



The Honorable Pedro A. Rivera
Pennsylvania Department of Education
P.O. Box 2120,
Richmond, VA 23218

Dear Secretary Rivera,

The steering committee of the College in High School Alliance appreciates the opportunity to provide feedback on Pennsylvania’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 are pleased to see Pennsylvania include supporting dual enrollment, concurrent enrollment, and early college high school as a priority for its funding under the Title II and Title IV Part A Student Success and Academic Enrichment grant program. Title II funding will allow local education authorities (LEAs) to provide professional development for educators to ensure they have access to the skills and credentials necessary to teach college-level coursework. Title IV Part A will provide the state and its school districts with new opportunities to focus on expanding quality programs, particularly when it can be used to provide new opportunities to low income students.

In addition, we strongly encourage Pennsylvania to include access, participation, and completion of dual enrollment, concurrent enrollment, and early college high school as part as part of its Title I accountability system. A number of Pennsylvania institutions already offer these successful programs, and by building access to advanced coursework into a broader indicator measuring college and career readiness,

institutions will be encouraged to consider adding new programs or expanding their current options for students.

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

<http://www.collegeinhighschool.org>