



COLLEGE IN HIGH SCHOOL  
ALLIANCE

## Recommendations for the Biden-Harris Administration to Support Dual Enrollment, Concurrent Enrollment & Early College High Schools

### ► The Opportunity

In America's public education system, opportunity gaps exist that disadvantage students based on race, family income, and zip code, among other factors. In today's economy, where jobs increasingly require higher levels of education, this opportunity gap presents a gulf between disadvantaged communities and the middle class. The economic impacts of COVID-19 illustrate this disparity well—in April 2020, [the unemployment rate rose](#) to 21.2 percent for those with less than a high school degree, more than twice the 8.4 percent unemployment rate for those with a bachelor's degree or higher, with Black, Latinx, and Native American communities being disproportionately affected.

This is both a moment of crisis and opportunity. For a strong recovery, it is critical that policymakers invest in seamless pathways for students, especially those from low-income and underrepresented backgrounds, to postsecondary education and the workforce. **We believe that college in high school programs—dual enrollment, concurrent enrollment, and early college high schools—are among the most effective solutions for achieving this goal.** These programs allow students the opportunity to take credit-bearing college courses while still in high school, thereby creating a smooth transition from high school to postsecondary degrees in a range of fields. The evidence is consistent and clear that college in high school programs:

- [Increase the likelihood](#) of students completing a postsecondary degree, on time or early
- Have a strong return on investment, with a return of [15 to 1](#) for early college high schools
- Have [disproportionate, positive impacts](#) on low-income and underrepresented students.

The Steering Committee of the College in High School Alliance is pleased that President-Elect Biden's campaign recognized the importance of providing every secondary school student with a path to a successful career. We commend President-Elect Biden for including early college and dual enrollment in his plan for education, especially through the proposal to make Pell grants eligible for use in dual enrollment programs and for encouraging the inclusion of dual enrollment programs in grants to help community colleges increase their completion rates. We urge the incoming Biden Administration to build on this foundation and prioritize college in high school programs more widely as a way to increase college access, affordability, and completion, especially for low-income, historically underrepresented, and first generation college students.

This transition memo offers a set of policy recommendations, with a focus on college in high school programs as a critical lever of change. To date, federal policy has not recognized the unique opportunities, challenges, and importance of the young adult experience and has not created comprehensive policies and structures to support students ages 16-24, especially those facing opportunity gaps. **Prioritizing dual enrollment, concurrent enrollment, and early college high schools will provide a bridge over the widening opportunity gap, propelling underserved students towards success in higher education and our economy.**

The following are recommendations for how the federal government can establish a more accessible and effective education system by incentivizing and scaling college in high school programs with a focus on quality and equity.

### ► EXECUTIVE ACTION

- Create an Office of Postsecondary Transitions at the U.S. Department of Education to coordinate policies related to college in high school and other transition programs (first 100 days)
- Make college in high school programs a priority in Department of Education grants (first 100 days)
- Improve national data collection for college in high school programs

### ► STIMULUS RECOMMENDATION

- Create a Postsecondary Transition Innovation Grant as part of the next federal stimulus (first 100 days)

### ► LEGISLATIVE PRIORITIES

- Support and scale college in high school programs through secondary, postsecondary, and workforce development initiatives
- Allow eligible students to access Pell Grants for Department-approved college in high school programs
- Recruit, prepare, and retain teachers for college in high school programs



## What are College in High School Programs?

The term “college in high school” programs refers to postsecondary learning opportunities that allow students to earn college credit from an institution of higher education (IHE) during high school. This term was coined by the [College in High School Alliance](#) (CHSA), a national coalition of over 85 organizations formed in 2016 to advocate for public policies supportive of these programs. As defined by CHSA, college in high school programs are partnerships between school systems and accredited institutions of higher education that offer high school-age students an **intentionally-designed, authentic postsecondary experience leading to officially transcribed and transferable college credit toward a recognized postsecondary degree or credential**. The most widely referenced college in high school programs are dual enrollment, concurrent enrollment, and early college high schools.

## The Evidence

Numerous rigorous research studies have demonstrated that college in high school programs significantly increase rates of postsecondary enrollment and degree attainment, particularly for students from low-income and historically under-represented backgrounds. These programs have a strong return on investment, as they leverage high school funding to provide free college programming and they increase students’ degree completion rates and reduce the time to degree. Illustrating this, a 2019 cost-benefit analysis conducted by [American Institutes for Research](#) (AIR) found a savings of approximately \$54,000 per student and a benefit-to-cost ratio of 15-1 from early college high schools. A randomized control trial study by AIR found that students who attend early college high schools are significantly more likely than their peers to graduate from high school, enroll in college, and earn a degree. The [What Works Clearinghouse](#) (WWC) reviewed dozens of studies against their strict criteria and found a medium-to-large evidence base that shows positive impacts on college enrollment and completion from participating in dual enrollment.

## College in High School Best Practices

College in high school programs are effective because they offer students an academic challenge and a range of relevant and engaging pathways, from general studies/liberal arts programs that transfer to two- and four-year colleges to specific career pathways (approximately [one third](#) of college in high school programs have a CTE focus); they allow for personalized learning by enabling students to accelerate into areas of postsecondary and career interest; they integrate academic and socio-emotional support services; and they prepare students for transitions to two- and four-year colleges and careers by letting them start postsecondary education in a supportive environment. Many of the models, like early college high schools, are free of charge and designed to support students who have experienced opportunity gaps or who have risk factors when it comes to college access and success. The following are best practices for college in high school programs:

- Authentic college experiences
- Clear credit transfer pathways
- Courses that lead to a degree or credential
- Strong partnerships between K-12 and higher education
- Qualified instructors
- Robust student supports
- Program evaluation for continuous improvement
- Multiple measures to entry.



### I. Create an Office of Postsecondary Transitions at the U.S. Department of Education to Coordinate Policies Related to College in High School and Other Transition Programs

To effectively implement, support, and expand policies related to college in high school programs and other high school to college transition initiatives, the Department of Education should create an Office of Postsecondary Transitions. **Right now, there is no comprehensive federal policy framework or consistent point of contact at the Department whose responsibility it is to support the experience of young adults ages 16-24 as they transition between high school, college, and the workforce.** The mission of this office should be to break down silos between K-12, higher education, and employers; implement and support policies related to transition programs in the portfolio, including but not limited to dual enrollment, concurrent enrollment, and early college high schools; and incentivize and invest in innovative new approaches. This office will make it easier for programs to navigate the Department and its resources and policies, especially when guidance or regulations are conflicting (i.e. Title IX). This office can also serve as a liaison to offices in sister agencies, such as the Department of Labor, and foster greater inter-agency collaboration. Finally, the Office of Postsecondary Transitions can provide guidance to offices within the Department issuing innovation and other grants impacting or prioritizing postsecondary transition programs.

### II. Make College in High School Programs a Priority in U.S. Department of Education Grants

To increase the availability and accessibility of college in high school opportunities for students nationwide, we recommend that the Department of Education include access to early college high schools and dual and concurrent enrollment among its priorities for discretionary grants, with a focus on equitable access to high-quality programs. We recommend that the priority focus on expanding student access to high-quality postsecondary education during high school, especially for low-income and underrepresented students. The priority should reference the federal definitions of early college high schools and dual and concurrent enrollment included in the Every Student Succeeds Act.

### III. Create a Postsecondary Transition Innovation Grant as Part of the Next Federal Stimulus

Postsecondary transition programs will be critical to the COVID-19 recovery, in helping students obtain the education, training, and credentials needed to obtain family-sustaining jobs. This need is especially urgent because high school students have lost time in the classroom at a critical juncture in their educational and developmental trajectories.

Federal support is essential to avoid devastating cuts to secondary and postsecondary education. In the next federal stimulus package, **we urge the Biden Administration to explicitly prioritize the investment of stimulus funds in supporting college in high school programs.** Specifically, we recommend that the Department of Education issue a Postsecondary Transition Innovation Grant as part of the next federal stimulus to invest in new and evidence-based approaches to college access, affordability, and completion through partnerships between school districts, IHEs, employers, and other intermediaries, including college in high school programs, that strengthen the transition between secondary education, postsecondary education, and the workforce. Funding these collaborations will address an immediate need to support students for whom COVID-19 has caused the most disruption to their higher education and job trajectories. This fund could also become part of the Higher Education Act reauthorization.

To sustain and expand programming beyond the federal investment, we recommend that states or local educational agencies (LEAs) receiving federal funds be encouraged to **develop and/or advance a robust policy framework for the programming.** For dual enrollment and early college high schools, we recommend that state policy touch on the six key areas outlined in [Unlocking Potential: A State Policy Roadmap for Equity and Quality in College in High School Programs](#), notably:

1. Encouraging states to set equity goals and publicly report data towards meeting those goals around participation and success for students enrolled in dual enrollment or early college
2. Establishing quality assurance mechanisms for dual enrollment and early college, and implementing statewide credit transfer policies
3. Funding access to dual enrollment and early college for low-income students
4. Providing access to multiple course opportunities, including Career and Technical Education, and addressing eligibility requirements to ensure equitable participation
5. Developing initiatives to support teachers in securing the credentials necessary to teach advanced coursework, such as dual enrollment
6. Providing students with the support services necessary for their success

In addition, **any supplemental funding for COVID-19 relief provided through the Elementary and Secondary School Emergency Relief Fund or through the Higher Education Emergency Relief Fund should explicitly include college in high school programs as an allowable and encouraged use of funds.**



#### IV. Improve National Data Collection for College in High School Programs

Policymakers do not have a consistent national count of students participating in dual enrollment and early college programs. Currently, the Office for Civil Rights (OCR) data collection around dual enrollment, which has only been a mandatory reporting item since the 2015-2016 school year, is based on school district reporting that is not complete (with many districts not reporting as required or not fully reporting) and is not based on current year data.

The latest count of dual enrollment students conducted by the National Center for Education Statistics (NCES) is now over a decade old - from the 2009-2010 school year. Given the explosive growth in dual enrollment participation in many states, the lack of current data is a significant barrier for the policy and practitioner community, as we do not have a clear sense of how many students are participating and succeeding in dual enrollment programs.

We recommend that the Biden Administration begin working to develop a clear, national count of students participating and succeeding in dual enrollment and early college programs, either through encouraging or requiring greater compliance with OCR data collection or creating an additional process, such as through NCES, to ensure that policymakers and practitioners can evaluate program impact and assess policy interventions to address gaps in access and success.

#### V. Allow Eligible Students to Access Pell Grants for Department-approved College in High School Programs

We recommend that the Biden Administration work with Congress to allow financially eligible high school students to access their Pell Grants to participate in Department-approved dual enrollment and early college high school programs, with robust student protections and institutional eligibility criteria in place. This policy change will significantly increase access to these proven programs for low-income students and thereby improve their postsecondary success.

**A well designed policy to allow financially-eligible students to access Pell Grants so they can participate in free college programs during high school, with robust criteria for institutional eligibility and student protections, is a critical step in expanding access for students who can most benefit and making quality postsecondary pathways a central piece of the grade 9-16 educational fabric.** This policy change will unlock a funding stream to sustain and grow dual enrollment and early college high school programs serving low-income students, while maintaining the original intent of the Pell Grant program to increase college access and affordability for low-income students.

For this policy to be effective, quality controls and careful policy design are critical. First, to prevent students from being penalized for trying a challenging and accelerated course of study at an earlier age, we recommend that the Department

waive up to 4 semesters from the 12 semester Pell lifetime eligibility cap for participating students. Secondly, and equally importantly, participating college in high school programs should have to meet strict institutional eligibility criteria established by the Department. CHSA will be publishing a resource soon with recommended eligibility criteria.

We recommend that the Department require robust data reporting from participating institutions and conduct a rigorous evaluation of the impact of Pell for dual enrollment (internally, through the Institute of Education Sciences and/or through an external evaluation, funding permitting) to inform the policy moving forward. This is especially important because the Dual Enrollment Experimental Site was not evaluated by the Department.

Alongside this proposal, we support an **increase in the federal Pell grant**, ideally doubling the size of the maximum grant award, so students can cover more of the cost of college. Together, these two policy changes will significantly increase access, affordability, and completion for the nation's low-income students.

#### VI. Recruit, Prepare, and Retain Teachers for College in High School Programs

A major obstacle to expanding access to college in high school programs is the shortage of teachers with the credentials to teach college classes to high school students, a problem exacerbated as a result of COVID-19, when veteran teachers with more experience teaching advanced courses are retiring. This challenge can be addressed through opportunities for teachers to invest in their own education and through changes to teacher preparation programs. The field would benefit from federal leadership around teacher requirements and credentialing for dual enrollment that increases the overall pool of qualified instructors.

To this end, we urge the Biden Administration to create a **teacher grant program and/or open up existing programs**, such as the TEACH grant, **to help teachers gain content knowledge and training**, including advanced coursework in the content area and internships and externships (for career-aligned disciplines), necessary to teach in high-demand programs and fields, including dual enrollment programs. The federal government could also provide compensation incentives for teachers to obtain the additional training needed to teach these courses as part of the larger federal teacher compensation reform under consideration.

We also recommend the creation of a **competitive grant program for traditional and alternative teacher preparation programs** that prepare teachers for high-demand programs and fields, including dual enrollment and Career and Technical Education Programs. Right now, teacher education programs do not provide sufficient content training, creating a misalignment with educational needs and student demand. We recommend that Historically Black Colleges and Universities (HBCUs), Minority Serving Institutions (MSIs), and Tribal Colleges and Universities (TCUs) be given priority to grants in order to build a diverse pipeline of instructors.





Finally, we support the allowable use of funds in **Title II of the Higher Education Act** for upskilling aspiring dual enrollment instructors (including in CTE programs), by allowing teachers to complete the requisite graduate courses and/or fulfill externship requirements. This flexibility would mirror the flexibility in Title II in ESSA, for which dual enrollment and early college high schools are an allowable use.

### VII. Support & Scale College in High School Programs Through Secondary, Postsecondary, & Workforce Development Initiatives

We are pleased to see many recommendations from the campaign of President-Elect Biden's policy platform align with college in high school programs and goals, and many areas where college in high school programs can advance the Administration's agenda. For example, we are pleased to see dual enrollment and early college high school included in **high school redesign and improvement and secondary-post-secondary-workforce collaboration proposals**. To maximize impact and effectiveness, we urge federal investment to be used to develop, sustain, and expand college in high school programs in a broader range of initiatives, particularly around **college affordability and attainment**. The following are areas where we recommend that high-quality, equity-focused college in high school programs be allowable or encouraged uses of federal funds:

- Free college and college affordability initiatives
- College success grants for two- and four-year institutions
- Grants to HBCUs, MSIs, TCUs and low-resourced independent colleges and universities
- Cross sector collaboration between secondary schools, higher education, and the workforce
- High school redesign and improvement strategies.

Including allowable use provisions in ESSA yielded gains in access to college in high school programs and advanced state policy development. We hope the Biden Administration builds on this foundation through allowable and encouraged use language in its signature education initiatives and investments.

These recommendations are endorsed by the Steering Committee of the College in High School Alliance. In advance of the new Congress, CHSA is launching a Federal Policy Working Group of a diverse subset of its wider membership to develop additional consensus proposals. We look forward to sharing these additional proposals when completed. ■



Photo by Bradley Sawyer



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Images of Teachers and Students in Action