



The Honorable David Tilly
Iowa Department of Education,
Grimes State Office Building,
400 E. 14th St., Des Moines, IA 50319-0146

Dear Deputy Director Tilly,

The steering committee of the College in High School Alliance appreciates the opportunity to provide feedback on Iowa's draft State Plan under the Every Student Succeeds Act (ESSA). The College in High School Alliance (CHSA) is a coalition of leading national, state, and local organizations committed to policies that support high-quality dual enrollment, concurrent enrollment, and early college high schools. 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 and middle-class backgrounds.

ESSA presents a unique opportunity for states and districts to help more young people enter and complete college by implementing school designs that improve the transition between high school and higher education. Early college and dual enrollment opportunities, which introduce high school students to college coursework, offer the potential to accelerate progression into—and success in—postsecondary education for students of all backgrounds. ESSA explicitly encourages states to use these approaches.

Students who attend schools with high-quality dual enrollment (including concurrent enrollment) or early college designs are more likely to graduate high school, immediately enroll in college, and persist to completion than their peers. At the same time, these models provide students with significant flexibility in how to tailor their academic programs to their specific needs. They also meet a top priority of many families: reducing the time and cost for students to earn degrees and enter the workforce.

We strongly encourage Iowa to include access, participation, and completion of dual enrollment, concurrent enrollment, and early college high school as part of its Title I accountability system. A number of Iowa institutions already offer these successful programs, and by building access to advanced coursework into a broader indicator measuring access to advanced coursework, institutions will be encouraged to consider adding new programs or expanding their current options for students.

In the current draft of Iowa's plan, a Postsecondary College Readiness indicator that measures the number of high school graduates requiring remediation once enrolled in postsecondary education has been included. Building upon that indicator, by including a focus on expanding access, participation, and completion of quality dual enrollment, concurrent enrollment, and early college high school will assist in

improving results, as studies have shown that these models are effective in reducing the need of high school graduates to take remedial classes¹ and on improving overall college attainment.²

The College in High School Alliance proposes the following best practices in incorporating dual and concurrent enrollment and early college high school into State Accountability Systems:

1. Focus on completion of college courses, not just access to them.
2. Ensure each measure of college coursework is weighted meaningfully in the accountability system, with a meaningful denominator (such as the ninth-grade cohort).
3. Increase points awarded for greater numbers of college credit accumulated, including completion of a degree or credential.
4. Allow a range of models for participating in advanced coursework and earning college credit (e.g., dual enrollment, early college, AP, and IB).
5. Disaggregate various advanced coursework models and weight them equally.
6. Use consistent definitions of early college and dual and concurrent enrollment programs.
7. Build the necessary system and financial capacity to ensure widespread student access and success in quality college courses.

More detail on these recommendations and best practices, as well as other ways states can leverage ESSA in support of early college and dual enrollment, can be found in our guide, “How to Scale College in High School: A State Policy Guide for Implementing Dual Enrollment and Early College Designs Under the Every Student Succeeds Act,” available [here](#). ESSA provides opportunities to support dual enrollment, concurrent enrollment, and early college high schools not just through Title I’s accountability system, but also school improvement programs available under Title I, professional development for these programs under Title II, supporting English language learners as part of Title III, and are allowable uses for states and school districts as part of the Title IV Part A Student Success and Academic Enrichment grant program. More detail on those opportunities can be found in our State Policy Guide linked above, and we would be pleased to discuss them further.

We appreciate the opportunity to provide feedback, and understand the complexities that states are grappling with in establishing new systems under ESSA. We are happy to make ourselves available for a conversation with national experts about how to develop indicators for student and school success that include dual enrollment, concurrent enrollment, and early college high school if interested. If so, please contact Alexander Perry, Coordinator of the College in High School Alliance at alex@majoritygroup.com or (202) 431-7221.

Sincerely,

The Steering Committee of the College in High School Alliance

- Bard College
- Jobs for the Future
- KnowledgeWorks

¹ Colorado Department of Higher Education (2014), The Effects of Concurrent Enrollment on the College-Going and Remedial Education Rates of Colorado’s High School Students, Accessed on July 27, 2017: <http://higher.ed.colorado.gov/academics/concurrent/>

² Brian P. An, Educational Evaluation and Policy Analysis (2013), The Impact of Dual Enrollment on College Degree Attainment: Do Low-SES Students Benefit?, Accessed on July 27, 2017: <http://ies.ed.gov/ncee/wwc/Study/77095>

- Middle College National Consortium
- National Alliance of Concurrent Enrollment Partnerships

<http://www.collegeinhighschool.org>