



The Honorable Mark Johnson  
North Carolina Department of Public Instruction  
Education Building  
301 N. Wilmington Street  
Raleigh, NC 27601-2825

Dear State Superintendent Johnson,

The steering committee of the College in High School Alliance appreciates the opportunity to provide feedback on North Carolina'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.

North Carolina should take great pride in its status as a national leader in the early college high school movement, where it has over 75 early college high schools serving approximately 15,000 students. A 2014 study by the SERVE Center at the University of North Carolina at Greensboro compared students attending an early college high school in North Carolina to those who were not.<sup>1</sup> The study found:

- 92% of early college students were on-track to college in 9th grade compared to 85% in the control group,

---

<sup>1</sup> Edmunds, Dr. Julie, *Smoothing the Way to College: Impact of Early College High Schools*, SERVE Center, 2014, Accessed on July 26, 2017: [http://www.serve.org/uploads/docs/Gen%20Documents/Smoothing\\_the\\_way\\_to\\_college.pdf](http://www.serve.org/uploads/docs/Gen%20Documents/Smoothing_the_way_to_college.pdf)

- Early college students earned an average of 22 college credits while in high school compared to an average of less than 3 college credits received by students in the control group, and
- Early college students enrolled in college at a rate that was 15% points higher than the control group.

We strongly encourage North Carolina to include measures of access, participation, and completion of dual enrollment, concurrent enrollment, and early college high school as part of its Title I accountability system, and are disappointed to see the state's leadership in this area not reflected in its ESSA draft plan. We recommend that the state should continue to build upon its success, maintain the gains that have been made by North Carolina students, and continue to move forward with encouraging strong linkages between school districts and institutions of higher education. Including access, participation, and completion of advanced coursework into the state's accountability system would go a long way towards ensuring continued success.

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 III, 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](mailto: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
- Middle College National Consortium
- National Alliance of Concurrent Enrollment Partnerships

<http://www.collegeinhighschool.org>