THE CASE FOR INTENTIONAL DUAL ENROLLMENT

June 2024

From Fragmented to Focused:
Intentional Dual Enrollment and The Federal Role in Maximizing Student Experiences
Introduction

Traditional education pathways from K-12 into higher education are not meeting the needs of today’s learners, workers, and other critical stakeholders as evidenced by the continuously rising costs of college, declining college enrollment rates that cannot solely be attributed to demographic trends, and the changing needs of the workforce. As the requirements of the world of work continue to evolve to respond to new industries, new technologies, and the need for new skills and knowledge, the national education ecosystem and related policy are at a pivotal turning point. As a result, the education policy and practice community must make intentional decisions that expand pathways by reforming the education and workforce ecosystem to better meet learners’ needs and create a springboard for their long-term prosperity.

College in high school programs such as dual enrollment, concurrent enrollment, and early college high schools are research-backed strategies that improve a learner’s ability to access and complete college through allowing high school-age learners to participate in college courses before they graduate high school.¹ In today’s economy, most learners will need a postsecondary degree or credential to command family-sustaining wages in the labor market. College in high school opportunities are a critical component of high-quality pathways that prepare young people for the good jobs of today and tomorrow by supporting learners’ journeys into and through postsecondary education and into the workforce.²

Dual enrollment increases a learner’s likelihood of graduating high school, broadens access to college, increases the likelihood of successful completion of college, and provides opportunities for learners to reduce the time and cost of attaining a degree or credit-bearing postsecondary credential. A wealth of evidence demonstrates that these programs have significant benefits for participating learners, but decades of policy and practice also strongly signal that dual enrollment programs must be high quality and well designed for learners to derive the most significant benefits from their participation.³
INTENTIONAL DUAL ENROLLMENT AS A CATALYST FOR STUDENT SUCCESS

Simply offering dual enrollment courses that provide high school learners with access to college course experiences is not enough on its own to smooth learners’ pathways between secondary and postsecondary. Programs need to have intentional structure that aligns secondary and postsecondary curricula and credits. They also need to provide meaningful learner supports and offer these experiences at no cost to learners from low-income backgrounds. College and career counseling and navigation services are especially necessary for seamless transitions between secondary and postsecondary education. The integration of these features is what will lead to positive results.

When developed with purpose, dual enrollment provides learners with much more than just standalone academic credit—it helps them take the first steps on their specific journey into postsecondary education and career. This resource is designed to explore the ways in which federal policy can support and promote the growth of intentional dual enrollment experiences for learners so that learners can maximize the benefits of participation. Aligned to the agenda laid out in the College in High School Alliance’s (CHSA) The Next Phase of Dual Enrollment Policy: A Vision for the Field, this resource seeks to raise expectations from dual enrollment programs for policy and funding support, and to continue to build the federal and state nexus of policy and funding around dual enrollment that will be necessary to achieve the field’s long-term goals.

DEFINITION OF DUAL ENROLLMENT

The programs through which high school learners participate in college courses go by many names across the country, but for the purposes of this brief the catchall term dual enrollment will be used. This term is applies to any program that meets the following criteria:

Dual enrollment programs are partnerships between school districts and accredited institutions of higher education that provide high school-age learners an intentionally designed authentic postsecondary experience leading to officially transcripted and transferable college credit toward a recognized postsecondary degree or credential.

In addition, dual enrollment is an increasingly significant part of the education ecosystem, and its expansion is having a significant real-time impact on both secondary and postsecondary education. Over the past several years, increases in dual enrollment have significantly arrested the larger
decline in postsecondary enrollments. Recently, the percentage of high school learners taking college courses in states such as Colorado and Kentucky has increased to more than 40% and in states such as Indiana to more than 60%. While a lot of work remains to be done to address significant equity gaps in access to dual enrollment, which are gradually closing in some states and widening in others, dual enrollment is here to stay as a big part of many learners’ high school experiences and their educational journeys into college and career.

A VISION FOR THE FIELD

In November 2023, the CHSA, a national collaborative of organizations that support national and state policymakers in advancing equity-focused, high-quality dual enrollment policy, announced a new vision:

By 2030, all states will have eliminated access gaps for participation and success for historically marginalized students in college in high school programs such as dual enrollment and early college, and have a policy system and funding in place that are designed to ensure students are completing meaningful and intentional college course experiences in high school.

If this vision is realized, quality college in high school programs will serve as a catalyst for closing postsecondary access and attainment gaps, and improving the efficiency and efficacy of transitions into college and career for all students.

To learn more, see The Next Phase of Dual Enrollment Policy: A Vision for the Field.

Central to the CHSA’s vision is the argument that to achieve the most desired outcomes for learners, federal policy has a critically important role to play in expanding access to dual enrollment, shaping program structure, prioritizing equity, and incentivizing intentional dual enrollment experiences for learners. For dual enrollment to become a college access and success tool for every learner who wants it, all programs should be undertaking certain practices, and these practices should be incentivized or otherwise required by the state and federal policy environments that the programs operate within.
From Random Acts to Intentional Dual Enrollment

For several reasons, learners must be able to maximize the benefits that they receive from participating in dual enrollment. Time is a limited resource for high school learners, who are navigating a variety of college and career opportunities, participating in extracurricular activities, and finding out who they are as young adults. As a result, if they choose to spend their limited time on college in high school courses, they must get the most out of those opportunities. In addition, because these experiences often are subsidized in part or in whole by public funds (usually at the state level), maximizing the value of these programs is essential to justify and ensure the continuity of existing public investments.

Too many learners who participate in dual enrollment are doing so in programs that lack intentional program structure and navigational supports. Learners need high-quality counseling and advising to support them in making meaningful course selections that are aligned to their post-high school plans. When learners have to select courses without this support, also known colloquially as random acts of dual enrollment, programs might be successfully offering them the ability to take large numbers of courses but not necessarily helping them advance their college and career journey in a meaningful way. Federal solutions can help push forward the evolution of quality dual enrollment, as national policies can be expansive and therefore high impact. Federal actions can be informed by and amplify hyperlocal best practices to reach more learners.

This issue is reflected in the current federal definition of dual enrollment. This definition, included in the Every Student Succeeds Act (ESSA) and last updated in 2015, is a broad and general catchall. It incorporates every possible program model by emphasizing only one common feature of these programmatic approaches—offering high school learners access to a college course—rather than focusing federal policy and related support on those programs that have a clear vision, focus on equity, and provide intentional and meaningful course experiences for learners. This definitional challenge is not limited to ESSA, given its wider use in other federal education and workforce development legislation.
To support learners in maximizing their ability to access and complete college and propel them on their journey into postsecondary and career, dual enrollment programs should be thoughtfully designed to help learners articulate and advance their college and career journey. They should use pathways and Career Technical Education (CTE) programs of study to give learners practical pathways into the college and career of their choice. And they should provide learners with advising and counseling services, including strong career navigational supports, to make informed and beneficial choices around dual enrollment course selection that ensure alignment with a learner’s broader education and career objectives.

DEFINITION OF PATHWAYS

A quality pathway is a set of college and career preparatory experiences that helps young people seamlessly advance from high school to postsecondary education and into family-supporting careers. In many communities, strong pathways are built on a foundation of high-quality CTE.

Jobs for the Future has outlined five key levers for successful pathways:

1. SECONDARY AND POSTSECONDARY INTEGRATION
2. CAREER NAVIGATION SYSTEMS
3. INTERMEDIARIES
4. LEADERSHIP AND POLICY
5. WORK-BASED LEARNING
When is Dual Enrollment Intentional?

Dual enrollment programs that have a thoughtful structure in place to encourage learners to make meaningful and intentional course selections aligned to their college and career goals are those that:

✔ **Structure Dual Enrollment Course Offerings With Pathways and Programs of Study in Mind:** Rather than providing learners an exhaustive list of random courses they can choose among, these programs have developed pathways and programs of study that demonstrate the different opportunities learners have to get started on their college and career journey in a meaningful way. This guidance includes other critical information such as what additional postsecondary and/or career opportunities learners have after completing the course to help them plan for the future.

✔ **Provide High-Quality College and Career Counseling and Navigation:** In addition to using pathways and programs of study, these programs ensure that learners have access to a well-trained and knowledgeable set of adults (including not only learners’ counselors but also teachers and school administrators) who can help learners express their agency around their college and career goals and help them make course selections that will advance those goals.

✔ **Engage With Local Employer Partners:** These programs also have thoughtfully designed their pathways and programs of study to be responsive to the needs of the local labor market, giving learners the biggest leg up in converting their successful dual enrollment experiences into a valuable career.

✔ **Allow Learners to Responsibly Explore College and Career Opportunities:** Many learners do not have a clear sense of what their college and career goals are, and they may not be confident about selecting a pathway or program of study. These programs should provide learners access to a range of highly transferable course experiences that meet general education or foundational course requirements for multiple pathways or programs of study to allow learners the opportunity to explore postsecondary and career while they develop their long-term goals. This includes ensuring that learners have access to age-appropriate career exposure and exploration before high school to help them be informed about their options and future planning.

✔ **Provide Opportunities for Learners Equitably:** These programs ensure that all participants, not just the most privileged, have access to these services, and the programs remain intentionally focused on expanding access to underrepresented learner populations.
Promising State Policies for Intentional Dual Enrollment

NORTH CAROLINA COLLEGE AND CAREER PROMISE (CCP)

CCP offers a CTE pathway that allows dually enrolled learners to earn postsecondary credits that lead to technical credentials or careers. These courses directly articulate to the state’s community colleges and universities or align with a larger CTE pathway, and often the credits support high school graduation requirements. Learners know exactly how the courses will build toward their college and career goals. In 2011, CCP was established by the state General Assembly, and all other dual enrollment programs were consolidated under this umbrella. Participation has continuously increased since, with 30% of high school learners taking at least one dual enrollment course. Among that 30%, learners take on average seven dual enrollment courses.¹²

A study of 525,000 learners who enrolled in the CTE pathway from 2012 to 2019 found that participation improved learner outcomes as they transitioned from high school to college. CTE pathway learners earned 6 times more college credits in high school than the control group learners (similar learners who did not participate in CCP). The program’s impact on learner populations who are historically underrepresented in postsecondary education is especially pronounced: CTE participants from underrepresented racial/ethnic groups were 10% more likely than similar learners to enroll in North Carolina public colleges. Learners in the CTE pathway program from low-income backgrounds were 11% more likely than their non-CCP peers to enroll in North Carolina public colleges, while CCP learners who are not from low-income backgrounds were only 9% more likely to enroll in state public higher education institutions.
The Indiana Commission for Higher Education and approximately 40 institutions of higher education (80% of the state’s institutions) are leading a statewide effort for dual enrollment. The Indiana Pre-Admissions: Your Path to College program introduces high school learners to college pathways through information sharing and early credit attainment. A major tool for secondary learners to earn college credit is the Indiana College Core. The Indiana College Core is a block of 30 credit hours that transfer among all Indiana public institutions and some private ones. In the 2023-24 school year, 222 high schools and 16 colleges offered the Indiana College Core, an increase of 81 high schools over the prior year. The goal is for this program to stand in at least 500 high schools by 2025. In March 2024, Governor Eric Holcomb signed Senate Bill 8: Higher Education Matters into law after it was passed unanimously in the House and Senate. The bill essentially codifies equitable access to Indiana colleges by requiring all public and private high schools to offer the Indiana College Core in the 2024-25 school year or submit a plan of how they will stand this program up by the 2026-27 school year.

Expanding Intentional Dual Enrollment Requires Federal Policy Support

Realizing the vision and priorities laid out in CHSA’s The Next Phase of Dual Enrollment Policy and maximizing the potential of dual enrollment for all learners will require federal policy and investments to partner with the expanding network of state policies and funding that governs dual enrollment. States that have made investments in dual enrollment are reaching the limit of their funding, but significant challenges still need to be addressed, particularly around expanding access to dual enrollment for underrepresented learners.

Most education initiatives, whether K-12, postsecondary, or workforce, share costs among federal, state, and local sources. But the federal funding options to support dual enrollment are vested in larger formula grant programs authorized by ESSA and the Carl D. Perkins Career and Technical Education Act (Perkins V). This funding structure means that opportunities for transformative initiatives to significantly expand access and ensure intentionality are quite limited given other competing needs and related priorities.
The need for new federal policy to support dual enrollment is not just about funding the costs of course experiences for high school learners. Without clear direction from the federal level about what dual enrollment should look like nationally, states have been working on a divergent set of policies and priorities in the dual enrollment space that has led to a 50-state patchwork of programs, policies, and funding with varying degrees and ways of measuring success.

Federal policy has a significant role to play in setting a national direction for dual enrollment by providing incentives and requirements that push dual enrollment programs toward becoming as structured and equity focused as possible. It can also provide baseline expectations for the deployment of dual enrollment that are more sophisticated than just supporting learners in taking more college courses.

The Biden administration has taken significant steps to conceptualize a national strategy to support dual enrollment’s growth and intentionality. But new policies authorized by Congress are necessary to implement that strategy and ensure that support for dual enrollment programs that provide intentional experiences for learners becomes embedded within the architecture of federal education policy.

EXISTING FEDERAL SUPPORT FOR DUAL ENROLLMENT

For more information on the existing federal policy provisions in ESSA, Perkins V, and the Higher Education Act (HEA), please see the CHSA’s Federal Playbook.
Policy Recommendations

Intentional dual enrollment is an indicator for academic and workforce learner success. Now is the time for federal policymakers to take a leading stance on the role these programs serve in a pathway. As Congress and the U.S. Department of Education (ED) continue to develop proposals and ideas for expanding equitable access to dual enrollment nationwide, they should explore a number of specific federal policy levers to center the development of high-quality dual enrollment experiences that emphasize providing learners with intentional dual enrollment opportunities.

Better meeting the needs of today’s learners and workforce requires reexamining traditional education systems. To make this change, the K-12, higher education, workforce development, and human services systems must be better aligned. Federal policy and action must be deployed to incentivize or enable program leaders to critically consider the classes offered to learners, how those classes align to pathways or programs of study, and what counseling/advising/career navigation learners can access.

The following federal policy recommendations will advance these national priorities across six action areas:

- Raise national expectations
- Improve data collection
- Integrate career navigation
- Fund intentional dual enrollment
- Improve accountability incentives
- Create a pathways ecosystem
ACTION 1: RAISE NATIONAL EXPECTATIONS

ESTABLISH NEW POLICIES AND ACTIVITIES:

+ Update the Federal Definition of Dual Enrollment: The current federal definition for dual or concurrent enrollment is a maximally inclusive definition of all dual enrollment programs. However, since that definition is used to determine eligibility for federal funding, a stronger definition that centers the importance of key program elements is necessary to ensure that learners have intentional dual enrollment experiences, states prioritize a commitment to expanding access to underrepresented learners, and the vision for dual enrollment’s role in learners’ educational journeys is clear. Such a definition would raise the expectations for all dual enrollment programs to think about how they are advancing these core principles and would embed these concepts in any federal funding opportunity that used this definition.

LEVERAGE EXISTING POLICIES:

✓ Enact a National Messaging Campaign on Maximizing the Benefits of Dual Enrollment: With ED at the center, the federal government should begin a national messaging campaign targeted to state leaders, school administrators, teachers, and families about the importance of intentional dual enrollment. The campaign should highlight best practices for thoughtfully adopting program structures, pathways, and programs of study to provide learners with intentional sequences of courses; the importance of high-quality counseling and advising to help learners make course selections; and what it means to be a dual enrollment program that is maximizing the benefits that learners can derive from the experience. Families and learners should also be given clear information about the benefits of dual enrollment in helping learners progress through a pathway in a way that is efficient and affordable and connects to learners’ college and career goals.

✓ Prioritize Intentional Dual Enrollment in Federal Grants: ED should make intentional dual enrollment a priority in agency grants. To increase the availability and accessibility of college in high school opportunities for learners nationwide, ED should include access to early college high schools and dual and concurrent enrollment among its priorities for discretionary grants, with a focus on equitable access to high-quality programs. The priority focus should be on expanding learner access to high-quality postsecondary education during high school, especially for learners experiencing low income and underrepresented learners. For now, the priority should reference the federal definitions of early college high schools and dual and concurrent enrollment included in ESSA. When the federal definition for dual and concurrent enrollment is updated to reflect quality requirements, all associated grants will follow that definition.
ACTION 2: IMPROVE DATA COLLECTION

ESTABLISH NEW POLICIES AND ACTIVITIES:

+ **Report Dual Enrollment Outcomes Data**: Federal dual enrollment data collection should be expanded to include metrics that look at learner success in addition to participation in these programs. National data sets on dual enrollment, such as the Civil Rights Data Collection and the Integrated Postsecondary Education Data System collect data only on dual enrollment access, measuring how many learners are participating in course experiences. Expanding the metrics to include learner success would emphasize the importance of course completion in addition to course participation and provide national data to track progress in learner completions (and what is being completed). These metrics could include data on the number of dual enrollment learners who completed courses and the most popular courses taken by learners at high schools or offered by a postsecondary institution.

LEVERAGE EXISTING POLICIES:

✓ **Align Education Accountability Models**: The federal government should encourage each state to review its ESSA, HEA, Perkins V, and Workforce Innovation and Opportunity Act (WIOA) accountability models to align the definitions, indicators, and data collection procedures that are necessary to implement all statutes. This alignment is especially important for dual enrollment, as these programs blur the lines between the secondary and postsecondary levels. Under ESSA, many states elected to establish a measurement of college and career readiness as a School Quality or Student Success indicator. This indicator often includes the measurement of learners in dual and concurrent enrollment coursework, which may coincide with the Perkins V secondary program quality measure, related to postsecondary credit attainment, that states can select. States should be provided the opportunity to develop thoughtful alignment across their accountability systems and encouraged to think about ways that accountability measures can be enhanced to create incentives for programs to build structured dual enrollment opportunities for learners. This work includes encouraging states to move away from meta-indicators that provide combined data on different college and career readiness opportunities and provide usable data on each separate opportunity.
ACTION 3: INTEGRATE CAREER NAVIGATION

ESTABLISH NEW POLICIES AND ACTIVITIES:

+ Create a Digital Transformation Fund: Congress should establish a digital transformation fund to support states in building strong, unified college and career advising and navigation systems that support learners and workers along their pathway. Such systems should be comprehensive enough to elevate dual enrollment within frameworks for college and career navigation.

LEVERAGE EXISTING POLICIES:

✓ Provide Federal Guidance for Counselors on Dual Enrollment: ED should develop federal guidance specifically for counselors to provide clear, accurate, and culturally relevant information about dual enrollment, working with a diverse set of learners to help them make course selections aligned to their goals for college and career, and fostering in their learners a sense of possibility and the achievability of a good-paying job. Dual enrollment is a highly complex program due to the significant variations in program design and structure. As a result, many counselors struggle with understanding these programs and how best to advise learners about participating in them.

ACTION 4: FUND INTENTIONAL DUAL ENROLLMENT

ESTABLISH NEW POLICIES AND ACTIVITIES:

+ Fund Intentional Dual Enrollment Programs: Congress should create and fund a program that provide states with grants to allow learners the opportunity to earn up to 12 credits of dual enrollment for free and emphasize the use of that funding for dual enrollment programs that are providing learners with intentional and meaningful dual enrollment experiences, similar to President Biden’s College 2 Career proposal.
+ **Expand Pell Grant Eligibility to Dual Enrollment Programs:** Congress should expand Pell access so that learners can earn up to 2 semesters worth of Pell grants for college in high school credits before they begin drawing down from their 12-semester lifetime eligibility so long as these credits are embedded in a wider program of study. This expansion would increase equitable access to dual enrollment programs that are directly connected to a college pathway. The bipartisan [Go to High School, Go to College Act](https://www.congress.gov/bill/116th-congress/house-bill/2385) proposes a high-quality way to accomplish this work.

+ **Create Additional Incentives and Sustainable Funding for States and Institutions of Higher Education (IHEs) to Expand Intentional Dual Enrollment:** Congress should provide new federal support for aligning secondary and postsecondary education—including dual enrollment and early college programs—through a new competitive grant program or incentives within HEA. The [Jumpstart on College Act](https://www.congress.gov/bill/116th-congress/house-bill/2388) outlines how statewide initiatives that advance evidence-based college in high school programs and IHEs can establish new programs or scale existing ones. These programs and proposals (including the [Career-Connected High Schools Grant Program](https://www2.ed.gov/about/offices/list/ocf/grants/)) should include language specifying that states or programs spending the funding must develop structured and intentional programs, use pathways and programs of study, and invest in advising.

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**LEVERAGE EXISTING POLICIES:**

✓ **Ensure That Any Expansion of College Promise Programs Includes Various Postsecondary Opportunities:** A federal-state partnership on free college and learner success should include dual enrollment programs, as well as pre-apprenticeships, youth apprenticeships, Registered Apprenticeships, and paid internships, as eligible programs to ensure that various types of postsecondary learners and postsecondary pathways receive access to the benefit. These federal funds should also be used to carry out the full range of support services learners need to remain financially stable and complete their program of study, including the services proposed in the [Assisting Community Colleges in Educating Skilled Students (ACCESS) to Careers Act](https://www.congress.gov/bill/114th-congress/house-bill/589).

✓ **Adequately Fund the Education Innovation and Research (EIR) Grant Program:** Congress should adequately fund the EIR grant program since it has been instrumental in supporting innovation and the testing of new practices for college in high school programs. For example, the EIR has been [leveraged by state education agencies and intermediaries](https://www.ed改革创新.org/) to test innovations and models in dual enrollment, including combining dual enrollment and work-based learning, combining online dual enrollment with social-emotional learning for learners in rural areas, and implementing dual enrollment to help build up the talent pipeline for the computer science and cybersecurity industries.
ACTION 5: IMPROVE ACCOUNTABILITY INCENTIVES

LEVERAGE EXISTING POLICIES:

✓ Provide Guidance to Improve Program Quality: ED should provide nonregulatory guidance to states to strengthen program quality under Perkins V and the implementation of the legislation’s accountability system, including for dual enrollment. Through the Perkins V state plan states have several levers to create and ensure high-quality CTE programs. Specifically, each state has the opportunity to select from among three secondary CTE program quality indicators including learner attainment of postsecondary credits (implicating dual enrollment). Efforts could be strengthened further through Perkins V implementation by building on the program quality indicator to embed postsecondary credit attainment across all secondary and postsecondary programmatic and quality evaluation structures.

ACTION 6: CREATE A PATHWAYS ECOSYSTEM

ESTABLISH NEW POLICIES AND ACTIVITIES:

+ Align Youth Programs and Investments: The creation of a cabinet-level interagency task force on youth policy would lead to collaboration across similar programs. It would operate for the purpose of aligning federal efforts across all youth-serving programs and finding key solutions for helping young people earn credentials that can lead to careers in fields that pay family-supporting wages. These efforts could include establishing common performance metrics for youth programs, building on performance measures in WIOA. This task force would also be charged with coordinating federal resources that serve overlapping populations to reduce duplication and support braided funding. One important charge for this task force must be intentional dual enrollment, including scope, quality, and access. Collaboration across federal agencies will guarantee that a holistic approach is taken to address learner needs.

+ Develop a National Pathways Strategy: Congress should establish an interagency task force that includes ED, the U.S. Department of Labor, and other federal agencies that interact with the education ecosystem and charge it with creating a cohesive national strategy for pathways to include shared definitions and quality standards. Statute should require that this strategy be periodically updated and communicated to Congress to create sustainability beyond any given administration. College in high school programs, and specifically intentional dual enrollment, will be elevated as part of this strategy.
Looking Ahead

New federal policy, funding, and initiatives are essential to ensure that as dual enrollment continues to grow, it does so with fidelity and a commitment to intentionality and providing learners with the most valuable experiences possible during their college courses in high school. Dual enrollment is popular and growing, but without more federal support it will continue to grow intentionally only in some places and not in others. To realize the promise of serving all learners who want to participate in dual enrollment, regardless of family income, and providing them with course experiences matched to their college and career goals, the federal government has an important role to play in shepherding the growth of dual enrollment and operationalizing the vision laid out in The Next Phase of Dual Enrollment Policy.

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ABOUT ADVANCE CTE

Advance CTE: State Leaders Connecting Learning to Work, first established in 1920, is the longest-standing national nonprofit that represents State CTE Directors and state leaders responsible for secondary, postsecondary, and adult CTE across all 50 states, the District of Columbia, and U.S. territories. www.careertech.org

ABOUT THE COLLEGE IN HIGH SCHOOL ALLIANCE

The College in High School Alliance is a coalition of national, state, and local organizations collaborating to positively impact national and state policies and build broad support for programs that enable high school students to enroll in authentic, affordable college pathways toward postsecondary degrees and credentials offered with appropriate support. www.collegeinhighschool.org

ABOUT JOBS FOR THE FUTURE

Jobs for the Future (JFF) drives transformation of the U.S. education and workforce systems to achieve equitable economic advancement for all. www.jff.org
END NOTES

14 Ibid.