FUNDING FOR EQUITY:

Designing State Dual Enrollment Funding Models to Close Equity Gaps

JENNIFER ZINTH | ZINTH CONSULTING, LLC | OCTOBER 2019

COLLEGE IN HIGH SCHOOL
ALLIANCE

TABLE OF CONTENTS

PHOTOS COURTESY OF:

Allison Shelley/The Verbatim Agency for American Education: Images of Teachers and Students in Action. **https://deeperlearning4all.org/images/**

FUNDING FOR EQUITY:

Designing State Dual Enrollment Funding Models to Close Equity Gaps

JENNIFER ZINTH | ZINTH CONSULTING, LLC | OCTOBER 2019

Dual enrollment equity means that the student population in a state's dual enrollment program mirrors the demographic, socioeconomic and geographic diversity of the state's overall K-12 student population. If a state's K-12 population is 20% African American, 30% rural, and 50% eligible for free and reduced-price lunch, the dually enrolled student population in a state that has achieved dual enrollment equity is 20% African American, 30% rural, and 50% eligible for free and reduced-price lunch. (See sidebar for more on **dual enrollment data collection and reporting** – and other policy levers – that, along with dual enrollment funding models, provide critical supports to state dual enrollment equity efforts.)

Despite considerable recent gains in dual enrollment participation across the U.S., state and national data indicate challenging, persistent disparities in course access and program enrollment along geographic, demographic and socioeconomic lines. For example, data published in February 2019 from a nationally representative study of entering 9th graders in fall 2009 found that while 38% of White and Asian students took at least one dual enrollment course, just 27% of their Black and 30% of Hispanic peers did so (U.S. Department of Education, 2019). These data also bore out that as parental education level decreased, so did the likelihood that their student would take a dual enrollment course (U.S. Department of Education, 2019). Sadly, state-specific data from across the nation echo these findings.

The federal 2015-16 Civil Rights Data Collection further documented that the availability of dual enrollment opportunities varies substantially by high school characteristics. A 2018 analysis of the data revealed that while 52% of all American high schools lacked access to dual enrollment courses, 69% of high minority high schools did not offer dual enrollment coursework, more than twice the percentage of low minority high schools (33%) not providing dual enrollment opportunities (ExcelinEd, 2018). The report also noted that high poverty and small schools were significantly less likely than low poverty and large high schools to make dual enrollment coursework available.

DATA AND REPORTING AS AN EQUITY DRIVER

A dual enrollment funding model is one component, but by no means the only decisive factor in achieving dual enrollment equity. Defining the state's dual enrollment equity goal, and annually collecting, reporting and analyzing accurate state-level data on dual enrollment access and coursetaking, disaggregated by student and school characteristics, are also crucial to making progress toward dual enrollment equity. Currently, about 15 states annually collect and publicly report reliable disaggregated dual enrollment participation data for all public postsecondary institutions, while a handful of additional states publicly report such data on a less-than-annual basis, or annually for one postsecondary system but not all public postsecondary institutions within the state.

The College in High School Alliance (CHSA) recognizes dual enrollment funding models are part of a broader set of components essential to attaining dual enrollment equity. To this end, CHSA in partnership with the Level Up coalition administered by the Education Strategy Group recently released a resource, "Unlocking Potential: A State Policy Roadmap for Equity and Quality in College in High School Programs" **https://www.collegeinhighschool.org/state-policy-roadmap-1** that sets forth six policy levers that are all indispensable components of state efforts to realize dual enrollment equity. These six dual enrollment equity policy levers are:

1. **Equity Goal and Public Reporting:** States set an equitable, statewide public goal for increasing the participation and success of traditionally underserved student groups in college in high school programs, with clear, disaggregated public reporting and accountability for progress toward the goal.
2. **Program Integrity and Credit Transfer:** States support and promote high-quality college in high school programs through effective oversight and cross-sector collaboration between the K-12 and postsecondary sectors, as well as ensuring credit articulation.
3. **Finance:** States design funding mechanisms that remove financial barriers for low-income and moderate-income students to participate and excel in college level work in high school.
4. **Course Access and Availability:** States ensure that students are able to access college in high school courses, regardless of geography, with pathways that maximize opportunities for students to earn multiple college credits, and facilitate students exploring academic and career areas of interest while ensuring that those courses count toward high school graduation requirements.
5. **Instructor Capacity:** States develop strategies to recruit, support, and diversify the pool of instructors with the qualifications to teach college in high school while encouraging collaboration between K-12 and postsecondary partners as college in high school programs are scaled.
6. **Navigational Supports:** States prioritize the student navigational supports and advising needed to ensure student success in college in high school courses, particularly for those students historically underserved by these programs.

CHSA aspires to a national vision in which tuition poses no barrier to a student's participation in dual enrollment. The best dual enrollment funding approach is an equity-focused model that sustains and incentivizes participation among students, districts and institutions alike, while providing strong state (and national) return on investment.

For purposes of this brief, "dual enrollment" refers to college courses offered to high school students, regardless of course location, instructor type or modality. When discussing specific states' dual enrollment funding models, the appropriate terms for that state are used. College in high school programs, a term also used in this paper, span the spectrum of opportunities offering high school students early access to college courses including but not limited to: Concurrent Enrollment, Early College High Schools, P-TECH, Running Start, and Dual Enrollment.

THREE SUSTAINABLE FUNDING MODELS

This paper presents three approaches that eliminate student-borne tuition costs while supporting broad program access, as well as the states that have adopted those models and key considerations for policymakers.

However, state-level funding models that eliminate or minimize student-borne tuition costs potentially come with tradeoffs for state and local K-12 and postsecondary stakeholders. As a result, each model also raises questions state leaders must answer on political and financial "fit," to make sure equity aspirations are met, and that students, parents, K-12 and postsecondary decision makers find the program palatable. Given the many political and financial variables that must be considered, the best equity-driven dual enrollment funding model for one state may not be the best equity-driven dual enrollment funding model for another.

This paper is intended to help states identify a dual enrollment funding model that maintains a focus on equity while taking leaders' programmatic aspirations and a state's funding predispositions into account. Dual enrollment programs are complex, often more so from a policy standpoint. These multifaceted programs exist in both the K-12 and higher education policy and programmatic spaces. Many states address funding of these two sectors of education with vastly different approaches. In short, this topic is complex and nuanced.

Thus, in addressing funding to improve equity gaps in this paper we are working to simplify complex interwoven systems into more simplistic categories. We do this from a student cost perspective, what it costs the student to participate, as cost is an obvious equity barrier. Using this student lens, we define three categories:

1. Student pays no tuition,
2. Student pays reduced tuition,
3. Student pays anywhere from no to full tuition.

Within each category, we describe the different finance approaches states utilize to minimize or eliminate student-borne tuition expenses (and sometimes other participation costs).

Having students pay dual enrollment tuition is a barrier to equity of engagement. **Multiple states have removed this barrier,** and implemented policy and funding systems to ensure that students and parents do not shoulder a tuition burden.

1

STUDENT PAYS NO TUITION

State pays

Combination of state & district pay

District pays

2

STUDENT PAYS REDUCED TUITION

Costs split between state and student, or district and student

3

STUDENT MAY PAY ANYWHERE FROM NO TO FULL TUITION

Local decision

For each of these finance approaches, this brief provides:

- The equity rationale for the model — what makes it appealing to states that have chosen it?
- Potential benefits and challenges the model presents for various state and local stakeholders
- Questions states need to ask themselves, to ensure program "fit" from a political, aspirational and financial perspective
- Best practices and lessons learned from states that have adopted the model.

States should also consider the extent to which federal sources, including Perkins, GEAR UP, or ESSA funds, can offset state investment in dual enrollment tuition and other program costs, to maximize long-term sustainability.

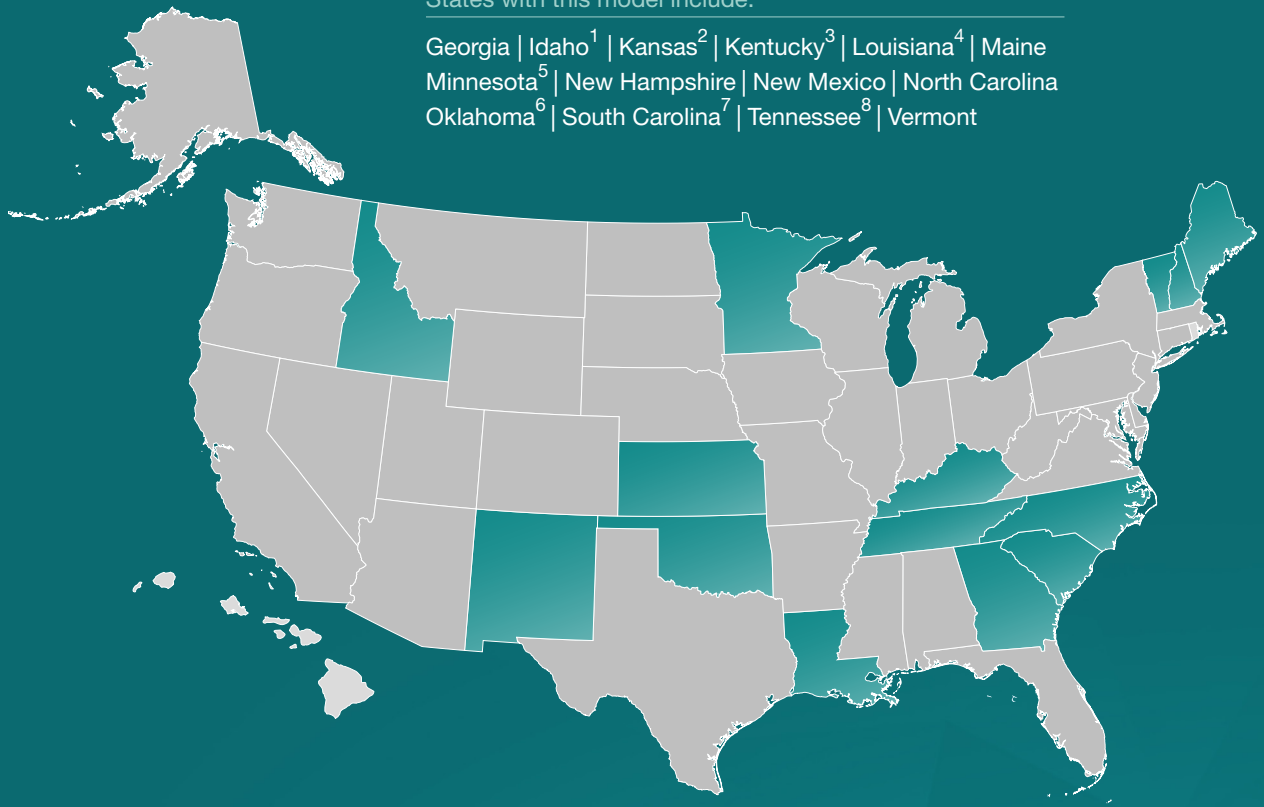
STUDENT PAYS NO TUITION

STATE PAYS

Under this funding approach, the state, usually through an appropriation, covers dual enrollment tuition regardless of student family income. Students enrolled in courses covered by the state program do not pay tuition; postsecondary institutions may not receive the same tuition amounts per course as they would receive for a regularly matriculated student. States that use this approach may cover all courses in which eligible secondary students enroll, or may limit the payment of tuition costs to a limited number or type of courses (i.e., career/technical), or to courses taken by students in limited grade levels.

States with this model include:

Georgia | Idaho[1] | Kansas[2] | Kentucky[3] | Louisiana[4] | Maine
Minnesota[5] | New Hampshire | New Mexico | North Carolina
Oklahoma[6] | South Carolina[7] | Tennessee[8] | Vermont



1 For tuition paid with Fast Forward funds
2 For tiered, funded CTE courses
3 For courses taken through the Dual Credit Scholarship Program or the Work Ready Kentucky Scholarship Program for high school students
4 For courses taken using TOPS-Tech Early Start Award
5 For Postsecondary Enrollment Options
6 For seniors (and to the extent funding is available, juniors) who qualify for a concurrent enrollment tuition waiver
7 For SC•WINS scholarship recipients
8 For students eligible for a dual enrollment grant

Reflects policy in place as of Spring 2019.

EQUITY RATIONALE FOR THE MODEL

- Equal financial access to dual enrollment courses regardless of family income

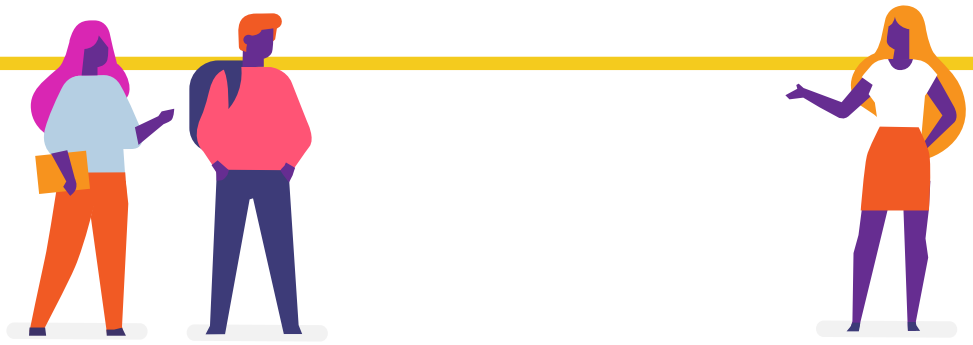
POTENTIAL BENEFITS AND CHALLENGES

BENEFITS:

- Students don't pay
- Ideally this approach equally incentivizes participation for all students and all school districts regardless of student demographics, high school location, etc.
- Treating all eligible students in the same way simplifies enrollment tracking for reimbursement or payment of tuition for participating students (as opposed to tracking a subgroup of students based on underrepresented status). This approach can also simplify data sharing between state and education entities.
- Not requiring demonstration of need reduces student stigma and decreases the amount and type of paperwork required from students and parents for participation. Both issues factor into student engagement in these programs.

CHALLENGES:

- State reimbursement to institutions is often at rates lower than the tuition revenue a regularly matriculated student would generate. This can disincentivize a higher education institution's participation.
- In isolation from other supporting policy to ensure program access and engagement, this approach can exacerbate equity gaps by increasing the ease with which affluent students from college-educated families can take advantage of dual enrollment programs.
- Policymakers and program staff may face challenging conversations centering on why an affluent student and low socioeconomic student receive the same benefit/opportunity.
- Sustaining policymaker buy-in may pose a challenge, particularly as costs increase with increased student participation, and new policymakers enter office.



QUESTIONS STATES NEED TO ASK THEMSELVES

Policy issues beyond the funding model can stimulate better equity outcomes. States need to assess their policies in the following key areas to ensure equitable access and engagement.

Questions	To ensure equitable access…
Mandates on course offerings	
Are all public high schools or districts required to enter into dual enrollment agreements?	States should consider requiring all public high schools to enter into dual enrollment agreements, so that administrator commitment to dual enrollment is not a barrier to program access.
Are all public postsecondary institutions required to enter into dual enrollment agreements?	States should consider requiring all public postsecondary institutions to enter into dual enrollment agreements. If dual enrollment program participation is determined by each institution's leadership, the state may not realize its goal of ensuring equitable access.
Course/student limitations	
How many courses will the state cover?	While permitting high school students to enroll full-time in postsecondary coursework will allow the most motivated students to earn an associate degree before high school graduation, the volume of credit hours that the state must pay for under such policies may not prove sustainable in the long term, thus compromising future program access.
What types of courses will the state cover?	States may consider limiting state-funded courses to both • A set of courses recognized for transfer among all public two- and four-year institutions in the state. • Broadly applicable general education courses, and CTE courses applicable to in-demand credentials and degrees.
What student grade levels can access state-funded courses?	States should weigh the potential benefits and disadvantages to limiting the student grade levels that can access state-funded courses.
Are only public school students funded, or may private school and/or home school students participate under the state-funded rate?	States should consider whether they will allow all students who meet program eligibility requirements - regardless of school type – to access state-funded dual enrollment courses.
Funding amounts and processes	
What tuition or reimbursement amount will the state pay for each enrolled student?	Several approaches to dual enrollment tuition-setting can balance the state's ability to sustain long-term program support with the district and institution's desire to cover costs: • A uniform reduced tuition rate (e.g., Idaho, Kentucky) • An allocation automatically generated in a state-established formula (e.g., Iowa) • A flat amount from a legislative appropriation to be allocated to participating institutions (e.g., Georgia) Alternatively, states may pay full tuition but limit course access to students in grades 11 and 12 and limit eligible courses to broadly applicable, transferable community college courses (e.g., North Carolina).
What mechanism will transfer tuition payments from the state to the institution or district in a timely manner? Which state agency is best situated to process payments?	States must determine the answer to this question based on local context. Maximizing efficiency augments the state dollars available to support program access and participation.
Who pays non-tuition participation costs – fees, textbooks, course materials, etc.?	Non-tuition participation costs can also pose an enrollment barrier to students. States may consider what approach, if any, they will use to address textbooks, transportation, course materials, and other fees. Examples include districts and postsecondary institutions splitting non-tuition costs, the postsecondary institution providing textbooks and a state appropriation reimbursing the institution, or utilizing Open Education Resources (OER).
Data collection and reporting	

What data on program benefits to students, and K-12 and postsecondary partners, should the state collect and publicly report to indicate return on investment and support sustained financial commitment to the model?	States should annually collect and publish participation and outcomes data, including but not limited to:
	• Cost savings to families and the state for postsecondary courses completed via dual enrollment
	• Credit hours completed in broadly transferable and/or broadly applicable general education courses, and CTE courses required for in-demand credentials.
	• The relationship between dual enrollment participation and
	  o Higher postsecondary matriculation rates
	  o Lower remedial placement rates
	  o Higher levels of postsecondary success, including persistence and completion
	  o Reduced time to degree

BEST PRACTICES AND LESSONS LEARNED

Expect significant participation gains – and associated increases in state expenditures

As more students and parents become aware of the availability of tuition-free dual enrollment, participation rates are likely to increase substantially, which in turn will require a more considerable state financial commitment. For example, when **New Hampshire** passed 2017 legislation establishing a state-funded dual enrollment model, the state witnessed a one-year 31% jump from 2017-18 to 2018-19 in dual/concurrent credit completion rates (Beth Doiron, personal communication, May 13, 2019). After 2015 passage of **Georgia** legislation creating a dual enrollment program covering student tuition, textbooks and fees, the number of dually enrolled students and credit hours attempted in the state grew 212% and 258%, respectively, from FY 2013 to FY 2017 (Griffin & McGuire, 2018).

Simplicity and transparency are key in implementation systems

When states witness sizable increases in dual enrollment participation rates – and by extension, the dollars required to support those students' tuition costs – simplicity and transparency in how those funds make their way to the entity requiring tuition reimbursement become all the more critical.

Policy options to support simplicity and transparency include:

- **Common statewide tuition (or reimbursement) rate: Idaho** dual credit courses taught at the high school by a high school instructor (the most common delivery model in the state) are a uniform $75 per credit hour across all public institutions. **Georgia** public and private institutions receive an amount from an annual appropriation, that the institution must consider full payment for a student's tuition, fees, and books (Ga. Code Ann., § 20-2-161.3 (j)(3)) (In FY 20, the state appropriation will not cover books and fees—however, by statute students may not be charged for these expenses.) (Noggle, May 3, 2019). **New Hampshire** community colleges receive up to $250 per approved completed dual enrollment course; the institution accepts such amount as full payment for course tuition (N.H. Rev. Stat. § 188-E:27(III)).

- **Centralizing and streamlining payment processes:** Approaches that streamline payment processes for families, and for counseling and administrative staff at secondary schools, districts and postsecondary institutions address equity by making sure payment does not hinge upon student and parent understanding of bureaucratic procedures, or strain already-overstretched district or school-level human resources.

  Georgia payments are disbursed to postsecondary institutions by the Georgia Student Finance Commission (Ga. Code Ann., § 20-2-161.3). The Idaho State Department of Education pays dual credit tuition funds to postsecondary institutions at the end of each semester based on the number of dual credits the Fast Forward portal indicates were completed at each institution (Matt McCarter, personal communication, May 7, 2019).

Establishing clear initial program parameters may mitigate sustainability challenges

In FY 18, **Idaho** committed roughly $16 million to the Fast Forward program, of which $13.4 million went to dual credit tuition for 25,085 students. Driven by significant program participation increases, Georgia's dual enrollment appropriation increased from $49 million in FY 16 to $105 million in FY 19. Gaining and maintaining legislative support for a significant and growing annual expenditure is vitally important to program sustainability.

Program popularity among students and parents is key to sustaining policymaker investment in a "state pays" dual enrollment funding model. Many states that have committed to covering dual enrollment tuition have continued their financial support despite growing enrollments—and growing state costs—because of backlash from students and parents if the program were cut back.

However, states can ultimately grow to a point where guardrails are necessary to ensure long-term program sustainability. For example, the 2019 Georgia General Assembly appropriated FY 20 funds at $25 million below the more than $125 million requested to cover projected student participation costs. As a result, the Georgia Student Finance Commission has announced that beginning in the fall 2019 term, book and fee awards will be $0 (Noggle, May 3, 2019). Therefore, states should discuss options to address increased engagement early in policy discussions.

States considering the "State Pays" model may consider setting parameters on eligible students and courses at the same time this funding model is adopted, to keep the state's expense at a sustainable level as enrollments grow without unduly restricting program access. Possible parameters are listed under "Course/student limitations" in the "Questions states need to ask themselves" table.

Idaho's Fast Forward program, the only approach of its kind in the nation, makes a total of $4,125 available to each public school student in grades 7-12. These funds, which are supported by state appropriation, may be applied towards any of several acceleration options: dual credit tuition, AP, IB or professional certification exam fees, CTE workforce training courses, or "overload" courses, taken in addition to a full credit load and outside of the regular school day, including during the summer.

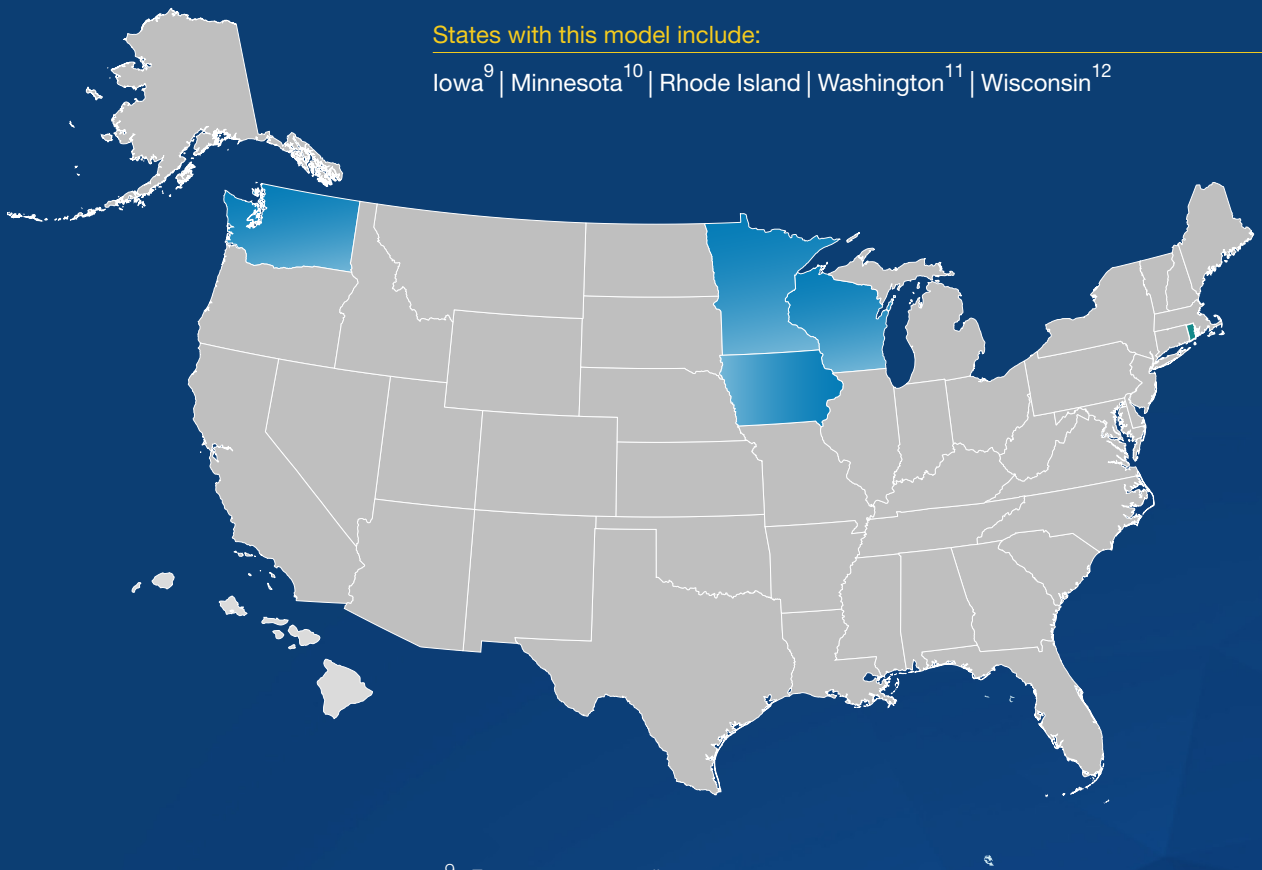
STUDENT PAYS NO TUITION

COMBINATION OF STATE AND DISTRICT PAY

Under this model, state policy either defines the respective portion of tuition that the state and district will pay or requires that districts make initial tuition payments to the postsecondary partner, but provides an appropriation or provides a supplemental weight in the school funding formula for dual enrollment participation.

States with this model include:

Iowa[9] | Minnesota[10] | Rhode Island | Washington[11] | Wisconsin[12]



9 For concurrent enrollment
10 For concurrent enrollment
11 For Running Start
12 For Early College Credit Program, if course is taken for high school credit (or high school and college credit) and deemed not comparable to courses offered in the school district or private school. Student pays 25% of tuition charged through the program if a course is taken for postsecondary credit only, and pays all tuition if a student is taking a course for high school credit and the course is deemed by the student's district board or postsecondary school governing body to be comparable to a course offered in the district or at the private school.

Reflects policy in place as of Spring 2019.

EQUITY RATIONALE FOR THE MODEL

- Equity of student access to dual enrollment courses, regardless of family income, with less strain on state coffers

POTENTIAL BENEFITS AND CHALLENGES

BENEFITS:

- Students don't pay
- Ideally, this approach equally incentivizes participation for all students and all school districts, regardless of student demographics, high school location, etc.

CHALLENGES:

- District and/or institution may not receive same funding level as they would receive for traditional high school or postsecondary student
- Sustaining both state and local leader buy-in may pose a challenge, particularly as costs increase with increased student participation and policymaker turnover occurs.

QUESTIONS STATES NEED TO ASK THEMSELVES

Questions previously posed for the "State Pays" model that are relevant regardless of funding mechanism include:

- Mandates on course offerings,
- Course/student limitations,
- Funding transfer mechanisms,
- The entity responsible for non-tuition participation costs, and
- Data collection and reporting.

In addition to these questions applicable across funding models, states considering the "Combination of state and district pay" mechanism should also assess their policies in the following key areas below to ensure equitable access and engagement.

Questions	To ensure equitable access…
Funding amounts and processes	
What tuition amount will the state and district respectively cover?	The funds that the district receives from the state should be adequately substantial so that districts – particularly low-resource or those with declining enrollments – are not unduly limited in the number or type of dual enrollment courses they can offer or deterred from offering dual enrollment altogether.
Should tuition be paid by the district and partially reimbursed by the state, either at a flat rate or an appropriation?	A state's approach will vary based what is palatable to state policymakers, state and local K-12, and postsecondary stakeholders. However, if the state chooses a flat rate, there should be an opportunity for adjustment if/when needed. An appropriation that does not increase with rising inflation and student participation rates will disincentivize districts from providing equitable access. Alternatively, the school funding formula could provide a supplemental weight for dually enrolled students.

BEST PRACTICES AND LESSONS LEARNED

Significant participation gains, including among diverse learners

Across the board, states that have adopted this funding approach have seen gains in student participation, including among underrepresented groups. In just one example, **Minnesota** legislation passed in 2007 provides that a district offering a postsecondary course taught by high school teacher (defined in Minnesota statute as concurrent enrollment) is eligible for up to $150 per student enrolled in a concurrent enrollment course (M.S.A. § 124D.091). From FY 2011 to FY 2017, concurrent enrollment participation increased 58% among all public school students but rose 81% and 184% among low-income students and students of color, respectively (Minnesota Department of Education, 2018).

Need to communicate with policymakers to sustain state appropriation

In states in which districts make initial tuition payments to the postsecondary partner and receive a subsequent legislative appropriation to defray program expenditures, states need to clearly and persuasively communicate program value to legislators, including data on program growth, the benefits of student participation – particularly for students underrepresented in higher education in the state – and the state's return on investment in the program. This communication is all the more vital as program enrollments – and district costs – rise, and districts need higher levels of state funding to keep pace.

Minnesota legislation passed in 2012 (H.F. 2949) added a requirement that an annual report on Advanced Placement and International Baccalaureate also include participation data and recommendations on concurrent enrollment and the state's original dual enrollment program, Postsecondary Enrollment Options (PSEO) in which students take courses at the postsecondary institution.

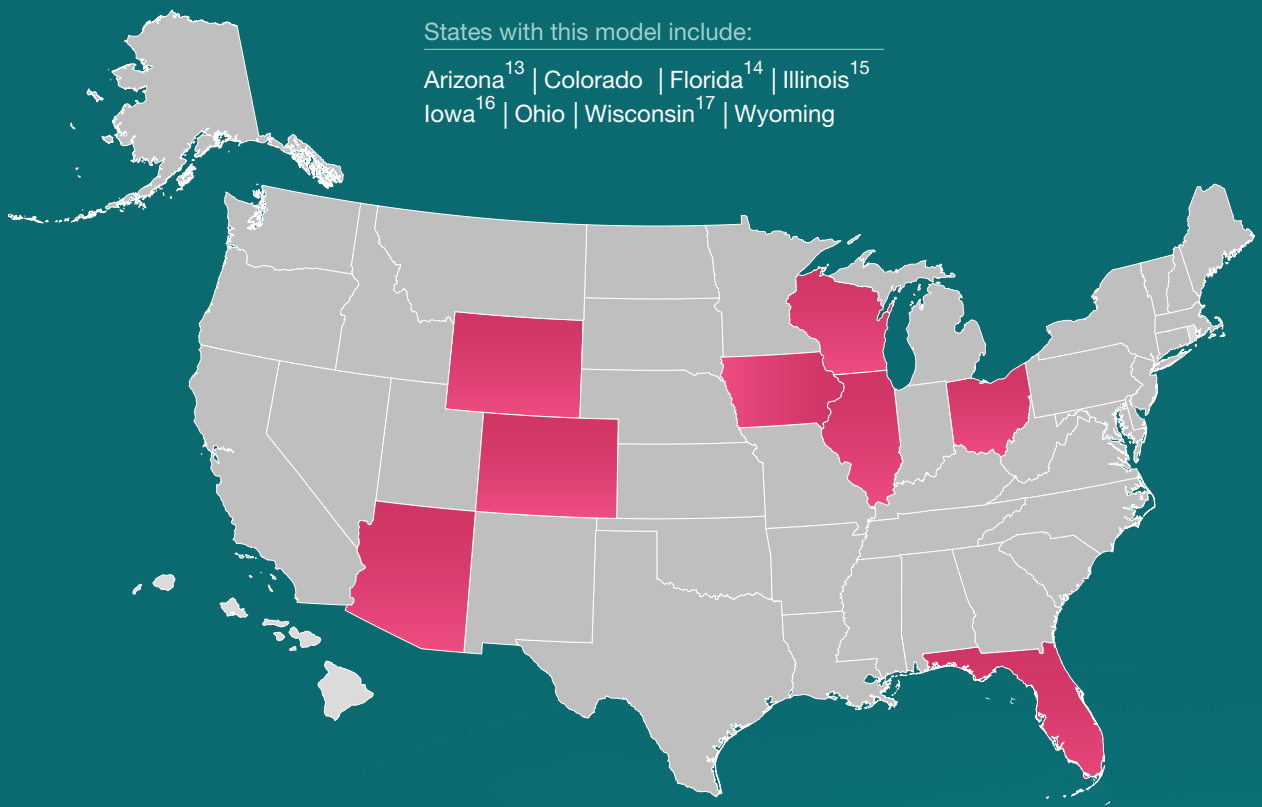
STUDENT PAYS NO TUITION

DISTRICT PAYS

Under this model, state policy requires district revenues (i.e., per-pupil funds, funds generated by average daily membership, etc.) to cover tuition expenses. Students may be charged fees but are generally not charged tuition.

States with this model include:

Arizona[13] | Colorado | Florida[14] | Illinois[15]
Iowa[16] | Ohio | Wisconsin[17] | Wyoming



13 For courses offered at the postsecondary institution, provided certain course and student conditions are met
14 For dual enrollment courses offered under F.S.A. § 1007.271
15 For courses offered through an advanced vocational training program, per 105 ILCS 5/10-22.20a
16 For Postsecondary Enrollment Options
17 For eligible courses taken at technical colleges through W.S.A. 38.12(14) (a.k.a. Start College Now program)

Reflects policy in place as of Spring 2019.

EQUITY RATIONALE FOR THE MODEL

- Funds district would already pay for educating student now applied to dual enrollment tuition
- K-12 funding less susceptible to fluctuations than public higher education funding
- May be perceived by some policymakers as politically "easier" than other funding models

POTENTIAL BENEFITS AND CHALLENGES

BENEFITS:

- Students don't pay

CHALLENGES:

- Adding programing that draws from already strained district resources can be unpopular.
- This approach can disproportionately stress under-resourced districts.
- Placing tuition burden entirely on districts may:
  - o Generate ill-will towards the program among some local decisionmakers
  - o Force local leaders to make tough decisions to meet program demand among students and parents

QUESTIONS STATES NEED TO ASK THEMSELVES

Questions previously posed for the "State Pays" model that are relevant regardless of funding mechanism include:

- Mandates on course offerings,
- Course/student limitations,
- Funding transfer mechanisms,
- The entity responsible for non-tuition participation costs, and
- Data collection and reporting.

In addition to these questions applicable across funding models, states considering the "District pays" mechanism should also assess their policies in the following key areas below to ensure equitable access and engagement.

Questions	To ensure equitable access…
Funding amounts and processes	
What tuition amount will the district pay for each enrolled student?	Several approaches to levels of tuition paid can cover costs while balancing the district's ability to maintain long-term program support with the needs of the district and postsecondary partner: • A flat rate that all districts are charged for eligible courses • A locally determined rate, with parameters on the minimum or maximum tuition that districts can be charged • Differing tuition levels depending on where and by whom a course is taught • Differing tuition levels depending upon institution type (two-or four-year, public or private.) However, this may add a layer of complexity that creates a barrier to equitable access.
Local agreements between K-12 and postsecondary partners	
To what extent should the state specify the content and parameters of local agreements?	To minimize substantial variations in program access or quality from one district to another, states may consider specifying the access and quality elements that must be addressed in local agreements between K-12 and postsecondary partners. Florida F.S.A. § 1007.271(21) has one of the most comprehensive lists.
Should the state require K-12 and postsecondary partners to annually submit their dual enrollment partnerships to a state agency for review?	Yes, provided that state policy requires local agreements to specify program elements (for example, the tuition amount being paid or reimbursed per student per course) that may vary from district to district and that may create inconsistencies in equity.

BEST PRACTICES AND LESSONS LEARNED

Parameters for permissible tuition amounts

Setting a flat rate or a minimum and maximum that districts can be charged for dual enrollment tuition can avert situations where an institution might otherwise seek to win a competitive advantage over other institutions by offering tuition below what other institutions are offering.

Setting parameters for tuition rates can also avoid disputes between K-12 and postsecondary partners if the course is offered at the high school, either by a postsecondary faculty member or an approved high school instructor.

- **Florida** statute establishes that for students dually enrolled in public institutions, districts pay the institution the standard tuition rate for courses taken on the postsecondary campus (during the regular school year), the costs associated with the proportion of the faculty member's salary and benefits to provide the course if the faculty member travels to the high school, and no payment if the course is delivered at the high school by an approved school district faculty member (F.S.A. § 1007.271(21)(n)(1))
- Under the Concurrent Enrollment Act, **Colorado** statute provides that dual enrollment tuition rates must be negotiated between the K-12 and postsecondary partners. Tuition charged by a public two-year college may not exceed the student share of Colorado resident tuition rate for the course. Tuition charged by any other postsecondary institution may not exceed the student share of the Colorado resident tuition rate for a community college general studies course. Both tuition rates are set by the state board for community colleges and occupational education. (C.R.S.A. §§ 22-35-104(6)(b)(III), 22-35-105(3)(a)(I),(II))

STUDENT PAYS REDUCED TUITION

COSTS SPLIT BETWEEN STATE AND STUDENT OR DISTRICT AND STUDENT

Under this model, state policy directs the state or district to cover some but not all tuition expenses. Students are expected to pay the portion of tuition not handled by the state or district. This model does not include programs under which the state or district covers dual enrollment tuition only for low-income students.

States with the State/Student split model include:

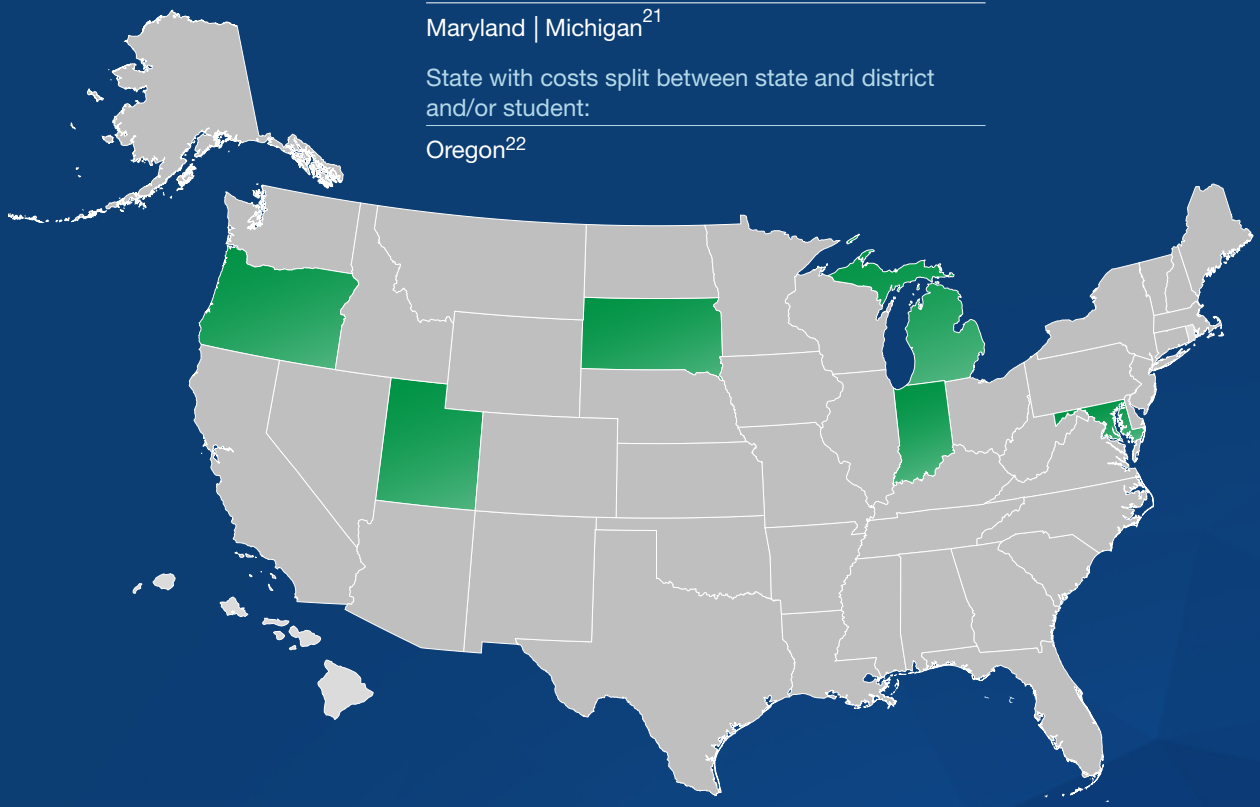
Indiana[18] | Michigan[19] | South Dakota[20] | Utah

States with the District/Student split model include:

Maryland | Michigan[21]

State with costs split between state and district and/or student:

Oregon[22]



18 For priority liberal arts and approved CTE courses, for students not eligible for free or reduced-price lunch

19 For students taking courses through Postsecondary Enrollment Options, the Career and Technical Preparation Act or concurrent enrollment, and whose districts receive an allocation under M.C.L.A. 388.1664b

20 For courses taken under the state subsidized high school dual credit program for 11th and 12th graders. A district is authorized to pay any portion under the student's share.

21 For students taking coursework under Postsecondary Enrollment Options or under the Career and Technical Preparation Act, whose districts do not receive an allocation under M.C.L.A. 388.1664b

22 For Dual Credit courses

Reflects policy in place as of Spring 2019.

RATIONALE FOR THE MODEL

- Decreases the barrier of tuition cost for students and parents

POTENTIAL BENEFITS AND CHALLENGES

BENEFITS:

- May increase program reach, by reducing the fiscal impact that the state, districts, postsecondary partners or students might otherwise bear in isolation
- Students may take course selections, coursework more seriously if they're bearing some financial responsibility
- May reduce potential disparities in program offerings in low-resource districts or districts with high percentages of low-income students unable to cover their own tuition

CHALLENGES:

- Without parameters on the amount students are charged (including waivers for low-income students), access and participation may be compromised
- Program sustainability may be compromised without:
  - o Parameters on eligible courses
  - o Ongoing communication to policymakers on program rationale, return on investment

QUESTIONS STATES NEED TO ASK THEMSELVES

Questions previously posed for the "State Pays" model that are relevant regardless of funding mechanism include:

- Mandates on course offerings,
- Course/student limitations,
- Funding transfer mechanisms,
- The entity responsible for non-tuition participation costs, and
- Data collection and reporting.

In addition to these questions applicable across funding models, states considering this funding approach should also assess their policies in the following key areas below to ensure equitable access and engagement.

Questions	To ensure equitable access…
Funding amounts and processes	
Does the student and/or district or state pay the same cost regardless of • **Instructor type?** • **Institution type (two- or four-year? Public or private)?** • **Course location or modality?** • **The number of courses a student has completed?**	To minimize confusion or misinformation, non-low-income students should be charged the same tuition regardless of instructor or institution type, course location or modality, or the number of dual enrollment courses a student has completed.
Local agreements between K-12 and postsecondary partners	
How can policy create an equitable balance of district- or state- and student-borne costs?	The combined district or state and student-borne portions of tuition should be equal to or less than the tuition generated by a regularly matriculated student in the same course. The student-borne portion of tuition for non-low-income students should be minimal/reasonable. Placing too great a tuition burden on districts can force them to make difficult financial tradeoffs in order to meet student and parent demand for coursework.
What, if anything, do low-income students pay?	Low-income students should not be charged tuition. Processes should be instituted such that districts notify the state or postsecondary institution when a low-income student enrolls in a dual enrollment course, so that their portion of tuition may be waived or paid by an entity other than the student.

Indiana best practices ensure the quality and applicability of courses and incentivize K-12/postsecondary partnerships to offer these courses.

BEST PRACTICES AND LESSONS LEARNED

Indiana authorizes the Commission for Higher Education (CHE) to identify a set of concurrent enrollment courses (taught by an approved high school instructor at the high school) to receive state funding (IC 21-43-1.5-1) and set a rate to be charged a student for such courses (IC 21-43-1.5-2).

Minimizing student cost as participation barrier

Per the CHE policy resulting from the aforementioned directive, students pay $25 per credit hour for priority liberal arts courses and select postsecondary credit-bearing CTE courses. Institutions are authorized, upon demonstration of financial need, to grant a student financial assistance, including a tuition waiver (IC 21-43-4-12), and must waive dual credit tuition for a student eligible for free or reduced-price lunch (IC 21-14-8-1).

For priority dual credit or CTE courses taken at Ivy Tech Community College campuses (Indiana's largest public postsecondary institution, with over 40 locations statewide), students are also not charged tuition; rather, the district pays the student's tuition (IC 21-43-4-19.5).

Using funding to incentivize offering of & enrollment in broadly applicable, transferable courses

- **Incentivize students to select broadly applicable courses – and for liberal arts, broadly transferable courses.** The list of priority liberal arts courses students may access at the $25 per credit hour tuition rate (or at no cost for low-income students) is approved annually by the CHE and Statewide Transfer and Articulation Committee. All priority liberal arts courses are in the Indiana Core Transfer Library, a set of courses that transfer among all Indiana public two- and four-year institutions, as well as six independent institutions. The CTE courses offered at the $25 per credit hour rate apply to the Indiana Department of Education-approved career pathways.

- **Incentivize public institutions to offer broadly applicable, broadly transferable courses.** Public two- and four-year institutions recover a portion of lost tuition revenue for priority dual credit courses and dual credit CTE courses through a legislative appropriation. Every biennium, public institutions submit to the legislature a head count of enrollment in priority courses and CTE dual credit courses per semester, and the legislature provides an appropriation to defray the cost of lost tuition revenue. Through 2017, the appropriation was at a $50 per credit hour rate. Due to the confluence of growing program participation and budget constraints, in 2019 the reimbursement was approximately $41 per credit hour for the biennium.

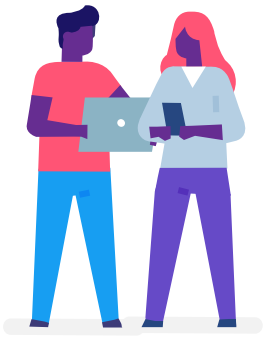
  The actual amount of tuition to be charged for priority dual credit and CTE dual credit courses (up to $25/credit hour) is to be determined in the local agreement between the K-12 and postsecondary partners. In practice, many institutions waive tuition for priority dual credit and CTE dual credit courses. (Tari Lambert, personal communication, April 30, 2019).

  - **Facilitate student counseling/advising.** Creating a single statewide list of courses offered at reduced or no tuition that either apply toward a career pathway or general education requirements helps guidance counselors advise students into courses most likely to be applicable to the credential or degree they aspire to earn.

  - **Ensure course quality.** Per Indiana statute, all institutions offering concurrent enrollment courses (in which an approved high school teacher delivers the course at the high school) – including but not limited to those offered for the $25/hour tuition rate – must either be accredited by the National Alliance of Concurrent Enrollment Partnerships or approved by the CHE (IC 21-43-4-19.2). Ensuring through these mechanisms that courses delivered by high school instructors hold students to college-level expectations may assuage concerns about the broad transferability of priority dual credit courses, or the significant state investment the Indiana model represents.

PROGRAM QUALITY MATTERS

Since 2004, NACEP has served as the nation's sole accrediting body for concurrent enrollment partnership programs, providing an essential component of external review for quality assurance and quality improvement of these unique educational programs. Accreditation is awarded to programs after a comprehensive peer review by a team of experienced representatives of NACEP-accredited concurrent enrollment partnerships. Applicants conduct a self-study and prepare an accreditation application with evidence documenting how the college or university implements NACEP's 16 national standards for program quality in the areas of: curriculum, faculty, students, assessment, partnerships, and program evaluation.



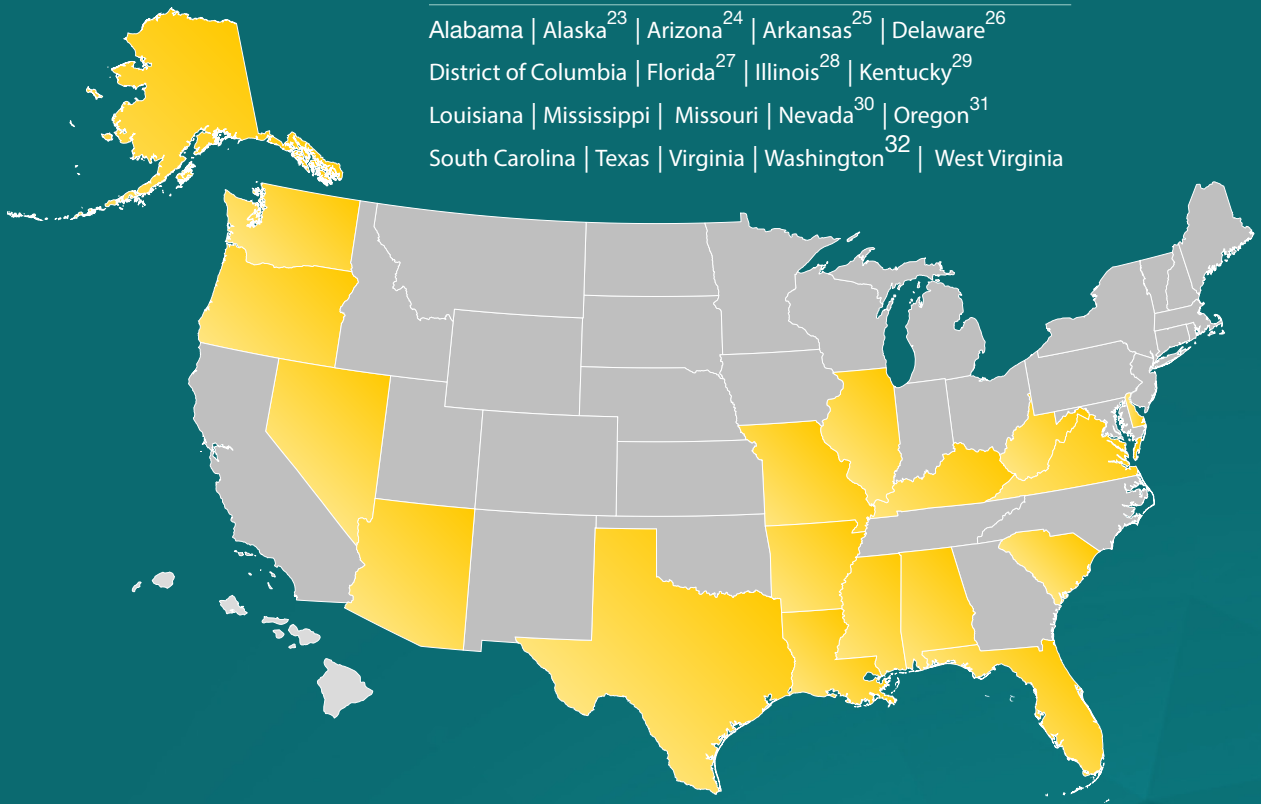
STUDENT PAYS ANYWHERE FROM NO TO FULL TUITION

LOCAL DECISION

Under this model, state policy does not designate the entity responsible for covering tuition costs, but explicitly states that the amount of tuition, and the party/parties responsible for paying tuition, must be locally determined by the K-12 and postsecondary partners. This model does not include states in which policy is silent on who is responsible for paying tuition.

States with this model include:

Alabama | Alaska[23] | Arizona[24] | Arkansas[25] | Delaware[26]
District of Columbia | Florida[27] | Illinois[28] | Kentucky[29]
Louisiana | Mississippi | Missouri | Nevada[30] | Oregon[31]
South Carolina | Texas | Virginia | Washington[32] | West Virginia



23 For courses offered at K-12 institution

24 For community college courses offered at the high school during the school day

25 For concurrent enrollment and endorsed concurrent enrollment. Subsidized tuition for low-income students, up to 6 credit hours.

26 However, subsidized tuition for low-income students

27 For Collegiate High School programs.

28 For agreements between a district and community college district

29 For courses not covered by the Dual Credit Scholarship Program or Work Ready Kentucky Scholarship Program for high school students

30 However, in the 2015, 2017 and 2019 biennia, the legislature appropriated funds for competitive grants to districts, some of which may be used to defray dual enrollment tuition and other expenses for underserved students.

31 For Expanded Options courses

32 For College in the High School. However, state subsidies for certain 11th and 12th grade students enrolled in eligible CHS classes are available.

Reflects policy in place as of Spring 2019.

RATIONALE FOR THE MODEL

- Easier to gain policymaker support than other models
- Appealing in local-control states

POTENTIAL BENEFITS AND CHALLENGES

BENEFITS:

- Districts/institutions must reach mutually agreeable arrangement
- Students might pay little to nothing

CHALLENGES:

- Some postsecondary institutions may charge districts or students full tuition (or close to it), resulting in significant disparities in student access and affordability statewide

QUESTIONS STATES NEED TO ASK THEMSELVES

Questions previously posed for the "State Pays" model that are relevant regardless of funding mechanism include:

- Mandates on course offerings,
- Course/student limitations,
- Funding transfer mechanisms,
- The entity responsible for non-tuition participation costs, and
- Data collection and reporting.

In addition to these questions applicable across funding models, states considering this funding approach should also assess their policies in the following key areas below to ensure equitable access and engagement.

Questions	To ensure equitable access…
Funding amounts and processes	
Should state policy set parameters on how much tuition may be charged any student statewide, or low-income students specifically?	Yes. In addition, state policy can identify external (federal, state, or private) funding sources districts may use to help cover tuition expenses.
Data collection and reporting	
With the potential that the Local Decision model creates for inequitable access, what is the role of state-level dual enrollment data collection and reporting systems?	State data reports must be externally-facing and designed to easily identify inequities in access and participation rates. If necessary, data systems must be created or enhanced, or made public-facing in order to collect and report reliable dual enrollment data, in order to identify local disparities.
Data collection and reporting	
Does the benefit of local flexibility outweigh the potential downside of uneven program access across the state?	States should consider a dual enrollment funding model other than the "Local Decision" model to mitigate or eliminate the risk of inequitable program access that this funding model poses.

BEST PRACTICES AND LESSONS LEARNED

Tuition Parameters

If the local decision is to charge students tuition (either discounted tuition or the same tuition as regularly matriculated students), should the state prohibit low-income students from being charged? Should the state provide tuition support for low-income students, and if so, how?

Policy options to ensure students in financial need have dual enrollment course access include:

- **Requirement that local agreements cover low-income students' costs: Arkansas'** low-income students cannot be charged participation costs for up to six credit hours of endorsed concurrent enrollment coursework taught by a high school teacher at the high school. Low-income students' costs must be covered by the student's school district, the postsecondary partner, or through a cost-sharing agreement between the district and postsecondary institution (A.C.A. § 6-16-1204(e)(3))
- **Earmarked state funds: Delaware** prohibits a student from being denied access to dual enrollment courses because of the student's or family's inability to pay (14 Del. Admin. Code 506.3.1.5). However, a portion of the legislature's annual $1.5 million in college access funding since 2014 has been earmarked for dual enrollment expenses for low-income students. Funds are retroactively awarded to districts based on numbers of dually-enrolled low-income students reported to the department of education.
- **State-funded scholarship program: Nebraska** policy is silent on the entity responsible for covering dual enrollment tuition. However, the Access College Early Scholarship Program offers awards covering tuition and fees to applicant students whose parent/guardian meets financial eligibility criteria or has experienced an extreme hardship (Neb. Rev. St. §§ 85-2104, 85-2105). In 2017-18, $914,907 in state funds supported 3,723 scholarships supporting 12,512 credit hours taken (Nebraska Coordinating Commission for Postsecondary Education, 2019).

Identifying external funding sources

Although **Nevada** specifies that local agreements between K-12 and postsecondary partners must determine tuition responsibility, statute specifies that all or a portion of the tuition may be paid either by any of several sources, including the K-12 partner; the student; available department of education grants to support dual credit access; or "any other funding source, including federal funding sources or sources from private entities" (N.R.S. 389.310(2)(c)) Communicating to local partners that dual enrollment tuition responsibility does not necessarily lie with a single entity, and that alternatives to the district or student are possible, can jog creative thinking on this issue.

Using data to identify local disparities in offerings and access

While disparities in program offerings and access are likely to exist across dual enrollment funding models, they may be particularly exacerbated when the amount of tuition to be paid is entirely at the discretion of the K-12 and postsecondary partner. **Kentucky's** Dual Credit Policy (2016) calls for the creation of a Dual Credit Advisory Council whose charges include working with the Kentucky Department of Education (KDE) and the Council on Postsecondary Education (CPE) "to create data systems that allow monitoring and tracking of dual credit students" as well as an accountability system with metrics on access and affordability. The policy also directs CPE and KDE to ensure they each provide data to support the monitoring and tracking of dual credit students.

As a result, the Kentucky Council on Postsecondary Education's dual credit dashboard provides data on program availability and credit hours attempted, by institution, district, and high school to allow for cross-state comparisons on course access and participation rates.

CONCLUSION

Designing a state dual enrollment funding model that places equity at its core and removes tuition burdens for low income students is complex, but states have options for how to design models that suit their specific governance or political circumstances while still meeting important objectives. Each state's circumstances are likely to be slightly different, and so different questions and challenges will likely be at play.

Where possible, states should be using this resource to look beyond the foundations of the existing finance system to identify new questions worth answering or challenges worth addressing. Many states have already developed dual enrollment funding systems, but every state has more to do to ensure equitable access and success for low income and underrepresented students in college in high school programs.

This paper is a key resource to assist policymakers in navigating the complex set of options available to create policy that serves students in need. By addressing equity though intentional use of state funding we can grow and sustain dual enrollment programs, and empower our nation with the educated workforce to meet the needs of the 21st century economy.

CHSA is ready, willing, and able to work with states interested in adopting some of the lessons of this resource and reforming their dual enrollment funding model. Don't hesitate to reach out through the CHSA website, www.collegeinhighschool.org to start the conversation.

REFERENCES

14 Del. Admin. Code 506

A.C.A. § 6-16-1204

ExcelinEd. (2018, October 18). College and Career Pathways: Equity and Access. Retrieved from **https://www.excelined.org/wp-content/uploads/2018/10/ExcelinEd.Report.CollegeCareerPathways.CRDCAnalysis.2018.pdf**

C.R.S.A. § 22-35-104

C.R.S.A. § 22-35-105

F.S.A. § 1007.271

Ga. Code Ann., § 20-2-161.3

Griffin, G.S. & McGuire, L. (January 2018). Dual Enrollment: Participation has significantly increased, though program lacks clear goals. (Report No. 17-09). Atlanta: Georgia Department of Audits and Accounts, Performance Audit Division.

IC 21-14-8-1

IC 21-43-1.5-1

IC 21-43-1.5-2

IC 21-43-4-12

IC 21-43-4-19.2

IC 21-43-4-19.5

Kentucky Commission for Higher Education (n.d.). Dual Credit Dashboard. Retrieved from **http://cpe.ky.gov/data/dualcredit.html**

Kentucky Commission for Higher Education and Kentucky Department of Education (2016). Kentucky Dual Credit Policy. Retrieved from **http://cpe.ky.gov/policies/academicaffairs/dualcreditpolicy.pdf**

Minnesota Department of Education. (2018, June 13). Rigorous Course Taking: Advanced Placement, International Baccalaureate, Concurrent Enrollment and Postsecondary Enrollment Options Programs. Retrieved from **https://education.mn.gov/MDE/about/rule/leg/rpt/2018Reports/**

M.S.A. § 124D.091

Nebraska Coordinating Commission for Postsecondary Education. (2019, January 24). Access College Early Scholarship 2017-18 Year-End Report. Retrieved from **https://ccpe.nebraska.gov/sites/ccpe.nebraska.gov/files/doc/ACE_2017-18.pdf.**

Neb. Rev. St. §§ 85-2104, 85-2105

N.R.S. 389.310

N.H. Rev. Stat. § 188-E:27

Noggle, C. (May 3, 2019). Dear Colleague letter: 2019-2020 State Scholarship, Grant and Loan Program Regulations Tuition Award Charts Invoicing and Extension Request Deadlines. (DCL ID: 2020-01). Atlanta: Georgia Student Finance Commission.

U.S. Department of Education. (2019). Data Point: Dual Enrollment: Participation and Characteristics (NCES 2019-176). Retrieved from **https://nces.ed.gov/pubs2019/2019176.pdf**

QUESTIONS OR COMMENTS?
Contact Jennifer Zinth at:
jennifer.zinth@gmail.com

COLLEGE IN HIGH SCHOOL
ALLIANCE

CollegeInHighSchool.org