



January 31, 2014

Dr. Brenda Dann-Messier
Assistant Secretary for Vocational and Adult Education
U.S. Department of Education
830 First Street, NE
Washington, DC 20002

Re: Suggested Dual and Concurrent Enrollment Experiments for Federal Student Financial Assistance

Dr. Dann-Messier:

The National Alliance of Concurrent Enrollment Partnerships (NACEP) offers the following suggestions of experiments that would enable students who are also enrolled in high school to access federal student financial assistance for postsecondary courses (dual and concurrent enrollment students):

- **Proposed Experiment 1:** Eligibility for any high school student enrolled in any postsecondary course offered by a Title IV eligible institution.
- **Proposed Experiment 2:** Eligibility for any high school student enrolled in a state-approved program of study that leads to a degree, certificate or general education college transfer pathway offered by a Title IV eligible institution.
- **Proposed Experiment 3:** Eligibility for any high school student enrolled in a concurrent enrollment program offered by a Title IV eligible institution that has demonstrated adherence to state or national standards for academic quality.

As the only national membership-based organization representing concurrent enrollment partnerships, NACEP represents over 260 member colleges and universities, 50 school districts, and ten states collectively engaged in collegial dialogue, program and professional development, research and advocacy. NACEP's national standards represent best practices

that ensure college courses offered in high schools are of the same high quality as courses offered on college campuses, and serve as a model for statewide quality standards in 16 states. NACEP offers the only national peer-review accreditation to distinguish high quality concurrent enrollment programs administered by institutions of higher education.

Background and Need for Experiment

Ineligibility of High School Students Penalizes Those Starting a College Education Early

The National Center for Education Statistics estimates that 1.4 million high school students took over 2 million college courses from postsecondary institutions nationwide in 2010-11 (NCES, 2013). While 70% of postsecondary institutions that offer dual and concurrent enrollment programs charge free or reduced tuition to some or all students; 66% of institutions report that some parents and students contributed toward tuition. Of institutions with a dual enrollment program, 45% reported that most students paid for tuition, 50% for fees, and 60% for books. While many states and most postsecondary institutions subsidize the tuition costs of these programs, many students who would be eligible for Title IV if they had completed high school find themselves ineligible and thus penalized for embarking on their college education early. Public colleges and universities in Indiana, for example, offer identified concurrent enrollment courses taught by college-approved high school instructors for no more than \$25 per credit hour and requires these institutions to offer the courses for free to students eligible for free- and reduced-price lunches. While this pool of students has significant overlap with Title IV-eligible students, there are many Title IV-eligible students who do not qualify for free- and reduced-price lunches. The state has no provision for funding fees and supplies (which can be significant in technical coursework) or books.

Dual and Concurrent Enrollment Helps Students Succeed in College

Research from the National Student Clearinghouse shows that one in six first-time degree-seeking students who entered college in 2007 took at least one dual or concurrent enrollment course while in high school. The Clearinghouse documented that these students are 22% more likely to complete college within six years (NSC, 2013) than students with no prior college experience. The Southern Region Education Board documented that first-time-in-college students across the 10 state region completed Associate's degrees in 2008-09 in an average of 2.9 years if they had taken dual and concurrent enrollment courses while in high school, compared with 4.6 years for students

who did not. Southern students who took college courses in high school spent an average of 4.6 years to earn a Bachelor's degree compared with 5.0 years for those who did not (SREB, 2011). While these studies did not examine the causality of dual and concurrent enrollment on student success, a number of nationwide, statewide and multi-institutional studies have. The latest peer-reviewed study to utilize a quasi-experimental research design known as propensity score matching compared students who took dual and concurrent enrollment with those who did not, accounting for student demographic characteristics and prior academic performance through statistical matching techniques. Using a nationally representative sample of students who began postsecondary education in 2003, the study found that dual and concurrent enrollment participation increases the probability of a student completing a Bachelor's degree by 10%. The benefits were even greater (12%) for students whose parents never attended college (An, 2012).

Proposed Experiments

NACEP has identified a few alternative experiments that extend Title IV eligibility to dual and concurrent enrollment that would enable the Department to evaluate the return on investment and impact of different approaches:

Proposed Experiment 1: Eligibility for any high school student enrolled in any postsecondary course offered by a Title IV eligible institution.

Waivers needed: 20 USC § 1091(a)(1) and 34 CFR 668.32(a)(1)(i), (b), and (e). Waivers would enable students simultaneously enrolled in high school to be eligible for Title IV aid. The Department would also need to waive statutory and regulatory provisions requiring students to be accepted or enrolled in an eligible program, as many institutions consider most dual and concurrent enrollment students as non-degree seeking.

Description: By extending eligibility to all dual and concurrent enrollment students and courses at the participating institutions, this alternative would enable the Department to understand the multitude of trajectories through postsecondary education followed by students today. With 1 in 6 students nationwide completing college courses while still enrolled in high school and even greater numbers in certain states (50% in Iowa), this broad approach would capture the diversity of students enrolled in these programs. It

would enable the Department to develop ways to ensure that states and institutions maintain existing support for dual and concurrent enrollment, so that the federal investment supplements state and institutional investment. In conjunction with the Department, participating institutions would develop Title IV application procedures for such students and adapt institutional policies for satisfactory academic progress and maximum timeframe.

Evaluation: This experiment would enable the Department to evaluate the impact that extending federal financial aid eligibility to students simultaneously enrolled in high school would have on time to degree, completion rates, satisfactory academic progress, and the total cost to students, states, and the federal government.

Proposed Experiment 2: Eligibility for any high school student enrolled in a state-approved program of study that leads to a degree, certificate or general education college transfer pathway offered by a Title IV eligible institution.

Waivers needed: 20 USC § 1091(a)(1) and 34 CFR 668.32(a)(1)(i), (b) and (e). Waivers would enable students simultaneously enrolled in high school to be eligible for Title IV aid. In this proposal, no waiver would be required for the statutory provision requiring students to "be enrolled or accepted for enrollment in a degree, certificate, or other program."

Description: Participating institutions would be required to accept or enroll students in a program of study that leads to a degree, certificate, or general education college transfer pathway. Students who are not accepted or enrolled in degree or eligible certificate programs would need to take courses from state-approved career programs of study or academic transfer programs. By limiting eligibility to dual and concurrent enrollment students who are enrolled in state-approved programs of study leading to degrees or certificates, the Department can focus its investment on courses that are more likely to lead to increased college completion rates, reduced time-to-degree, and reduced total cost of college degrees. The Department can work with states to identify those programs that could be deemed eligible for future revisions to the CFR.

Evaluation: This experiment would enable the Department to study the impact of focusing early course taking on those courses students need for their chosen degree programs. An

evaluation could compare the return on investment with the focused program to that of the broader experiment.

Proposed Experiment 3: Eligibility for any high school student enrolled in a concurrent enrollment program offered by a Title IV eligible institution that has demonstrated adherence to state or national standards for academic quality.

Waivers needed: 20 USC § 1091(a)(1) and 34 CFR 668.32(a)(1)(i), (b) and (e). Waivers would enable students simultaneously enrolled in high school to be eligible for Title IV aid. The Department would also need to waive statutory and regulatory provisions requiring students to be accepted or enrolled in an eligible program, as many institutions consider most concurrent enrollment students as non-degree seeking.

Description: In order to participate, institutions offering college courses taught by high school instructors would need to demonstrate that they adhere to state or national standards for academic quality. While transcribed college credit earned through dual and concurrent enrollment is widely accepted nationwide - 92% of public colleges and universities accept it for required or elective credit (WICHE, 2006), national statistics mask the variation in credit acceptance. Twenty-two states require that public postsecondary institutions accept dual and concurrent enrollment credit in the same fashion as they would any other transcribed credit (ECS, 2013). In states without such policies (Michigan, Virginia) – the flagship, doctoral-granting institutions often use the lack of quality or standards as an excuse to impose added restrictions, as do many private institutions. This pilot would limit participation to concurrent enrollment programs that have received state approval or undergone a program review to demonstrate adherence to state quality standards or have obtained national accreditation. Forty-two states have adopted policy related to the quality of postsecondary courses offered for dual and concurrent enrollment (HLC, 2013). The most common relate to instructor eligibility and selection, course rigor, and transcripting requirements. The standards vary across the states, but a common intent lies behind these standards – to ensure widespread credit acceptance, college courses offered to high school students must be of the same high quality and rigor as the courses offered to matriculated college students. As the only national set of standards of excellence for concurrent enrollment partnerships, NACEP's standards serve as a model for statewide quality standards in 16 states. Because many

students matriculate to different institutions from the ones they earned concurrent enrollment credit from, this experiment would enable the Department to focus its investment on highly portable and transferable credits.

Evaluation: This experiment would enable the Department to study the transfer and portability of credits earned through concurrent enrollment. An evaluation could determine the extent to which students are successfully transferring credit across multiple institutions and utilizing those credits to increase their odds of degree attainment and reduce the time to earning a degree.

Conclusion

These three experiments would provide the Department with valuable experience and knowledge about the intricacies of extending federal financial aid to students simultaneously enrolled in high school. With ever increasing numbers of students participating in dual and concurrent enrollment, these experiments would yield valuable information on the policies necessary to adapt Title IV funding to these programs and the impact of those policies on student success and reducing the cost of higher education.

Thank you for your consideration of these suggestions. Please feel free to contact me I can be of any assistance.

Yours truly,



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