

1680 Duke Street  
Suite 500  
Alexandria, VA 22314  
703-535-1625  
www.nacol.org



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April 13, 2006

Gaston Caperton  
President  
The College Board  
45 Columbus Avenue  
New York, NY 10023-6992

Dear President Caperton:

The North American Council for Online Learning (NACOL) represents more than 400 members and online learning programs across the United States. NACOL's members offer thousands of courses, including Advanced Placement (AP) courses, to hundreds of thousands of students. According to the National Center for Educational Statistics, the primary reason that students take an online or distance education course in secondary school is that the course is otherwise unavailable at their school. Half of all courses offered in distance education are Advanced Placement courses. Online learning is increasing access to the most underserved students in the U.S. to rigorous AP coursework. NACOL is committed to ensuring all students have access to the best educational opportunities regardless of geography, background or family income-level.

That is why we are gravely concerned about the College Board's recently enacted auditing criteria requiring supervised, "hands on" science labs for AP Science courses. The students served in online AP science courses are many of the same students that do not have access to AP in their high schools, or expensive laboratory equipment in schools, and these students seek online AP science courses with complete virtual labs as a way to complete the rigorous AP coursework. We urge the College Board to immediately reconsider its auditing criteria to avoid creating an impermeable barrier to AP Science for these students.

According to the College Board's website: "Recent studies by the U.S. Department of Education and the College Board...indicate that students who take rigorous and high-quality coursework -- precisely the kind offered through Advanced Placement courses and exams -- are more likely to complete a bachelor's degree in four years or less. By expanding access to and increasing

equity in AP, the College Board strives to give traditionally underserved and low-income students the opportunity to obtain the skills needed to succeed in college.”

As Education Secretary Margaret Spellings notes, 40 percent of America’s high schools do not offer AP courses at all. Rural students, minority students and low income students are the most likely to have no access in their schools to AP courses, thus no access to AP Science courses and labs. The students at greatest risk have the most to lose.

Please reconsider the language in the criteria and address the research showing virtual “dry” experiments as valuable by allowing students to improve their skills in deductive reasoning, hypothesis formation and testing as effectively as through “wet” or hands-on experiments. Skills in recording, reporting and interpreting data are also effectively developed through these virtual tasks. Course design for learning outcomes is the key issue, not delivery mode. Student results on the AP Science exam are what should matter, not the material location of a student learning experience -- in other words, “whether” they learned, not “where” they learned. Rather than restrict virtual labs, we urge the College Board to join us in ensuring that they are offered appropriately. NACOL fully supports quality measures and criteria resulting in increased student achievement.

We realize that negotiations should and will occur over time. However, our students need access and equal opportunities to take AP without promulgating artificial barriers of delivery modes that suit one group of students over students that have less access.

To conclude, we are committed to the principles outlined above and will use every tool at our disposal to help ensure equal or better access for the students we serve who need AP courses to improve access. It is our collective intention to work together to enact changes in the criteria and ensure all students have access to the highest quality education available in the 21<sup>st</sup> century.

Please join us in our efforts to increase access while raising educational standards and opportunities.

Thank you for your consideration.

Sincerely,



Susan D. Patrick  
President and CEO

SDP/lw