



The Steering Committee of the College and High School Alliance appreciates the opportunity to comment again on the “Agency Information Collection Activities; Comment Request; Experimental Sites Initiative Reporting Tool 2017.” The College in High School Alliance is a coalition of leading national, state, and local organizations committed to policies that support high-quality dual or concurrent enrollment and early college high school programs. The CHSA believes that greater support for these models at the federal, state, and local levels will significantly improve the secondary and postsecondary outcomes of students, particularly those from low-income or middle-class backgrounds and underserved populations. Our comments continue to specifically address the experimental site for dual enrollment.

In our first round of comments, we asked the Department to consider including additional descriptive questions in its information collection activities in order to learn valuable lessons about the impact of expanding financial aid eligibility of younger students. The Department declined to do so in its response to our comments, arguing that the proposed questions “are beyond the scope of ‘assessing the effect of a change in Title IV regulations.’”

We respectfully disagree that an evaluation of program design is outside the purview of the Department in assessing the effect of a change to Title IV regulations. In its initial “Notice Inviting Postsecondary Educational Institutions To Participate in Experiments Under the Experimental Sites Initiative” for the dual enrollment experiment, the Department appeared to be conscious of the importance of program design in the evaluation of the experiment and assessing its impact. In the Notice when discussing the evaluation, it states:

“Participating institutions will be required to participate in annual surveys that collect information about the institution’s dual enrollment arrangement(s) and any unforeseen challenges. This information may include the characteristics of the institution’s dual enrollment arrangement (e.g., tuition and fees, caps on credits earned, **support services provided, instructional delivery methods, and faculty characteristics**).” (Emphasis added)

Our proposed institutional questions are aligned with the characteristics that institutions were told to expect they would be asked to report on, and are critical in assessing the effect of a change to Title IV regulations. The Department also went so far in its initial Notice as to set eligibility criteria that went beyond Title IV requirements, by requiring that students be on a structured pathway to a degree or credential, that they have the opportunity to earn at least 12 credit hours while dually enrolled, and that institutions provide “appropriate student support services, such as academic tutoring, high school to college transition support, guidance counseling, or other comparable services designed to increase student preparation for and success in postsecondary education.”

In its initial design of this experiment, the Department clearly recognized that a key component to the success of the experiment would be how institutions structured their programs and the support services that students were offered. We therefore urge the Department to follow through and ensure that the evaluation also look at these important questions, so that we may understand what role program design played in the determining the results of the experiment.

ICR Data Collection Item - Institutional

We propose the following additional questions, developed in collaboration with the New America Foundation, that should be included for the dual enrollment experimental site:

- What are the credentials of teachers in the dual enrollment program under this experiment?
- What professional development opportunities are offered to dual enrollment educators participating in the program, if any?
- Is the program offered at the high school or at the college?
- What process did the accreditor follow in approving the program under this experiment?
- What, if any, articulation agreements does the college providing credit under this experiment have with other colleges and universities?
- What, if any, admissions standards did the college establish for students to participate in the dual enrollment program?
- Are students who do not meet academic readiness standards in a particular area of study given access to remediation opportunities not funded by federal Pell Grants? If so, how are students identified for remediation, and how and by whom is remediation delivered?
- What systems did the participating institution have to implement to administer federal financial aid for students in the experiment?
- What strategies did the college need in order to offer the required student advising and supports to students in the experiment?
- What dual enrollment degree pathways did the college provide to students in the experiment?
- What STEM and/or workforce alignment programs for students did the college include in the experiment?

ICR Data Collection Item – Student

We propose the following additional descriptive questions that should be included for the dual enrollment experimental site:

- What is the student's date of entry to the program?
- What is the student's date of completion from the program?
- How many transferable credits/hours did the student attempt in the most recent award year?
- How many transferable credits/hours did the student complete in the most recent award year?
- What is the retention rate for participation in the experiment?
- What is the percentage of students earning degrees or credentials in the experiment?
- What is the per student and total amount of Pell funding used in the experiment?

Sincerely,

Bard College
Jobs for the Future
KnowledgeWorks
Middle College National Consortium
National Alliance of Concurrent Enrollment Partnerships