



UNLOCKING POTENTIAL

A State Policy Roadmap for Equity and
Quality in College in High School Programs for
Students With Disabilities



03
Introduction

09
Equity Goal & Public Reporting

12
Program Integrity & Credit Transfers

15
Finance

17
Course Access & Availability

20
Instructor Capacity

23
Navigational Supports

26
Appendix

INTRODUCTION

State leaders are increasingly working to expand access to and improve equity in college in high school programs that provide secondary students with the opportunity to earn college credit. These courses provide students with valuable opportunities to personalize their K–12 learning journey and have been shown to improve postsecondary outcomes. However, students with disabilities¹ are too often excluded from these opportunities.

College in high school programs, such as dual enrollment, concurrent enrollment, and early college high school, are partnerships between school districts and accredited institutions of higher education that provide high school-age students an intentionally designed, authentic postsecondary experience leading to officially transcribed and transferable college credit towards a recognized postsecondary degree or credential. In this resource, we use the term

“college in high school programs” when referring to the programs generally, irrespective of the specific model prevalent in any given state, location of instruction, or type of instructor. Specific models are only named in the recommendation when that recommendation addresses that specific model (for example, a recommendation relevant only to early college high schools). In specific state examples, the appropriate term used in the state is referenced.

¹ Students with disabilities are defined here as students that are receiving special education services under the Individuals with Disabilities Education Act (IDEA).

A State Policy Roadmap for Equity and Quality in College in High School

In late 2019, the College in High School Alliance (CHSA) released [Unlocking Potential: A State Policy Roadmap for Equity and Quality in College in High School Programs](#).

This roadmap provides a six-part policy framework for promoting equitable access to high-quality college in high school programs, as well as examples from 28 states with noteworthy policies in these areas. As CHSA has supplemented this roadmap with additional resources, it identified a need to create an aligned resource targeted specifically towards improving participation and completion in these programs for students with disabilities. This resource, perhaps the first of its kind, details a range of specific policy goals with accompanying strategies designed to increase participation in college in high school programs for students with disabilities.

6 ► NAVIGATIONAL SUPPORTS

States prioritize the unique navigational supports and advising that students with disabilities need to ensure success in college in high school courses.

5 ► INSTRUCTOR CAPACITY

States develop strategies to support and allay concerns of instructors by encouraging collaboration between K–12 and postsecondary partners as college in high school programs are scaled, in particular connecting K–12 special education and higher education disability resource staff.

4 ► COURSE ACCESS & AVAILABILITY

States ensure that students with disabilities are able to access college in high school courses with the same pathways that maximize opportunities for all students to earn multiple college credits and facilitate the integration of college in high school programs into federally required transition plans.

1 ► EQUITY GOAL & PUBLIC REPORTING

States set an equitable, statewide public goal for increasing the participation and success of traditionally underserved student groups, including students with disabilities, in college in high school programs, with clear, disaggregated public reporting and accountability for progress toward the goal.

2 ► PROGRAM INTEGRITY & CREDIT TRANSFER

States support and promote the inclusion of students with disabilities in 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 explore funding mechanisms that can ameliorate the cost of additional supports and services students with disabilities need to participate and excel in college level work in high school.



Misconceptions regarding students with disabilities have been deeply entrenched in our culture and education system for decades.

One of the earliest and most pernicious myths is that all students who qualify for special education have intellectual disabilities or what used to be referred to as mental retardation. This has resulted in lower expectations over the years and assumptions that students who receive special education services may not be candidates for college in high school programs. However, it is estimated that 80–85 percent of students with disabilities are able to meet the same achievement standards as all students if given the necessary services, supports, and accommodations.

“ NO BELIEF IS MORE DAMAGING in education THAN THE MISPERCEPTION THAT CHILDREN WITH DISABILITIES cannot really succeed and SHOULDN'T BE CHALLENGED TO REACH THE SAME HIGH STANDARDS AS ALL CHILDREN.”

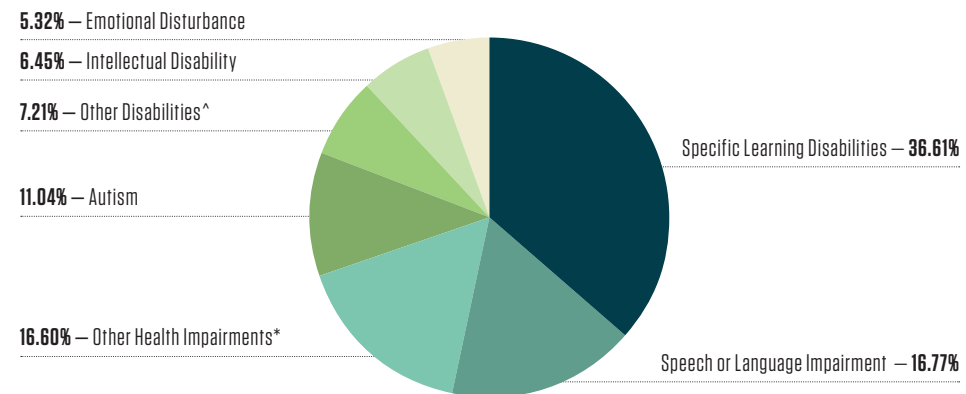
— Arne Duncan, former U.S. Secretary of Education

This is often startling for those new to special education and suggests that the majority of students with disabilities can be expected to experience success in college in high school coursework comparable to their peers without disabilities, so long as they are given the opportunity and support to do so.

Another common misconception is that the majority of students served in special education have low incidence disabilities such as autism or hearing and visual impairments, and that they require costly services and extensive accommodations and modifications. Yet the truth is that the majority of students with disabilities (53 percent) come from only two categories considered to be generally mild in

nature: specific learning disorders, such as dyslexia and speech-language impairments (see Figure 1). The vast majority of students with disabilities do not have an intellectual disability. This suggests that providing the services and support that the majority of students with disabilities need should be relatively low cost and should not serve as a barrier to enrolling these students in college in high school coursework.

FIGURE 1 Percentage of Students in Special Education Nationally, by Disability — 2018–2019



* Other health impairment means having limited strength, vitality, or alertness, including a heightened alertness to environmental stimuli, that results in limited alertness with respect to the educational environment, that is due to chronic or acute health problems such as asthma, attention deficit disorder or attention deficit hyperactivity disorder, diabetes, epilepsy, a heart condition, hemophilia, lead poisoning, leukemia, nephritis, rheumatic fever, sickle cell anemia, and Tourette Syndrome; and adversely affects a child's educational performance. ([Center for Parent Information and Resources](#)).

^ Other Disabilities category includes deaf-blindness, traumatic brain injury, multiple disabilities, developmental delay, visual, hearing, and orthopedic impairments. Each of these represent three percent or less.

Source: <https://www2.ed.gov/programs/osepidea/618-data/static-tables/index.html>

The Equity Gap — Access to College in High School Programs Is Inequitable

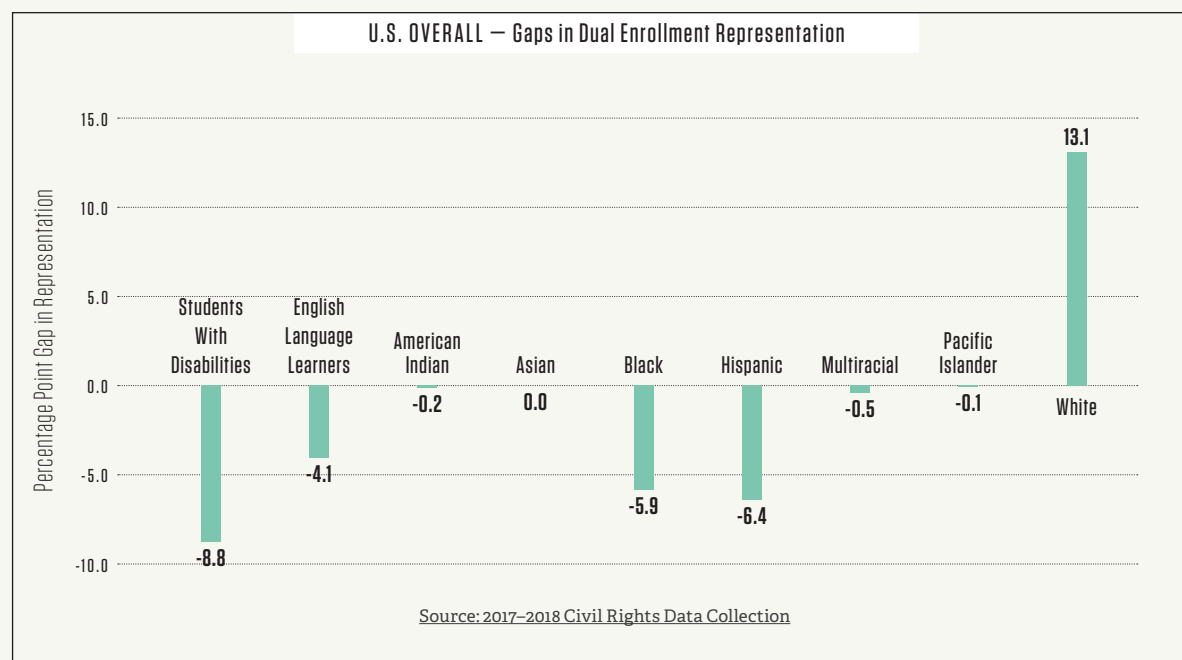
U.S. Department of Education data indicate that more than 90 percent of students who receive special education services attend regular schools, with the majority of these participating in general education classes.

Further, the majority (65 percent) graduate with a high school diploma. Yet despite the requirement that students with disabilities receive the support needed to prepare for postsecondary success, they only represent 3.9 percent of students enrolled in dual enrollment courses. According to the U.S. Department of Education's Civil Rights Data Collection (CRDC) for school year 2017–2018, students with disabilities make up 12.7 percent of the school population nationally, which represents an 8.8 percentage point gap in representation of students served under the Individuals with Disabilities Education Act (IDEA) among dual enrollment students. Unfortunately, yet unsurprisingly, as shown in Figure 2, students with disabilities have the largest representation gap in dual enrollment among other groups that have been historically disadvantaged. In fact, the gap is almost twice as large as the representation gap for English language learners.

Gaps exist in every state, ranging from (-14.7 percentage points) in Washington D.C. to (-5.1 percentage points) in Washington (see Appendix A). A [recent deep dive](#) into postsecondary success in five districts found that students with a disability were 60 percent to 95 percent less likely to participate in accelerated coursework such as a dual enrollment, Advanced Placement (AP) or International Baccalaureate (IB) course.

Participation rates for students with disabilities nationally are zero in too many schools that offer dual

FIGURE 2 Students With Disabilities Were the Most Underrepresented Student Group in Dual Enrollment in School Year 2017–2018



enrollment. Data from the Community College Research Center (CCRC) suggest that 37% of schools that enrolled students with disabilities offered dual enrollment coursework but didn't enroll any students with disabilities in these courses (see Figure 3, page 7). By state, this ranged from 15 percent of schools in Connecticut to 78 percent of schools in Arkansas (see Appendix A). Moreover, Figure 4 illustrates the inequity by subgroup (see page 7). English language learners and students with disabilities are shut-out of over one-third of schools whereas only 5% of schools did not have white students participating in dual enrollment.

*Gaps in key secondary education metrics have persisted for decades, but **THERE HAS BEEN PROGRESS IN BOOSTING HIGH SCHOOL GRADUATION RATES.** And while the gap in graduation rates between students with and without disabilities has shrunk, **THIS MILESTONE HAS NOT TRANSLATED TO SUCCESS FOLLOWING HIGH SCHOOL in either postsecondary education or employment for students with disabilities.***

Opportunities for students with disabilities to participate in college in high school programs are worth expanding because of their impacts; research has shown that **college completion leads to improved employment outcomes, and high-quality college in high school programs lead to increased access and success in postsecondary education**. There is no reason to believe that the same theory of action wouldn't also apply to students with disabilities. In fact, a recent survey completed by the Kessler Foundation found that “recent college graduates with disabilities were as likely to be employed as their peers without disabilities”.



Expectation gaps result in opportunity gaps, which in turn often result in achievement gaps. This reality carries significant equity implications for both college and career success for this student group. Students with disabilities face many unique barriers to participating in these programs, and states must begin explicitly designing policies to remedy this if they hope to address the pervasive equity gaps in participation in college in high school programs among this student demographic.

Using the Unlocking Potential framework, this paper offers detailed policy recommendations to expand access and success for students with disabilities in college in high school programs. This document is intended to be supplemental and work in tandem with the original recommendations of the roadmap.

FIGURE 3 Too Many Students With Disabilities Are Shut Out of Access to Dual Enrollment

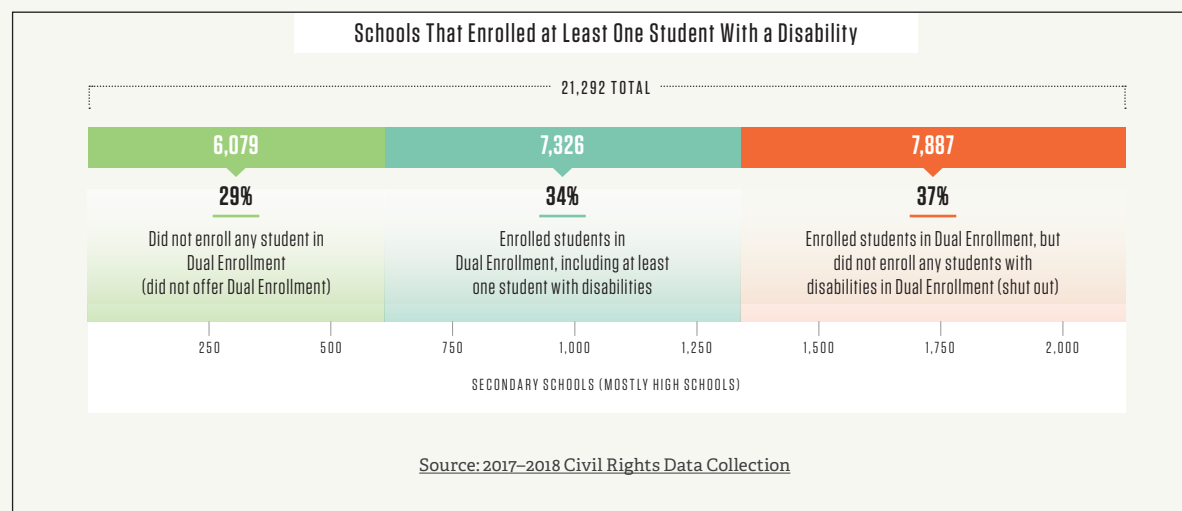
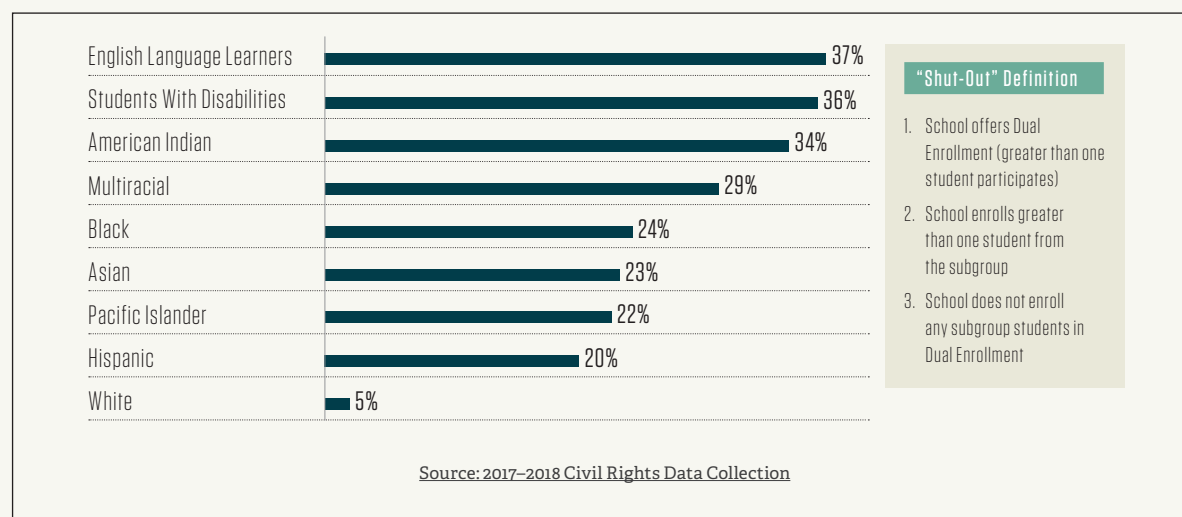


FIGURE 4 Percent of U.S. Schools Where Students Are Shut-Out of Dual Enrollment



1

Inclusive Vision

State policy makers should review all policies related to college in high school programs to ensure that students with disabilities are intentionally and explicitly included. This will send a clear message to schools, districts, and postsecondary institutions to encourage participation for these students.

2

Explicit Design

State and school leaders should design and implement college in high school programs and policies as a strategy to improve outcomes for students with disabilities. Compliance with disability laws is only the starting point, improving access and success in these programs is the goal.

3

Supportive Guidance

State leaders should develop and issue field guidance for both secondary and postsecondary stakeholders on the range of programs, services, and funding streams that can be used to support students with disabilities in dual enrollment.



EQUITY GOAL & PUBLIC REPORTING

States set an equitable, statewide public goal for increasing the participation and success of traditionally underserved student groups, including students with disabilities, in college in high school programs, with clear, disaggregated public reporting and accountability for progress toward the goal.



Why This Matters

Being intentional about closing equity gaps, accurately measuring them and being held publicly accountable to close the gaps is fundamental to unlocking the promise of college in high school programs. Discussions and definitions of equity often include students who have been historically disadvantaged or historically marginalized, yet students with disabilities are often excluded from these definitions.

- **Include students with disabilities in the state's definitions of equity in college in high school programs.**
 - ▶ The **Oregon** Higher Education Coordinating Commission adopted an Equity Lens to guide its work in 2014. This equity lens includes students with disabilities in its statement of beliefs regarding the student population that the community college and university system strives to serve.
 - ▶ The **Vermont** Agency of Education developed an Equity Lens Tool that includes students with disabilities in its definition of educational equity. The tool provides a common language and processes for policy and program evaluation as well as guide decision making.
- **Incorporate data sharing provisions into contracts or memorandums of agreement between secondary and postsecondary schools. Many states do not have full P-20 longitudinal databases and the data collection processes to identify students with disabilities differ in K-12 from higher education.**
 - ▶ **Illinois'** Model Partnership Agreement contains a provision in Exhibit D that discusses how the

parties can ensure the exchange of data in compliance with the Family Educational Rights and Privacy Act (FERPA).

- ▶ A **North Carolina** report to the General Assembly states that the Career and College Promise Evaluation Partnership Team established data sharing agreements and created a dataset that links relevant agencies and schools.
- **Comply with ESSA reporting requirements on advanced coursework access for student subgroups.**
 - ▶ Kentucky Report Cards disaggregate participation in dual credit programs into over a dozen student subgroups, including students with disabilities. These data also report the number of enrolled students, number of completers, and number of students with a qualifying grade.
- **Ensure students with disabilities are included in the goals and reporting of college in high school programs.**
 - ▶ **Georgia's** 2017–2018 Report, "Analysis of Dual Enrollment Outcomes," broke down dual enrollment participation and trends into a range of different student subgroups. In its breakdown, the report noted that "students with disabilities accounted for 11.6 percent of public high school students statewide, but only 1.7 percent of dual enrolled students."
 - ▶ **Ohio** statute requires the College Credit Plus Annual Report to include "the number of participants disaggregated by grade level, socioeconomic status, race, gender, and disability."



The report also shows enrollment by student subgroup, including students with disabilities, over a 5-year period.

► **Minnesota's Rigorous Course Taking Annual Report** includes students with disabilities (referred to in the report as "special education") in the reporting of Postsecondary Enrollment Options — Minnesota's term for dual enrollment and concurrent enrollment program participation.

- **Ensure students with disabilities are included in the goals and reporting of postsecondary and credential attainment goals.**
- **Ensure students with disabilities are included in the goals and reporting of college and career ready accountability metrics.**

► **Ohio's 2020 School Report Card** noted that "the students with disabilities subgroup had the highest percentage increase in the Prepared for

Success indicators with 19 percent more students meeting preparedness benchmarks overall." The Prepared for Success component of the report card measures how well prepared the state's students are for future opportunities through test scores, credential attainment, and participation in college-level courses.

► **Florida's State Report Card** includes participation data for dual enrollment under Accelerated Course Enrollment as part of the state's accountability framework that is disaggregated by disability status. Visitors to the site can create tables for dual enrollment participation going back to the 2016–2017 school year.

- **Ensure students with disabilities are included in the goals and reporting of career and technical education and Perkins Plan metrics broken out by career cluster and program of study.**



PROGRAM INTEGRITY & CREDIT TRANSFER

States support and promote the inclusion of students with disabilities in 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.



Why This Matters

Setting a goal to increase the participation of students with disabilities in college and high school programs amplifies the need for cooperation. For students with disabilities, care must be taken to ensure that the courses students take will count for both high school and college credit.

- **Develop and disseminate guidance for the process and proper documentation necessary to ensure coursework with related services and accommodations for students with disabilities will earn college credit**
- **Require memorandums of understanding (MOU) to clarify responsibilities for meeting the needs of students with disabilities.**
 - **Florida** [statute](#) requires an institution of higher education offering dual enrollment to include in its dual enrollment articulation agreement, the “services and resources available to students with disabilities.” The Department of Education is also tasked with providing this information to the Florida Center for Students with Unique Abilities, while the Center is tasked with providing information to students and parents.
 - [Guidance](#) from the **Wisconsin** Technical College System and the Wisconsin Department of Public Instruction specifies that “any contract for dual enrollment should have written local processes and procedures related to students with disabilities and ADA/504 accommodations. The high school special education staff, along with the technical college Disability Services Coordinators/ Staff, shall follow the processes and procedures to provide mutually agreed-upon services that address the accommodation needs of the student.”

- **Develop a model MOU that addresses supports for students with disabilities.**

- The **Illinois** legislature passed the [Dual Credit Quality Act](#) in 2019 which directed the State Board of Education and the Illinois Community College Board to appoint a committee to develop a Model Partnership Agreement. The subsequent [partnership agreement](#), published in 2019 by the Illinois State Board of Education, includes advising on the supports and services for individuals with disabilities to successfully transition into postsecondary education.

Respond, Innovate, Succeed, and Empower (RISE) Act Legislation



Disability and education advocates are eager to see the recently reintroduced RISE Act pass Congress as an amendment to the federal Higher Education Act. This bill would facilitate a smoother transition for students with disabilities to postsecondary opportunities by requiring colleges to accept a student's Individualized Education Program and/or 504 plan as evidence of a disability. This would remove a big obstacle for students because many institutions of higher education require a student to get reevaluated for a disability, which can be expensive and burdensome. Decisions regarding accommodations or modifications would still be determined on an individual level.

State policymakers should get ahead of their federal counterparts by enacting a similar approach.



- ▶ The **Montana** Office of the Commissioner for Higher Education provides a template MOU and stipulates that each agreement, at a minimum, should include: “specific information about whether the college, school district, or both the college and school district will make the necessary provisions to accommodate students with disabilities.”
- **Issue guidance for the development of contracts between secondary and postsecondary schools that include students with disabilities.**
 - ▶ **Pennsylvania's** Dual Credit Toolkit recommends that formal MOUs between secondary and postsecondary schools address issues related to students with disabilities and determine responsibilities. The document also recommends that partnerships ensure quality by, among other things, providing access to student support services for students with disabilities to assist them in achieving success and suggests alternatives if these services cannot be delivered in person on the campus.
- **Appoint a task force to coordinate ongoing efforts, preferably including students with disabilities.**
 - ▶ **North Carolina** established a Joint Advisory Committee, which is composed of representatives from the NC Department of Public Instruction, the NC Community College System, the University of North Carolina System, and the NC Independent Colleges and Universities. The committee issued guidance that specifically includes a recommendation that students have access to all support resources on college campuses, including disability support services.
 - ▶ Minnesota statute requires higher education institutions offering concurrent enrollment to form an advisory board to bring stakeholders together and serve as a coordinating entity between secondary education and postsecondary institutions. The statute also requires postsecondary institutions to provide the support services described in the student's Individualized Education Program with the secondary and postsecondary institutions negotiating the appropriate charge for these services.



FINANCE

States explore funding mechanisms that can ameliorate the cost of additional supports and services students with disabilities need to participate and excel in college level work in high school.



Why This Matters

Gaps in access to college in high school programs for students with disabilities will never close while perceived cost barriers remain and providing additional supports is seen as an unfunded mandate. States need to push as far as they can to help schools leverage all existing funding sources and potentially develop new mechanisms that will forge or strengthen the partnerships between school districts and institutions of higher education.

- **Establish grants to develop and design model programs.**
 - **Washington's** Office of Superintendent of Public Instruction released a special dual credit equity grant that districts can use for efforts to eliminate equity gaps. The grant is intended to focus on “student groups furthest from education justice,” which includes students with disabilities. Funds can be used for student data activities, activities that broaden student readiness, modifications to schedules, expanding program capacity, and covering the cost of dual credit opportunities.
- **Communicate the ways in which federal IDEA and/or Vocational Rehabilitation funds can be used to support students with disabilities' participation in college in high school programs, including transportation.**
- **Review existing funding mechanisms to identify ways to encourage participation of students with disabilities.**
 - **Minnesota** offers Access to Career and Technical Education (CTE) for Students with a Disability (ACTE-SPED) Aid, which districts with already approved programs can apply for and use for

needed equipment, curriculum modifications and training. Though this program focuses primarily on CTE, the innovative funding mechanism is one that could be replicated to support dual enrollment for students with disabilities.

Increasing Postsecondary Opportunities And Success for Students and Youth With Disabilities



In September 2019, the U.S. Department of Education issued a Question & Answer document clarifying that federal funds, both IDEA and Vocational Rehabilitation, can be used to support dual enrollment for students with disabilities if certain conditions are met. Through a Q&A format the document describes how schools and state agencies can work together to leverage these funds to support students and the services and supports they may need.

- **Clarify the potential use of state CTE and federal Carl D. Perkins Career and Technical Education Act (Perkins V) funding in supporting students with disabilities.**
 - For more information on how states can use federal Perkins V funding to support college in high school programs more generally, visit CHSA's fact sheet on the topic.



COURSE ACCESS & AVAILABILITY

States ensure that students with disabilities are able to access college in high school courses with the same pathways that maximize opportunities for all students to earn multiple college credits and facilitate the integration of college in high school programs into federally required transition plans.



Why This Matters

Ensuring equitable access includes making sure courses are available to all students and that artificial barriers aren't in place. In designing college in high school programs, states should also recognize that there are multiple pathways into postsecondary education and the workplace and these must also be accessible to students with disabilities.

- **Make courses accessible to all students.**
 - ▶ The **Texas** early college education program statute specifically targets students who are at risk of dropping out or want to accelerate graduation. In turn, the Texas Education Agency released the Early College High School (ECHS) 2020–2021 Blueprint that identified students with disabilities as historically underrepresented in college courses which should be targeted for enrollment.
- **Challenge the idea of what constitutes a qualified student.**
 - ▶ Key **Vermont** agencies have collaborated to develop the Post-Secondary Education Initiative (PSEI) to promote “college education and industry based career training for transition-age youth with developmental and/or intellectual disabilities (DD/ID) and access to lifelong learning for adults with DD/ID”.
- **Provide flexibilities around eligibility requirements.**
 - ▶ **Ohio's** College Credit Plus allows any participating school to apply for a waiver from program requirements (e.g., eligibility) if the goal is to

improve access for underrepresented student groups. The waiver also requires that the agreement between K–12 and higher education must include “innovative programming proposed to exclusively address the needs of underrepresented student subgroups,” which could be applied to students with disabilities.

- **Explore College Based Transition Services.**
 - ▶ The **Massachusetts** Inclusive Concurrent Enrollment Initiative (MAICEI) is state funded and offers grants to K–12 and higher education partnerships that support eligible high school students with intellectual disabilities, ages 18–22, to increase their academic and career success by being included in a college or university community of learners. While not all students receive college credit, the program serves as a good example of how a state can develop an innovative option for students who may not meet traditional eligibility requirements, but still benefit from concurrent enrollment.²
 - ▶ **Colorado** provides specific guidance to support concurrent enrollment for students with disabilities, noting their right to access these programs as long as they meet eligibility requirements. The document also defines transition services for students 18–21 and provides responses to frequently asked questions on related topics.

² In 2017, Massachusetts offered the first residential program for students receiving transitional special education services at a public university while still enrolled in their local school district.



- **Require student and parent notification of college in high school opportunities as part of the Individualized Education Program (IEP) transition process.**
 - ▶ Twenty states already require students and/or parents to be notified of the availability of dual enrollment programs.
 - ▶ Florida law specifically requires school boards to inform all secondary students and their parents of dual enrollment as an educational option and mechanism for acceleration.
- **Disseminate guidance for the participation of students with disabilities in career and technical education.**
 - ▶ Oklahoma's Career and Technical education system has created a frequently asked questions document regarding students with disabilities. The guide addresses topics such as enrollment and academic credit, IEP meetings, reporting of student progress, support services, and how technology center personnel can find access to disability resources.
 - ▶ Louisiana JumpStart, the state's career and technical education program, has a website of resources for students with disabilities.
- **Lower the required age for transition planning.**
 - ▶ Preparing students with disabilities for the transition to a postsecondary environment takes time and college in high school programs should be a critical lever. Although federal law requires transition planning for students with disabilities to begin at age 16, twenty-three states have lowered the age.
- **Partner with federally funded Parent Information and Training Centers to design a family-friendly manual and outreach opportunities for parents of students with disabilities.**
 - ▶ The Vermont Family Network hosted a webinar in February 2021 with the Vermont Agency for Education titled "Increasing Access & Equity for All Learners: A Community School Approach to Dual Enrollment".

Transition Services Required Under IDEA



Transition services are defined by federal law as activities for students with disabilities that improve their transition to post-school life. Implementation typically begins when the child turns 16 and must include goals for employment, postsecondary education, training, and when appropriate, independent living. The plan must also list the services needed to achieve these goals which may include additional coursework. This transition period is an underutilized tool in the facilitation of college in high school program participation. The U.S. Department of Education has noted in its Transition Guide and previous guidance that these programs could qualify as a transition service and may even be funded as such. These programs could serve as a literal bridge to postsecondary education for students with disabilities. While they still have the support of secondary educators, students and their families can learn how to navigate these new environments and determine what kind of support they would need.



INSTRUCTOR CAPACITY

States develop strategies to support and allay concerns of instructors by encouraging collaboration between K-12 and postsecondary partners as college in high school programs are scaled, in particular connecting K-12 special education and higher education disability resource staff.



Why This Matters

The shortage of teachers qualified to teach college courses to high school students is already acute. Proactively designing resources and training to prepare them to meet the needs of unique learners will go far in expanding access and success for students with disabilities. Educators have long known that the strategies that help students with disabilities are best practices and will benefit all students.

- **Develop resources for faculty.**
 - **Arkansas'** concurrent enrollment policy specifies that college/university faculty guides must include a policy for students with disabilities, among other requirements.
- **Incorporate college in high school opportunities into the documentation and training for special education transition programs and special education directors.**
- **Incorporate the principles of Universal Design for Learning into college in high school programs.**



How National Quality Standards Can Facilitate Support of Students with Disabilities



College in high school programs have historically been developed as local grassroots efforts to expand access to higher education and improve communication and collaboration between secondary and postsecondary education. The National Alliance of Concurrent Enrollment Partnerships (NACEP) provides a set of high-quality, research-driven, best practices embodied in the organization's quality standards. These standards serve as guidance for programs to help unify the field around common practices and approaches.

While NACEP standards do not directly address students with disabilities, several carry implications and could be leveraged to better support and engage this population. NACEP Student Standards, which outline the partner college/university and high school's mutual responsibilities in supporting students, require a variety of elements relevant to working with students with disabilities. The standards that focus on students require, for example, that concurrent enrollment students "are advised about the benefits and implications of taking college courses" as well as that both K–12 and postsecondary partners provide "students with suitable access to learning resources." As a part of meeting the evidence for NACEP's standards, NACEP programs are required to "conduct and report regular and ongoing evaluations of the program," which could easily incorporate success rates for underserved populations including students with disabilities.

Similarly, if program policies were clarified to more explicitly include students with disabilities, NACEP faculty standards could provide a mechanism for the partner college to provide instructors professional development to help them better reach and support these students. For example, from the NACEP Accreditation standards for Concurrent Enrollment Programs (CEP), Faculty Standard 4 states "the concurrent enrollment program ensures instructors are informed of and

adhere to program policies and procedures." If the program's policy stipulated that the provision of services for students with disabilities must be addressed, then this standard could be the mechanism for improving instructors' understanding of and compliance with those services. The accompanying evidence for Faculty Standard 4 requires that applicants submit evidence indicating their procedures and practice guide and a description of instructor orientation. Again, presumably, these would have to include policies related to students with disabilities, which instructors would then have to adhere to if the program is to remain NACEP accredited.

In 2020, NACEP opened a new form of program accreditation to address program models where the college provides the faculty, either at the high school or on the college campus. The 2019 College Provided Faculty (CPF) model standards, include standards for faculty. Faculty Standard 2 is similar to CEP Faculty Standard 4: "The college provided faculty model ensures instructors are informed of and adhere to college/universities' policies and procedures. For college provided faculty teaching high school students." This may create a mechanism to help ensure college policies are applied appropriately.

As of May 2021, there were 119 programs in 24 states accredited by NACEP. Twenty states require, incentivize, or encourage NACEP accreditation. This creates an additional opportunity to better leverage existing structures and national quality standards to support students with disabilities in these programs. States have an important opportunity to incorporate these quality standards into their policies and program guidance and build upon these standards to incorporate more explicit language about including and supporting students with disabilities.

Click [here](#) to learn more about NACEP and its standards.



NAVIGATIONAL SUPPORTS

States prioritize the unique navigational supports and advising that students with disabilities need to ensure success in college in high school courses.



Why This Matters

College in high school programs should not be sink or swim. All students need some level of support navigating the transition and securing the support they need to succeed. Programs must be intentional and thoughtful to ensure that students with disabilities are provided the unique support and advising services they need to maximize their success and ease the transition from secondary to postsecondary learning environments.

- **Mandate that the provision of services for students with disabilities are addressed, understanding that there may be differences among the different types of college in high school programs.**
 - ▶ **Minnesota law** requires the postsecondary institution to inform the pupil of the support services available and further requires that: “If the student has an individualized education program that provides general education support and accommodations, the postsecondary institution must provide the support services as described in the student’s IEP and the postsecondary institution and the district shall negotiate an agreement on the rate to be charged for the services.”
 - ▶ **Rhode Island law** requires that schools offering dual enrollment must adopt the statewide dual enrollment policy promulgated by the state board of education. The regulations require that students with disabilities receive “the protections, services and accommodations as prescribed by federal and state law in accordance with the policies and procedures of the postsecondary institution in the case of dual enrollment or the secondary school in the case of concurrent enrollment.”

▶ **Oregon law** stipulates as part of the Expanded Options Program, the school district in which a student with a disability resides is responsible for providing the services and supports required in a student’s IEP. An institute of higher education may also provide a student with a disability these services by entering into a written agreement with the school district.

- **Issue guidance to articulate college and high school responsibilities and potentially highlight areas that are unclear and may need legislative clarification.**
 - ▶ The **Utah Concurrent Enrollment Handbook** includes an extensive section on accommodations for concurrent enrollment students. The guide specifies that the institution must evaluate a student’s request for accommodation in accordance with institutional processes, and that an IEP or Section 504 plan can be used as supporting documentation. However, the handbook also specifies that accommodations at postsecondary institutions are not guaranteed. Schools and/or institutions are also expected to provide access for students with a physical disability.

The handbook offers an interesting distinction between secondary and postsecondary education:

- ① A public education IEP or Section 504 plan is designed to facilitate a student’s success in school, while postsecondary accommodation(s) is designed to ensure access to postsecondary education; and
- ② Public education looks to its students and makes an assessment of their physical and academic needs, while postsecondary education expects students to declare a need and request accommodation.



- **Incorporate college in high school opportunities into transition training and documentation.**

In August 2020, the **U.S. Department of Education** updated “A Transition Guide to Postsecondary Education and Employment for Students and Youth with Disabilities” and included information on dual enrollment noting:

The Office of Special Education Programs has stated in prior policy guidance that, if under State law, attending classes at a postsecondary institution, whether auditing or for credit, is considered secondary school education for students in grade 12 or below and the education provided meets applicable State standards, those

services can be designated as transition services on a student’s IEP and paid for with IDEA Part B funds, consistent with the student’s entitlement to FAPE (Free and Appropriate Public Education).

- **Build joint trainings and resources for high school counselors and college advisors that also include special education directors and leaders of campus disability resource centers.**
- **Identify successful programs and develop plans to scale.**

FIGURE 1 Gaps in Representation by State: Students Served Under IDEA

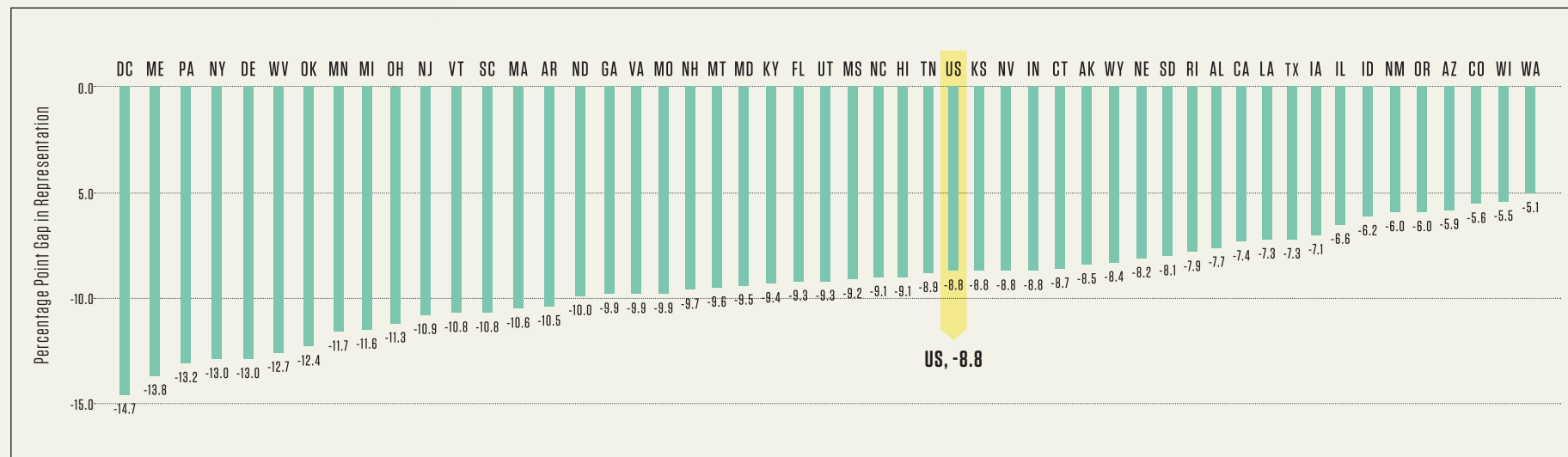
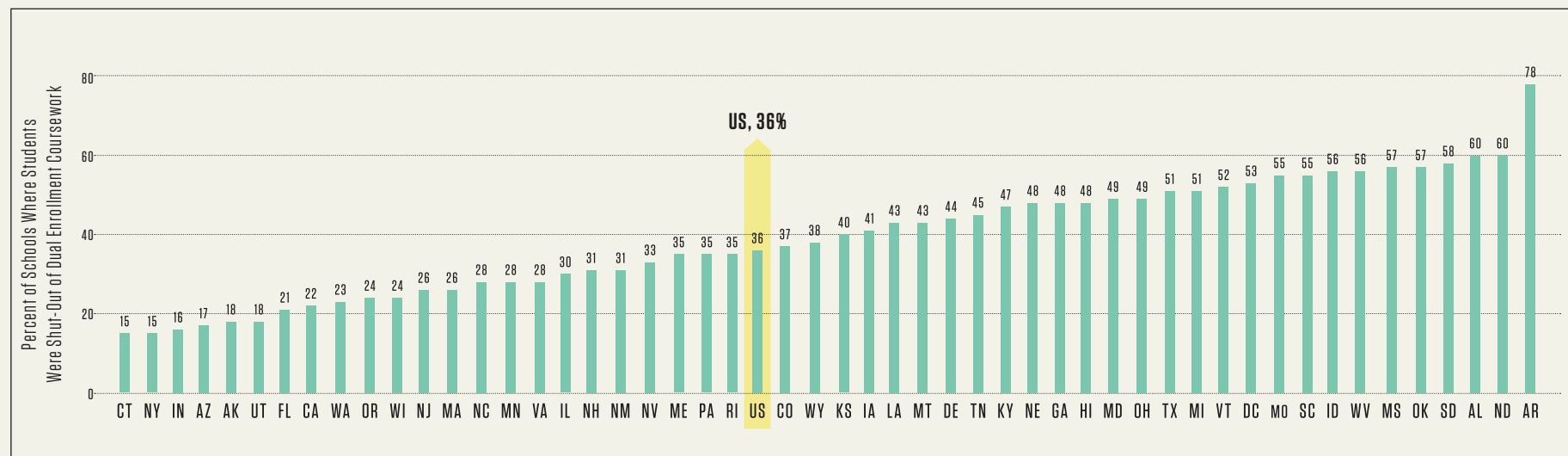


FIGURE 2 Percent of Schools Where Students Served Under IDEA Are Shut-Out of Dual Enrollment





COLLEGE IN HIGH SCHOOL
ALLIANCE

collegeinhighschool.org