirements of the district to be awarded a high school diploma through the district.

Q-73. Can a student have all the credits for a diploma and still attend Running Start if she does not take the step of graduating?
A. Yes. A student who has not as of the beginning of a school year earned the credits needed for a high school diploma is eligible to attend Running Start until the end of the school year. Students who have completed all the credits needed for high school graduation before the beginning of a school year are not eligible to participate in Running Start. WAC 392-169-020

Q-74. Can a Running Start student who earns an associate degree from a college receive a high school diploma from that college?
A. Yes. The community and technical colleges are authorized to issue high school diplomas for Running Start students who enroll in the college and complete an associate degree. Students must provide a written request to the college registrar’s office (or designee) to receive a high school diploma from the college. RCW 28B.50.535.

Q-75. When can Running Start students who have completed their associate degree request the college-based high school diploma?

A. A Running Start student may request the college-based high school diploma when they apply for graduation with their associate degree or anytime thereafter.

Q-76. Should secondary schools continue to track a student’s graduation status if the student has indicated intent to pursue his or her high school diploma through a college?

A. Yes. All Running Start students are considered public high school students and as such should be served and treated like all other high school students. Providing all enrolled students with guidance as to graduation requirements and status is consistent with the guidance role of the high school, regardless of student intent relative to possible alternative graduation options.

For purposes of graduation rates (and related Adequate Yearly Progress implications), students who are successful in earning their high school diploma under the provisions of RCW 28B.50.535 will count as graduates of the home high school, and students who are unsuccessful in completing graduation requirements either through the school district or under the provisions of RCW 28B.50.535 will be considered non-graduates.

Q-77. If a student earns a high school diploma through the college, how would the secondary school document the student as a graduate, and thereby get credit that the student graduated?

A. When the high school is informed by the college that the student has earned a high school diploma issued by the college under the provisions of RCW 28B.50.535 the high school may withdraw the student using the Withdrawal code “GA” (Graduated through associate degree).

Q-78. If Running Start students earn associate degrees after their expected graduation dates, can they be documented in their student records as an extended graduation student so they will not count against the secondary schools for Adequate Yearly Progress (AYP)?

A. Yes. If students retain Running Start eligibility as a second-year senior student and completed remaining requirements for an associate degree, the high school, if informed by the college, could code such students “GA.”

QUESTIONS & ANSWERS
Homeschool / Private School Students

Q-79. May home school and private school students enroll in the Running Start Program?

A. Yes. Any student seeking credit through Running Start must enroll through the local public school district or high school, have a completed Running Start Verification Form in place for each term and each college, and have obtained junior or senior standing. Junior or senior standing is determined in accordance with a school district’s grade placement policies. The home school student so enrolled does not have to attend classes in the public high school in order to participate in Running Start. Students receiving home-based instruction under chapter 28A.200 RCW and students attending private schools approved under chapter 28A.195 RCW are not required to meet the student learning goals, obtain a certificate of academic achievement or a certificate of individual achievement to graduate from high school, or to master the essential academic learning requirements. RCW 28A.600.310(1)

For state and federal accountability reporting purposes: A student receiving home-based instruction enrolling in a public high school for the sole purpose of participating in courses or programs offered by institutions of higher education shall not be counted by the school district if the student’s parents or guardians filed a declaration of intent to provide home-based instruction and the student received home-based instruction during the school year before the school year in which the student intends to participate in courses or programs offered by the institution of higher education.
Note: Enrolling any student in the Running Start program means that the student is also enrolled as a public high school student in order to access state funding allotted for the Running Start program.

Q-80. Do homeschool families need to have a Declaration of Intent on file for the year preceding Running Start participation?
A. No. See OSPI Bulletin No. 098-07.

Q-81. Do homeschool students enrolled in Running Start need to complete local district graduation requirements if seeking a diploma through the associate degree?
A. No. See RCW 28B.50.535 (2).

Q-82. How is junior/senior standing determined for private school and home school students who wish to participate in Running Start?
A. For students seeking admission to Running Start, it is the responsibility of the school district to establish grade placement criteria. Once that grade placement is made, making the student eligible, a change to another school district will not alter the initial grade placement, consistent with WAC 392-169-020(2). Some schools consider age appropriateness; others review credits and prior learning. In other cases, a standardized achievement test may be used in the absence of adequate documentation of a student's home-based education. Any district criteria used to establish grade placement must be applied uniformly to students, regardless of intent to enroll in Running Start or intent to graduate from the high school. See Q-237.

Q-83. Can parents appeal local school district grade placement eligibility decisions?
A. This is a local decision. Parents may appeal only if the district has a policy/procedure for such appeal. See WAC 392-169-020(3).

Q-84. A homeschool student is in 11th grade, but wants to take a year off next year as a declared homeschool student to then return the following year and become a 12th grader to do Running Start. Would this student be able to return after one year off and do Running Start as a 12th grader?
A. It is up to the resident district to establish and interpret grade placement to students who enroll. In this case, the student could potentially be placed as either a 12th grade student or as a second-year senior. WAC 392-169-020(3)

Q-85. A homeschool student did not utilize third quarter (Spring) of Grade 11 eligibility due to illness. Can that third quarter be carried over so that the student can utilize six quarters of enrollment?
A. No. Junior year eligibility would be complete. However, the student would be eligible for the three quarters of 12th grade and may be eligible for the second-year senior year. WAC 392-169-055(4) Running Start eligibility is not based on six quarters. It is based on two academic years for junior and senior standing only.

Q-86. Does a school district have to post Running Start course grades in the grade history file of a homeschool student who is only taking Running Start classes?
A. Yes. All earned credit must be recorded on an official school transcript.

Q-87. May a school district or school award a diploma to a private school student who enrolls in the public district, but takes classes only through Running Start?
A. Yes, but only if all state and local school district graduation requirements are met.

Q-88. Are private school and home-based instruction students, who have enrolled in Running Start, exempt from the new 1.20 FTE limitation?
A. No. All students are eligible for up to a maximum of 1.00 FTE or 15 credits at the college and a combined high school and college FTE of 1.20. The completed Running Start Verification Form will inform the district, college, student and parents how the student's FTE will be claimed.

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QUESTION & ANSWERS
Parental Rights and Responsibilities

Q-89. Is the parent of a Running Start student entitled to review attendance and grade information held by the college or university?

A. Under federal law, students who attend postsecondary educational institutions hold the confidentiality rights to their education records. They have the right to consent prior to any disclosure of information from education records held by the postsecondary institution. However, an exception to the consent requirement allows the parents of dependent children to review their child's education records without the consent of the student. Proof of dependency is usually provided by a copy of the most recent year’s federal tax form showing that the parent claims the student as a dependent. Neither the age of the student nor the parent's status as a custodial parent is relevant. If a student is claimed as a dependent by either parent for tax purposes, then either parent may have access under this provision. See 34 CFR § 99.31(a)(8).

Q-90. May Running Start students participate in field trips that are scheduled as a part of the college course?

A. Yes, but written parental permission should be obtained for all field trips for Running Start students under the age of 18. If parents do not give permission, faculty should consider providing alternative options to that student. Most Running Start Coordinators collect a blanket permission form early in the enrollment process.

QUESTION & ANSWERS
Student Activities

Q-91. May Running Start students participate in college or university campus activities, such as student government, organizations, and clubs?

A. Yes. With the exception of intercollegiate sports, Running Start students may participate in any activities on the college/university campus, consistent with the institution’s general requirements for participation in extracurricular activities.

Q-92. May Running Start Students participate in high school activities including sports?

A. Yes. Running Start students may participate in any high school activities including sports, consistent with the high school and school district's own eligibility requirements and Washington Intercollegiate Activities Association (WIAA) guidelines. NOTE: WIAA guidelines allow participation by Running Start students.

Q-93. Can a school prohibit a student from participating in the high school graduation ceremony, taking classes at the high school, or participating in extracurricular activities if the student is choosing to receive a high school diploma from the college?

A. Running Start students and parents should be informed as to state rules relative to eligibility to enroll in classes at the high school, as well as participate in extracurricular activities. Participation in the high school graduation ceremony is to be determined by local district policy and is not linked to state statute related to diploma requirements and should be covered in parent and student guidance.

Q-94. Can a school district or high school preclude a student from being eligible to be senior class valedictorian or senior class salutatorian if the student enrolls in one or more classes via Running Start?

A. Such preclusion could violate equal protection principles. A 12th grade Running Start student and a 12th grade regular high school student are each entitled to participate equally in a high school graduation ceremony. A school should have criteria, other than mere status as a Running Start student, for these honors. For example, if the sole criterion for being selected were a high grade point average (GPA), a Running Start student with a high GPA would be just as eligible as a non-Running Start student with a high GPA.
GPA. On the other hand, if the eligibility threshold is a high GPA, coupled with a certain level of participation in class or school activities (e.g., serving as class officer or other leadership activity), it is possible that a Running Start student would have a more difficult time qualifying.

QUESTIONS & ANSWERS

Transcript Information

Q-95. When a student in Running Start drops a class at the college, and receives a "W" on their college transcript, should the high school post the grade as an "F" on the high school transcript?
A. It must be posted as a "W" on the high school transcript.

Q-96. If a Running Start student fails to pay his fees to a college, but otherwise completes the coursework satisfactorily, can the college withhold his grades? Can the student be prevented from graduating from high school?
A. The answer to the first question lies in the applicable policy of the particular institution. The answer to the second question is no. The failure to pay college fees related to the earning of college credit via Running Start is separate from the issue of whether the student satisfactorily met the course requirements to pass and apply the earned credits toward high school graduation. The college is limited to withholding the student's grades only pertaining to issuing the student's college transcript. In the situation described above, the high school counselor and the Running Start coordinator at the college must communicate with one another in order for the high school to be apprised of the student's grade. It is possible for a student to receive high school credit, but not college credit, in the situation described.

Q-97. Are all Running Start courses shown on the high school transcript?
A. Yes. Running Start courses need to be recorded on the transcript. The standardized transcript must contain a designation of "R" for courses completed and credit earned through Running Start. WAC 392-415-070

Q-98. Are colleges required to send individual transcripts to school districts in order to provide evidence of successful completion of courses taken through the program?
A. No. Nothing in law or administrative code (WAC 392-169-085) mandates that a school district must receive an official transcript from the college. The college must supply “evidence” of successful completion of courses. Evidence may include college-generated spreadsheets.

Q-99. How does the high school transcribe a grade from a college class through Running Start if the college uses a different grading scale than the high school (e.g., the college bases a B- on a 2.6 and the high school uses 2.7)? Will the student have different grades on the high school and college transcripts?
A. It is possible that the respective transcripts will show different grades. However, the high school transcript needs to record the grade in compliance with WAC 392-415-050. The high school would transcribe the grade appropriate to the rules for K-12 and the college would transcribe the grade appropriate to its policy.