

CLOSING THE EQUITY GAP

in Dual Enrollment for Rhode Island's Differently-Abled Students

A POLICY ROADMAP



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Rhode Island's Unique Landscape Analysis: A Policy Roadmap for Supporting Equity in Dual Enrollment

Early college opportunities offer enormous benefits for students and families. Not only can these courses help high school students earn valuable college credit for free, they also prepare students for college level work and improve their chances of graduating high school, enrolling in college, and completing college degrees on time. Best of all, these exciting benefits apply to students of all abilities.

Rhode Island has worked diligently to increase access to these programs for all students, but still equity gaps persist. However, the state is well poised to improve dual enrollment participation and achievement for all students, especially those with different abilities.

Through the joint efforts of the Rhode Island Department of Education and the Office of the Postsecondary Commissioner, Rhode Island was chosen to receive technical assistance from the College in High School Alliance (CHSA). CHSA, with support from its Steering Committee member organization KnowledgeWorks, has been supporting Rhode Island's efforts to increase dual enrollment participation for its differently-abled students.

Using their recently released framework, KnowledgeWorks has created this unique landscape analysis for Rhode Island. This policy roadmap identifies both the barriers faced by differently-abled students¹ in accessing dual enrollment as well as specific action steps Rhode Island can take to address these barriers.

We are pleased to be a part of the effort to support equity in dual enrollment, and we hope you will join us in extending the life-changing benefits and opportunities of dual enrollment to more students.

...

College in High School Alliance

¹ Rhode Island has adopted the term "differently-abled students" for their students with disabilities.

Expanding Access to Dual Enrollment for Differently-Abled Students in Rhode Island

Rhode Island has demonstrated a strong commitment to supporting students in taking free college courses while still in high school. In 2013, the Rhode Island General Assembly passed legislation calling for the adoption of a statewide policy for dual enrollment that allows students to take college courses and earn credit at both a secondary school and higher education institution. Subsequently, the Rhode Island Board of Education built out that policy and adopted regulations in April 2015 that provided all qualified Rhode Island high school students access to college level coursework while still in high school.

Students can now access college level courses through concurrent enrollment at their high school and through dual enrollment at both public and private postsecondary institutions in the state at no cost to the student.² Courses are paid for through either the PrepareRI Dual Enrollment Fund or the All Course Network. Moreover, full and part-time dual enrollment student costs and course materials (e.g., art supplies or books) are covered as well. Students are able to pre-register for courses through the state's EnrollRI platform and be fully registered once a counselor from their school has granted final approval.

Even though state policies are in place to serve all students regardless of race, identity, background, or ability to pay, participation rates for historically-underserved students still lag, in particular differently-abled students. The state's *PrepareRI Dual Enrollment Fund 2021 Annual Report* noted that only 2% of dual enrollment students were differently-abled even though they represented 16% of the total student population.

PrepareRI is the state's comprehensive initiative to prepare all Rhode Island youth with the skills they need for jobs that provide a living wage. In 2015, the state's baseline year, 5% of Rhode Island students earned college credit or an industry credential. By 2020, that number had risen to 31%.

One of the initiative's key goals is that "all high school students will have access to opportunities to earn college credit or industry credentials." Thus, improving access to dual enrollment is an essential component of this strategy. By including disaggregated data in the report, Rhode Island demonstrates its recognition that improving the numbers for differently-abled students plays a key role in the strategy.

Beginning with the Data

While many states are still struggling to meet basic federal data requirements to disaggregate data, Rhode Island serves as a stellar example. The state has included data for differently-abled students in a variety of ways.

- The Rhode Island Department of Education (RIDE) Strategic Plan includes "ability" status in the Equity Priority Statement and differently-abled students are woven all throughout the plan.
- The goal of the state's Learning Equity Accelerated Pathways Task Force and its final recommendations were to lay out a community-driven roadmap to accelerate learning equitably coming out of the pandemic. Differently-abled students were recognized as students who were disproportionately impacted by the pandemic.

² For the purposes of this report, dual enrollment refers to both unless otherwise specified.

- The Postsecondary Success Index on the state and district report cards is disaggregated by all subgroups, including students with disabilities.³
- Rhode Island law already requires a dual enrollment report that is currently being served by the PrepareRI Dual Enrollment Fund Annual Report. State board regulations (200-RICR-10-00-1.3.7 Reporting) offer further direction, in particular, a requirement to include participant demographics.⁴ There are efforts underway to combine this with other reporting requirements.

With student participation data on hand, Rhode Island is ready to improve access and success.

³ The Postsecondary Success Index is defined as the percentage of students earning credentials beyond a high school diploma before graduating as measured by the percentage | ⁴ Regulation 1.3.7 <https://rules.sos.ri.gov/regulations/part/200-10-00-1>

“ ENSURING EQUITABLE ACCESS INCLUDES MAKING SURE *[concurrent enrollment] 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.”*

Excerpt from *Unlocking Potential: A State Policy Roadmap for Equity and Quality in College in High School Programs for Students with Disabilities*

Use Dual Enrollment to Illuminate a Clear Pathway to Postsecondary Education for Differently-abled Students

States across the nation are developing new student pathways, and Rhode Island is no exception. In fact, the idea of making multiple pathway opportunities available to all students is a cornerstone of Rhode Island's graduation requirements.

With intentional design, states can ensure their federally-required transition goals and activities for students with disabilities seamlessly complement and supplement state graduation requirements. Transition plans are often an underutilized tool in the facilitation of early college opportunities when these plans should be the foundation for the pathway.

Under the Individuals with Disabilities Education Act (IDEA), students with disabilities are required to have Individualized Education Plans (IEPs), and when the student turns 16, the IEP must include a plan for transition to post-school life. The transition plan must include goals for employment, postsecondary education, training, and—when appropriate—independent living along with the services and support the student will require to achieve these goals. Rhode Island has already recognized the importance of this transition plan by lowering the age requirement to 14.⁵

As the state continues to refine graduation requirements, the Rhode Island Department of Education (RIDE) has an opportunity to develop the supplemental materials necessary for school-based special education staff to align transition goals and services. RIDE already has an impressive array of resources the state can use to create clear pathways to postsecondary education for students with disabilities.

- **Leverage the State Transition Council:** The Council is statutorily authorized and its membership includes students, parents, representatives of local education agencies, and key state agencies. The Council should consider adopting dual enrollment pathway development as a goal and incorporate recommendations into the annual report required in statute.
- **Partner with Regional Transition Centers (RTCs) and Regional Transition Advisory Committees.** The Rhode Island RTCs “provide direct technical support, training and information on transition services to school personnel in each region and assist in the development of statewide training and information activities.” The centers also host a secondary transition website with specific college planning resources, yet none currently include concurrent enrollment. By their very design, the RTCs and committees are the perfect partners to support pathway development and vet newly developed resources to facilitate dual enrollment in transition planning.
- **Coordinate efforts with PrepareRI Action Plan.** The goals of PrepareRI are synonymous with the transition planning requirements for differently-abled students. The aforementioned State Transition Planning Councils and the regional centers should partner with PrepareRI to discover how they might support each other's efforts. This effort should include a review of the numerous resources contained on the PrepareRI website to ensure that the unique needs of differently-abled students are considered.

⁵ § 16-24-18 (d) Transition from school to self-sufficient adulthood for students with disabilities. | ⁶ § 16-24-18 (a) Transition from school to self-sufficient adulthood for students with disabilities.

The Federal Take on Dual Enrollment for Students with Disabilities



The U.S. Department of Education spotlights dual enrollment in the Transition Guide to Postsecondary Education and Employment for Students and Youth with Disabilities, which states, “IEPs for students with disabilities could include transition services in the form of coursework at a community college or other postsecondary institution, provided that the State recognizes the coursework as secondary school education under State law.” The definition of dual and concurrent enrollment in Rhode Island law⁷ meets these criteria.

⁷ 22-35-103 (6)(a)

Reimagine the Use of Individual Learning Plans for Differently-Abled Students

Individual Learning Plans (ILPs) are authorized in state board [regulations](#)⁸ and play a prominent role in both [Prepare RI Action Plan 2.0](#) goals as well as state graduation requirements. RIDE has taken steps to ensure differently-abled students develop ILPs, including requiring data for differently-abled students in the [ILP data dashboard](#). Even so, schools may need more clarity and support.

- **Align age requirements.** The [ILP Adoption Toolkit](#) states that the ILP supports students directly by, “coordinating additional supports students are receiving which may be documented in Individual Education Plans (IEPs), support plans, literacy plans, transition plans, and other documents for student supports.” However, coordination is made more difficult when the age requirements don’t align. Rhode Island lowered the age for IEP transition planning from 16 to 14, yet for ILPs planning begins in 6th grade.
- **Clarify the relationship between ILPs and IEPs.** PrepareRI describes ILPs as, “a dynamic tool that maps academic plans, and reflects each student’s unique set of interests, needs, academic and career goals, and graduation requirements.” On its face, this definition appears very similar to the IEPs required by federal law for differently-abled students. This may be a source of confusion for schools. To provide more clarification and support to school staff, Rhode Island could add a specific section to the ILP toolkit elaborating on the need to coordinate ILPs and IEPs. A template or examples for differently-abled students might be helpful.

- **Amend annual report requirements.** RIDE has developed an online form that districts are required to complete for the annual report. The department could add specific questions to obtain more information on how districts are addressing the ILPs for their differently-abled students.
- **Utilize the ILP Professional Learning Group.** One of the strongest assets RIDE has for this work is the ILP Professional Learning Group. The group, in partnership with staff from special education, could serve as the perfect forum to review and vet all ILP resources to ensure messaging is clear and consistent.

Washington State’s My High School and Beyond Plan



Washington developed [guidance](#) with a case study for students with disabilities to use with their High School and Beyond Plans. The sample IEP goals for transition are especially noteworthy.

⁸ State Board of Education 200-RICR-20-10-2.1.16

Identify Any Barriers to Dual Enrollment Participation for Differently-Abled Students

Rhode Island has established a solid foundation from which to grow and develop its dual enrollment program, and the state has made an intentional effort to ensure differently-abled students are included. The state enrollment platform (EnrollRI) and the All Course Network have facilitated new student participation, however, Rhode Island could take more steps to identify and remove any remaining barriers preventing differently-abled students from participating in dual enrollment opportunities. Here are steps the state can consider:

- **Form a student advisory council.** RIDE has prioritized student voices, and a new council could provide feedback on the ease of use of EnrollRI and the All Course Network, particularly for differently-abled students.
- **Review locally-adopted eligibility criteria.** The Regional Transition Coordinators are well poised to partner with school counselors and special education staff to review the eligibility criteria for dual enrollment and offer recommendations.
- **Amend the state's [Opportunities for High Schoolers to Earn College Credit](#).** The guide provides a thorough review of the early college opportunities available, but explicit instructions on how differently-abled students can access this would be helpful.
- **Adopt the [RISE Act](#).** Based on legislation introduced in Congress, this bill lists the documentation that higher education institutions must accept from students to demonstrate that they have a disability.
- **Amend state board regulation.** The proposed changes to Regulation 1.3.4 regarding Student Eligibility Criteria could facilitate support for the participation of differently-abled students in dual enrollment. Consider the proposed changes in red in the box to the right.

About the RISE Act



Proposed federal legislation known as the RISE Act would require that the same documentation necessary to demonstrate a student had a disability in K–12 suffice in higher education. This change would remove a significant obstacle K–12 students with disabilities face when matriculating to college. Arizona became the first state to pass the RISE Act when Governor Doug Ducey signed [Arizona House Bill 2031](#) in 2022. Rhode Island could become the second.

Recommended Revisions to the [State Board Dual Enrollment Regulations](#) on Student Eligibility Criteria for Dual and Concurrent Enrollment Coursework

“Secondary school students may take dual and concurrent enrollment coursework upon the approval of their principal, director or head of school, **or special education director** in accordance with local enrollment criteria. The criteria shall be based on the student’s academic, behavioral, and attendance record and, if applicable, the student’s results on an ACT, SAT, ACCUPLACER, PSAT, EXPLORE or state standardized assessments. Student age or disability will not be a determiner of enrollment. **Dual and concurrent enrollment coursework may be used to fulfill transition goals for differently-abled students.** Postsecondary institutions shall establish eligibility criteria and, if applicable, assessment standards to determine college readiness.”

Increase Awareness of Dual Enrollment Opportunities for Students with Disabilities and Their Families

Any effort to increase access to early college opportunities must include a parent engagement strategy. Every state has parent and information centers supported by federal funds. In Rhode Island, the [Rhode Island Parent Information Network](#) fulfills this role. RIDE and ParentRI should engage the Network in a partnership to encourage the participation of dual enrollment by differently-abled students.

- Utilize the [Rhode Island Parent Information Network](#) to encourage participation of differently-abled students in all early college opportunities and partner with RIDE in the development of specific guidance for parents.
- Amend State Board policy to include the unique benefits to differently-abled students and the ability of dual enrollment to also satisfy transition plan requirements.

The Rhode Island State Board dual enrollment policy⁹ very wisely included a requirement that local school committees provide students and their families with information about dual enrollment, including the benefits and consequences of these opportunities. The regulations provide a list of items that schools must include, and RIDE is directed to develop an exemplar. The Board should consider adding language specific to differently-abled students and how schools can use dual enrollment courses to support the transition goals required by federal law.

⁹ Rule 1.3.5 Student Supports

*“ 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.”*

Excerpt from *Unlocking Potential: A State Policy Roadmap for Equity and Quality in College in High School Programs for Students with Disabilities*

Collaborate to Develop a Suite of School Resources

While many states are still debating the role of IEPs in dual enrollment programs, Rhode Island has provided clear guidance:

State Board of Education Regulation 1.3.4 (D) Student Eligibility Criteria —

Students with disabilities or students who are English Language Learners shall 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.

The policy seems clear, yet schools need additional guidance. When it comes to providing students with disabilities the services and accommodations they are entitled to, Rhode Island's policy differentiates decision-making authority by where the classes are held, which can spark some debate.¹⁰ Regardless of whether federal or state law prevails, the collective goal is to improve access and success. Furthermore, accommodations have the same meaning in both secondary and postsecondary institutions, but there are often misunderstandings regarding the different processes used to determine them and what types are allowed.

The following strategies may clarify roles and offer stakeholders opportunities to collaborate to improve access and success for students.

- **Elaborate on PrepareRI guidance to clarify stakeholders' roles.** The guidance spotlights the fact that there is still much K–12 staff can do to facilitate a student's transition to postsecondary education through dual enrollment. It contains a helpful use case, but others are needed.
- **Convene stakeholders.** By gathering both K-12 and higher education disability-related support staff, Rhode Island could streamline and potentially align the different processes of determining accommodations.
- **Develop a joint accommodations manual.** The Council of Chief State School Officers provides a good example of such a manual, *How to Select, Administer, and Evaluate Use of Accommodations for Instruction and Assessment of Students with Disabilities*. Ensure that accommodations and modifications are differentiated. The National Center on Educational Outcomes has also developed an [accommodations toolkit](#) that could be helpful.

Accommodations versus Modifications



An **accommodation** changes **how** a student learns the material.

A **modification** changes **what** a student is taught or expected to learn. These terms are often conflated, yet they are quite different. For more information and resources, visit [ADA Technical Center Understood](#), and the [Association on Higher Education and Disability \(AHEAD\)](#).

¹⁰ Note that 80% of dually enrolled students nationally take their college courses at their own school. Source: <https://www.nacep.org/resource-center/nacep-fast-facts/>

Explore Funding Mechanisms to Design Model Processes and Develop Supportive Resources

Funding is, of course, fundamental. From replicating proven grant programs to redirecting existing dollars, the following strategies could help Rhode Island support more successful dual enrollment opportunities for differently-abled students.

- **Replicate successful funding strategies.** For example, the CTE Innovation and Equity Gap Grants is a creative strategy that allows schools to design new processes to open up more dual enrollment opportunities for differently-abled students.
- **Use existing funds to engage differently-abled students.** Communicate the ways schools can use federal funds—such as IDEA and Vocational Rehabilitation funds—to increase participation of differently-abled students in early college opportunities (e.g., transportation).
- **Change state board regulations.** Amend regulations for dual enrollment (200-RICR-10-00-1 Section 1.3.3 Costs) to include the unique federal funding options afforded differently-abled students.

“ 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.”

— *A Transition Guide to Postsecondary Education and Employment for Students and Youth with Disabilities.* Washington, D.C., 2017