



Middle School Students Keeping High School Credit FAQ

September 2024

(Please check this document again in the Spring for any legislative updates.)

Q: When does this change take effect?

A: It becomes a requirement when it is officially published as an administrative rule. We estimate that it will be published June 10th, 2024. Please note this rule was not in place during the 2024-25 registration period, so some procedures to accurately record when a student keeps the high school credit earned will not be available until registration for the 2025-26 school year.

Q: Can it be used retroactively so that middle school students (including those in the 2023-24 school year) who took a high school course before June 10th, 2024, can keep the high school credit?

A: It was not a requirement to issue high school credit to a student who passed a high school course prior to this rule change, so whatever your policy was at that time is sufficient to stand.

Q: Is earning credit before grade 9 good for every student?

A: Each student and situation is different, and school counselors should work with the family to inform them of the potential consequences of earning high school credit before grade 9.

- For example, the course taken will be recorded in the student's high school transcript, so grades earned will be included in the student's 9th grade GPA.
- The credit, for high school graduation purposes, is guaranteed (if the student successfully earns it), however, **the effect on scholarship and college/university eligibility is unknown and may remove a student's eligibility for a scholarship or admittance.** Please make sure the family knows to check with the scholarships and colleges/universities that their student is interested in, to check on whether **courses taken before grade 9 could affect their eligibility status.**



- High school courses taken before grade 9 are intended for students who would like to graduate early.

Q: Does anything need to be done in advance, for the student taking the high school course, to keep the high school credit that they earn?

A: Yes, the student, family, and school counselor should meet to talk about earning high school credit in advance of grade 9. This discussion should include information about unintended consequences of earning credit early, and the Plan for College and Career Readiness (PCCR) should be updated to reflect the intention to graduate early.

Q: What about health courses, I thought those had to be taken during certain grade levels?

A: Yes, Health I and Health II are guided by Utah State code [53G-10 part 4](#) which limit the years in which a student is eligible to take those courses. For more information, please visit the [USB E Health webpage](#).

Q: Can a high school student who took a high school course before grade 9 ask to have the credit applied to their 9th grade transcript after they are already in high school?

A: This requires a nuanced answer. If a student intentionally took a high school course to earn credits before grade 9, the high school course number should have been used and the PCCR should have been updated to include the intent to graduate early. If that credit was inadvertently left off the student's transcript, then the credit may be applied to their transcript to correct the error. **However**, if a student took a course to fulfill a middle school requirement and/or no PCCR was updated to indicate the student was taking the course to earn the high school credit and graduate early, then no high school credit should be recorded on the transcript. Combing through middle school schedules after the fact to find credits that could have been applied to a high school transcript would be inappropriate.



Q: Will earning high school credit before grade 9 affect Opportunity Scholarship eligibility?

A: The [Opportunity Scholarship website](#) states, “The 3 advanced courses **must be completed in grades 9-12** and must be completed prior to high school graduation.” Only the 3 advanced courses are prohibited from being counted toward eligibility if taken before grade 9.

Note: Assuming the student meets the other scholarship requirements, if they completed additional eligible advanced courses listed on the website in grades 9-12, to fulfill the 3 advanced course requirement, then the student could still meet the requirements. The Opportunity Scholarship does not look at what other courses a student completed before grade 9 when determining eligibility for the Opportunity Scholarship.

[Questions can be answered via email:scholarships@ushe.edu](mailto:scholarships@ushe.edu)

(801) 646-4812

Q: I thought the NCAA (National Collegiate Athletic Association) did not recognize credit before grade 9, is that true?

A: The NCAA has always recognized some credits, but not others. Rather than LEAs trying to keep up with changes to the division eligibility requirements, guide families to check on scholarship and college entry eligibility before having their student earn high school credits before grade 9.

Q: Will the eligibility for participation in Utah High School Athletics Association (UHSAA) be affected by a middle school student taking high school courses in advance of grade 9?

A: The UHSAA was contacted May 15, 2024, and has stated that eligibility begins when a student begins grade 9, rather than when a student takes a high school course.



Q: What about classes that include students from multiple grade levels (e.g., an art class with grades 7-9) in the same class?

A: Courses are attached to grade bands which indicate what grade level the course is intended for. For example, Art Foundations 1 (02010000060) is meant for grades 7-8. High School Art Foundations (02010000061) is meant for grades 9-12. Students in grades 7-8 can be assigned to the art course for their grade band and the 9th grade students would be assigned the unique course code for the high school grade band. In this way, the middle school students are taking their required art course, and the high school students are earning art credit. The teacher may use similar instructional strategies and assignments to teach and assess the standards associated with each course. In essence, the students are NOT in the same course, however they are learning with the same teacher at the same time.

Q: What should be done with courses that have cactus numbers with larger grade bands that span across middle school and high school (e.g., Orchestra courses) and there is no other CACTUS course number that can separate them?

A: The USBE is considering creating new CACTUS numbers for additional courses (available to be used SY 2025-26) to differentiate between middle school and high school. Regardless of what course code happens to be used, R277-700 does not allow a high school course to replace a middle school requirement. So, even if a student is in a course with high school students and a high school CACTUS course code was used, that does not mean that the middle school students in the course will be earning high school credit. If the course is fulfilling a middle school requirement, no high school credit should be awarded.

Q: Can my school decide to just use the high school cactus course number for all students in a combined middle/high school class period and have all the middle school students earn high school credit?

A: No, R277-700-3-(4) states, “An LEA may not use high school courses to replace middle school educational requirements.” Since a student cannot use a



high school course to replace a middle school requirement, the best practice for a course with mixed grade levels is to separate the course numbers between middle school and high school (see example with foundational art above). If there is no division of course numbers available, the only indicator that a student opted to take the course for high school credit is that the student would have already fulfilled their middle school requirement and the PCCR would indicate that the student was taking the course specifically for high school credit.

Q: Can middle school students take high school demonstrated competency assessments and keep the credit if they pass the assessment?

A: The wording of R277-700-3(3)(a) states, “Through recording of credits in a student’s transcripts for grades 9-12, for purposes of high school graduation, an LEA shall recognize high school credits earned before grade 9.” Since demonstrated competency assessments (DCA) is a pathway to earn credit, then a middle school student who takes and passes a DCA may keep the credit.

Caution: Some scholarships and college entry requirements may not accept DCAs, regardless of the year they were taken. DCAs also have the option to be pass/fail. The combination of a DCA, credit earned before grade 9 and possible pass/fail score instead of letter grade makes this option especially complex for a student’s future options. Parents should be counseled to make sure that a DCA and/or credit earned before grade 9 does not cause eligibility issues for scholarships or college entry requirements. The high school credit is guaranteed, however, there may be other unintended consequences that are unknown.

Q: How does the credit make it on a high school transcript?

A: The school registrar should record the course in the grade 9 transcript regardless of the middle school grade that the student was in during the course. It is important, however, to have the course name indicate when the credit was earned. This provides transparency of the actual timeline while also making sure that the graduation credit is acknowledged. One way this can be done is by



adding the grade level or date to the course name when entering it into the transcript.

Q: Can the middle school student earn original credit through a platform like Edgenuity, or does the credit have to be earned in a classroom?

A: Any pathway that you allow your high school students to earn original credit is allowable for a middle school student, however, if a platform-based course is not already a service offered by a middle school, then this option does not need to be provided. **Note: Platform-based instruction is not a demonstrated competency assessment and is meant for a student to obtain instruction before being assessed. Care should be taken to make families aware that a platform-based learning program relies on a student's ability to navigate the content without assistance from an instructor. Careful consideration of the student's success should be taken when direct access to an instructor is not provided.** Platform-based learning does not include courses taken through the SOEP (Statewide Online Education Program).

Q: Can middle school students take courses from anywhere and have it count toward their high school graduation?

A: No, just like courses taken by high school students, high school credit must be earned from a Cognia-accredited institution to be awarded credit. If a student takes a course from a non-Cognia accredited source, the LEA may provide a demonstrated competency assessment (DCA) to check for competency in the course standards before awarding credit. ([R277-705-3\(3\) & \(4\)](#)) This, however, would be providing credit for the DCA and not for credit from an unaccredited institution.



Q: How might this affect high school CTE (Career and Technical Education) funding if a middle school student takes a high school CTE course?

A: CTE is funded for grades 9-12 only, so any middle school student taking a high school CTE course would not be included in the student count for CTE funding. Registration for competitions should reflect the student's current grade level, rather than being based on the level of course they are taking.

Questions may be directed to cathy.gray@schools.utah.gov