THE PATH TO POLICY
Next Steps in Building an Equity-Focused Statewide Policy for New York’s College in High School Programs
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All photos courtesy of [Allison Shelley/The Verbatim Agency for American Education: Images of Teachers and Students in Action](#).
Many of the innovations that have catalyzed the national college in high school movement’s focus on structured programs, equity of access, and intentional high school and college partnerships, were forged in the state of New York.

The progenitor to the early college high school, the middle college, began at LaGuardia Community College in New York in the 1970s. Some of the nation’s first early college high schools, such as the Bard High School Early Colleges, opened in New York in the early 2000s. And New York is the birthplace of the Pathways in Technology Early College High School (P-TECH) movement in the late 2000s. Expansion and innovation of dual enrollment is a core part of New York’s education ecosystem.

But, as of 2023, New York is also one of only two states (including Pennsylvania) that does not have a statewide policy governing program purpose and function for its dual enrollment programs. Practitioners are beginning to ask policymakers to take action on creating statewide policy for New York’s college in high school programs that would build on the strong foundations of New York’s work to date and unlock new opportunities for students—particularly for historically marginalized learners—to participate in these opportunities.

A statewide policy for New York’s College in High School programs should be carefully developed, built on a strong vision for how to ensure equity of access and success to ensure high quality programming.

It should also serve to propel the great work happening in many programs across the entire state. This is particularly true given the existing size and scale of college coursetaking in high school in the state of New York, current initiatives in New York City to support college in high school programs and pathways work generally, and the well-established existing models.

The College in High School Alliance (CHSA) published a paper in late 2020 that provides a number of recommendations for a path forward for New York’s college in high school programs. Those recommendations remain valid, and should be considered in a statewide process inclusive of all the models within New York’s diverse community of college in high school programs.

Today, New York has a unique opportunity to ground the important work happening all across the state to expand access to college courses for high school students in equity by taking two very important steps:

- **Articulate a Vision for College in High School Programs in New York State:** State education leaders should clearly articulate the value of college in high school programs for students and for the state of New York and explain the role that these programs should play in advancing equity in the state’s broader education ecosystem.
Convene Stakeholders in an Inclusive Process to Design State Policy: The state needs to implement a process to reach agreement on statewide policy. The policy should be inclusive of the perspectives of the different models of college in high school program in the state, including dual enrollment, concurrent enrollment, early college high school, and P-TECH. A statewide policy should aspire to provide one state policy architecture addressing the needs of these programs, grounded in the state’s vision.

The development of this paper was based on a series of listening sessions hosted by CHSA with policymakers and practitioners from across the state in late 2022 and early 2023, including an all-day convening in Albany, New York in January, 2023 attended by invited stakeholders from across New York. The listening sessions and the follow up convening were organized by the College in High School Alliance in partnership with Bard College, the City University of New York, the Capital Region BOCES, the Middle College National Consortium, and the State University of New York.

What we heard throughout this process was a common theme: the time is now to consider laying out and implementing a path to a statewide policy for New York, to unlock the potential of the important, significant work already happening in the state, and to propel New York into the ranks of national leaders on the policies and practices supporting college in high school programs.

What Are College in High School Programs?

While there can be significant variation among college in high school programs in terms of modality, structure, and what we call them, CHSA has developed a definition of the core elements that all college in high school programs share, regardless of their differences in program structure or nomenclature:

**College in High School Programs 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 transcripted and transferable college credit towards a recognized postsecondary degree or credential.**

In New York, there are three major types of college in high school program:

- **Dual or Concurrent Enrollment Programs:** Many high schools offer students the opportunity to take a college course from a college partner that the high school has developed a relationship with. Students may participate in courses at the college campus or receive instruction at the high school, and programs may have differing levels of structure and costs.

- **Early College High Schools:** The early college high school model—which includes Smart Scholars Early College High Schools—initially expanded in the early 2000s with support from the Bill & Melinda Gates Foundation. It is a specific whole-school model in which high school students have the opportunity to earn up to an associate’s degree by the time of high school graduation at no cost. Early college high schools provide additional support services to students, and intentionally recruit students who are underrepresented in higher education.
• **Pathways in Technology Early College High Schools (P-TECH)**
  First launched in 2011 in New York City, P-TECH is a six year program from grades 8–14, in which students graduate with both a high school diploma and an associate’s degree. The model is a public-private partnership between a school district, an institution of higher education, and an employer. IBM pioneered the model as the first industry partner engaged, but the model has expanded across the country and now includes a number of business partners.

For more information on the different types of college in high school program, how they differ, and what other terms can be used to describe them, please see CHSA’s Glossary of Terms.
THE BENEFITS OF STATEWIDE POLICY

A Strong Foundation to Grow

Even without a statewide policy, New York has accomplished significant and growing participation in its college in high school programs. According to data from the Integrated Postsecondary Education Data System (IPEDS), over 10 percent of New York’s postsecondary enrollments were from students under 18, who are overwhelmingly participating as part of a college in high school program.
New York now has the opportunity to build upon the work done to date by practitioners and create a statewide policy that supports a clear equity-based vision for advancing this work. With thoughtful alignment across the state’s existing competitive grant programs that support early college high schools (Smart Scholars and Smart Transfer) and P-TECH programs (Pathways in Technology Program), a unifying statewide policy for this work that is inclusive of the different college in high school models can provide a clear direction for the growth of college coursetaking by high school students.

Statewide policy has the potential to catapult New York into a leader in this field. Currently, through its native capacity, New York ranks 25th in the nation in terms of the size of the state’s college in high school programs compared to its postsecondary enrollments as a whole. Thoughtful statewide policy and funding that expands access to college courses in high school for historically marginalized learners across the state can accelerate New York up the rankings to a national leader and example for the rest of the country.

### College in High School Programs Benefit Students

College in high school programs are important college access and success strategies, particularly when they are set up and operated to serve students who are underrepresented in higher education. As every state grapples with postsecondary enrollments that have not yet recovered from the significant declines experienced during the COVID-19 pandemic and an ongoing need for additional postsecondary and workforce training to prepare workers for the economy and jobs of the next several decades, these programs are an important research-backed strategy to advance the state’s goals.

The benefits of dual enrollment are clear. A recent review of the research on dual enrollment and early college high school reveals:

- **Dual Enrollment is an Evidence-Based Practice that Has Broad Positive Impacts on Student Outcomes:** Participation in these programs improves a student’s likelihood of graduating high school, enrolling in college, and completing college, with studies that show these impacts are larger for students from low-income backgrounds and underrepresented students in higher education, and those students who don’t meet traditional readiness metrics.

- **Dual Enrollment Expands Learning Opportunities and College Access, and Has the Potential to Improve Local Communities:** More access to dual enrollment leads to better college outcomes for students, which creates a more educated populace who can contribute more to the local economy.

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**Rank State Dual Enrollment Participation**

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<thead>
<tr>
<th>Rank</th>
<th>State</th>
<th>Dual Enrollment Participation</th>
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<tbody>
<tr>
<td>22</td>
<td>Ohio</td>
<td>10.38%</td>
</tr>
<tr>
<td>23</td>
<td>Tennessee</td>
<td>10.31%</td>
</tr>
<tr>
<td>24</td>
<td>Washington</td>
<td>10.25%</td>
</tr>
<tr>
<td>25</td>
<td>New York</td>
<td>10.19%</td>
</tr>
<tr>
<td>26</td>
<td>Hawaii</td>
<td>10.17%</td>
</tr>
<tr>
<td>27</td>
<td>Alaska</td>
<td>10.07%</td>
</tr>
<tr>
<td>28</td>
<td>Mississippi</td>
<td>9.89%</td>
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<td>...</td>
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Source: IPEDS Data as Presented by the Community College Research Center

Note: States are ranked based on the proportion of students enrolled in postsecondary education in the state who are under the age of 18, which is currently accepted as an appropriate proxy for participation in a college in high school program.
• **Dual Enrollment Addresses Increasing Demand for College-Level Education and Increasing College Costs**: Dual enrollment provides students with access to free college course experiences, potentially reducing the overall costs of college.

• **Dual Enrollment has Broad Support from Students, Families, High Schools, Colleges, and Policymakers**: Support for these programs from different stakeholders is strong and bipartisan.

Importantly, however, organic growth of these programs is not enough to ensure that these opportunities are equitably available for students, and particularly for those students who could benefit the most. There are significant equity gaps in access to these programs nationally and in New York State that policy needs to be deployed thoughtfully to address.

According to an analysis by the Community College Research Center (CCRC) conducted using the US Department of Education’s Office for Civil Rights’ Civil Rights Data Collection (CRDC) for school year 2017–2018, Black, Hispanic, English learners, and students with disabilities are underrepresented in New York’s college in high school programs statewide from the populations that CRDC collects for.

<table>
<thead>
<tr>
<th>New York’s Statewide Participation Gaps for Dual Enrollment</th>
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<tr>
<td>Students with Disabilities: -13%</td>
</tr>
<tr>
<td>Hispanic: -11.4%</td>
</tr>
<tr>
<td>Black: -9.1%</td>
</tr>
<tr>
<td>English Learners: -6%</td>
</tr>
<tr>
<td>American Indian: -3%</td>
</tr>
<tr>
<td>Multi-Racial: -3%</td>
</tr>
<tr>
<td>Pacific Islander: -1%</td>
</tr>
<tr>
<td>Asian: 1.3%</td>
</tr>
<tr>
<td>White: 19.7%</td>
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</tbody>
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Statewide policy, particularly if it is paired with targeted funding to expand access to underrepresented students and provide them with the supports necessary to ensure their success, can significantly contribute towards closing these gaps. But without a policy, the state is entirely reliant on the native capacities of the partnering high schools and colleges, which means that the best programs are going to be located in the communities with the highest resources to dedicate to this work or the commitment of leadership to prioritize it, while equity gaps widen in other communities.

State policy presents a north star to align all three major models within the state—dual or concurrent enrollment, early college high schools, and P-TECHs—behind a common mission and create a statewide culture where all three programs see themselves as partners in advancing student access and success for underrepresented students, and not competitors. It also has the potential to advance equity of access and success for students—especially those who have been historically excluded—and serve New York’s education and workforce goals.
The Right Moment to Act is Now

During this process, CHSA hosted listening sessions that involved approximately 150 practitioners, drawn from both K–12 and higher education across the state of New York in late 2022 and early 2023, as well as a small convening of invited stakeholders representing the breadth of New York’s college in high school program community in January, 2023. The listening sessions and convening were also attended by senior policymakers from the Board of Regents and the New York State Education Department.

CHSA’s engagement with New York has also been taking place alongside significant outreach and discussions held by local partner organizations including The Education Trust New York, and from national partners such as Empower Schools, the Education Commission of the States, and the Community College Research Center. There is significant energy behind these efforts from the practitioners all the way up to the senior policymakers, and now is the time to act upon that energy to make real change for New York students.
Articulate a Vision for College in High School Programs in New York State

State education leaders should clearly articulate the value of college in high school programs for students and for the state of New York, and explain the role that these programs should play in advancing equity in the state’s broader education ecosystem.
Stakeholders across New York believe that the state needs a vision for its college in high school programs that is grounded in equity, advances college access and success for all students, particularly those who have been historically excluded from higher education, and serves the state’s economic and workforce goals.

A clear and well articulated vision – that is built upon this foundation through hearing the voices of the different stakeholders relevant to New York’s college in high school ecosystem and reflective of the perspectives of the three major program types active in the state – can create a northstar for the state’s policymakers and practitioners to rally around. It should provide the opening for establishing for policymakers in New York the rationale for this work, and ground any discussion around creating policy or funding incentives.

New York should undertake an official, state endorsed initiative to develop a comprehensive vision for college in high school programs in the state and provide a state-level answer to the question: why are we doing this? Consulting with stakeholders from across New York and with students who both choose to participate in these programs and those who do not, should contribute towards a vision that answers three key questions:

1. What are the goals of the state’s system of college in high school programs, both for students and the state?
2. What is the ideal experience that students should be having from participating in a college in high school program, regardless of program type or modality?
3. Who are college in high school programs for?

The development of this vision should also include a broader effort to establish the value of college in high school programs to the state of New York. Other states have conducted research projects on the impact of participating in college in high school programs for the state’s students (see examples from Massachusetts, Texas, Colorado, and Kentucky), or developed return on investment analyses (see existing analyses here) that establish the underlying value of making state investments in these programs.

New York is limited by a lack of data in being able to set a specific goal for its college in high school programs like Kentucky’s recently approved Dual Credit Attainment Goal, but the state can develop a narrative vision underlining the why for this work, as well as invest in additional research to provide New York-specific data on the impacts of participating in college in high school programs on students’ college and career success.

Visions explain what we care about and why. To create a rallying point for the college in high school programs in New York around statewide policy and funding to support this work, a vision for college in high school programs in the state is essential to ensure policy and funding is targeted on advancing state and student priorities.
The state needs to implement a process to reach agreement on statewide policy. The policy should be inclusive of the perspectives of the different models of college in high school program in the state, including dual enrollment, concurrent enrollment, early college high school, and P-TECH. A statewide policy should aspire to provide one state policy architecture addressing the needs of these programs, grounded in the state’s vision.
To inform the development of statewide policy, New York needs to create a process for designing statewide policy that is inclusive of dual or concurrent enrollment, early college high school, and P-TECH. It should include the New York State Department of Education, New York City Public Schools, other relevant policy actors, and the major providers of college in high school programs statewide. The process should also include the input of stakeholders from across the state to reflect both the diverse needs of New York City’s college in high school programs and those upstate.

It is essential that a policy process be collaborative across the three major college in high school programs because a transformative statewide policy that invests in this work in the way it is needed will require the biggest stakeholder group possible to advance. In addition, if the state’s vision for college in high school programs is focused on expanding access for underrepresented students in higher education, providing students with support services to ensure their success, and a commitment to keeping these programs cost-free for students, then there is so much more that unites all of the college in high school programs in New York than divides them.

In recent years, as the different types of college in high school program in New York have begun to compete for funding and attention from policymakers, this has created a competitive ecosystem within which advantaging one type of college in high school program is assumed to harm a different one. But the reality is, these programs are all providing high school students with access to college course experiences, and as long as there is a strong vision for what kinds of values we want to advance in statewide policy, there can be common ground, collaboration, and a coordinated policy and advocacy effort on behalf of the state’s practitioners.

Based on feedback received from stakeholders in the listening sessions conducted to date, a statewide policy that is inclusive of the three major models of college in high school program could consider the following strategies.

**Creating a Governance Structure for New York’s College in High School Policies**
New York needs a clear governance structure for its college in high school programs that vests the responsibility of implementing college in high school policies that have been authorized by the legislature into either one policy actor, such as the New York State Education Department or the Board of Regents, or create a shared governance structure that provides the state’s college in high school programs with necessary clarity to advance this work.

**Building a Data Collection and Reporting System for New York’s College in High School Programs**
Because New York currently lacks any statewide data collection and reporting on access and success to college in high school programs, there is too much guessing about where the gaps exist, and what constitutes effective practice in serving students in New York. The state needs to work urgently to develop a data collection and reporting system for college in high school programs that examines student access and success, disaggregated by student population.

**Creating a Sustainable Funding Mechanism for College in High School Programs**
The state should create a sustainable funding mechanism for college in high school programs that commits to closing equity gaps, promoting high quality, and ensuring student success. Currently, a number of postsecondary partners that offer dual enrollment are reaching the limits of what they can provide by way of college in high school programming without additional funds, and several have started to move towards implementing charges on the school district or students to meet their needs. This will serve as a severely limiting challenge to long-term statewide growth, particularly in expanding access to low-income students, if it is not addressed.
The state has a significant opportunity to consider how state funding should be deployed to support the expansion of equity-focused college in high school program experiences for students that are aligned to the state’s college and career goals.

### Supporting High-Quality College in High School Programs That Center Equity
Currently, the ability for an individual high school or school district and institution of higher education to develop their own specific partnership has its upsides and its downsides. It has been a good thing because it has let programs design for the needs of the local community (particularly those that are serving historically marginalized learners), but the uniqueness of every partnership has allowed for the creation of sprawling inconsistencies program to program, even within the same college partnership where one set of conditions might exist at one high school but a different set of conditions at another. The state should consider how to support high-quality programs, particularly those that are focused on equity of access, through either incentives or requirements. This could include examining the appropriateness of other state strategies (such as Massachusetts’ early college designation process, Oregon’s dual credit peer review, or NACEP accreditation requirements) in a New York context.

### Providing Student Supports
New York should develop policies and incentives to provide students with the supports they need to be successful in college in high school programs. This includes funding, state supported professional development, and community of practice building that benefits the college in high school partners, parents, and community organizations to help students find their way into the courses, make meaningful and intentional choices, and then be shepherded through to success.

### Improving Credit Transfer Policies
The state should provide clearer guidance to college in high school programs about how college credits earned as part of a college in high school program should transfer to other institutions of higher education. In addition, the state should communicate to college in high school programs about the implications of taking college courses in high school for state and federal financial aid eligibility, to ensure students are correctly informed about the implications of participating in these experiences.

### Supporting Teachers and Faculty Who Provide Instruction
New York is not immune from the challenges in finding credentialed teachers who can teach a college course in high school, and the state needs to provide support for teachers to become credentialed, thoughtfully consider potential alternative routes to credentialing, and consider how to embed the necessity of teacher credentialing into the state’s educator preparation programs.

### Establishing Equity-Minded Eligibility Criteria
The current eligibility standards for participating in a college in high school program are different program to program, and developed by the individual college in high school programs. The state should consider developing a consistent baseline of eligibility criteria for programs statewide that is research informed and centers on improving equity of access. This could include a process for programs to be allowed to develop even more inclusive eligibility criteria than the state’s baseline, echoing Ohio’s innovative program waiver process that has been used by its early college high schools.
To develop the process to build out these recommendations, New York could look to other states that have implemented similar processes, such as the Louisiana Dual Enrollment Task Force or the Kentucky Commonwealth Education Continuum. In addition to a collaborative statewide process to develop policy, New York will also need a strong advocacy structure to move those recommendations through the legislative and policy process.

Massachusetts serves as an important leader here, where collaborative statewide advocacy efforts organized by the Massachusetts Alliance for Early College have been extremely successful in converting policy recommendations into policy action, and significantly supporting the growth of equity-focused college in high school programs in that state. The Dual Enrollment Coalition of California is another example of an advocacy group that has seen similar success in creating the conditions for new funding in California. A similar model that is reflective of New York’s college in high school ecosystem but aligned behind a common set of values and principles could be equally effective in New York at advancing these critical conversations.

Developing a statewide policy for college in high school programs in New York grounded in the state’s vision for these programs will be challenging, but is not impossible with a thoughtful and intentional process that includes key voices and centers on collaboration. New York’s high school students deserve no less than efforts to work together to advance opportunities statewide.
CONCLUSION

New York can continue to advance college access and success for New York’s high school students through policies that support college in high school programs that center equity, promote high quality, and ensure student success. Policy needs to be grounded in a clear vision for the role of New York’s college in high school programs within the state’s education ecosystem, and developed through a thoughtful and inclusive process.

New York has the opportunity to become a leading state using college in high school programs as an onramp for student access and success in college and career, and should use this moment to capitalize on that opportunity.
ABOUT THE AUTHOR

This report was authored by Alex Perry of the College in High School Alliance and Foresight Law + Policy, with contributions from Dia Bryant of The Education Trust–New York, Jill Cofield of the State University of New York, Cecelia Cunningham of the Middle College National Consortium, Joe Dragone of the Capital Region BOCES, Chris Gabrieli of Empower Schools, Daryl Hornick-Becker of Bard College, and Andrea Soonachan of the City University of New York.