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At-a-Glance

KEY ISSUE

Dozens of Early College High Schools are managing to develop the partnerships, curricula and schedules necessary to offer college credits to high school students. In just a few short years, nearly all of the Early College High Schools had students enrolled in at least one college course.

Primary Findings

- Early College High Schools enrolled students who are representative of populations traditionally underserved in higher education.
- One of the key measures that can be used to gauge the effects of Early College High Schools at this early stage of development is high attendance rates.

Findings From the Early College High School Initiative: A Look at Best Practices and Lessons Learned Regarding a Dual Enrollment Program

Prepared by the National High School Center'

INTRODUCTION

Dual high school and college enrollment programs are being adopted as a way to redefine and increase rigorous coursework in high schools, as well as to keep students engaged, on track to graduate, and better positioned to succeed in college.

Currently, too many high school students continue to be unprepared for college, causing policymakers to seek strategies for ensuring high school students are better able to succeed at the postsecondary level. States are increasingly turning to dual enrollment as a strategy to accelerate learning and to help bridge the transition after graduation (Russell, 2005).

Although little definitive research exists on the overall impact dual enrollment has on student achievement, some lessons learned are available regarding some of the most popular approaches to dual enrollment, such as the Early College High School Initiative (ECHSI), a dual enrollment program developed by the Bill & Melinda Gates Foundation.

Although the following look at best practices and lessons learned was gleaned from an evaluation specific to the Early College High School Initiative (ECHSI), entitled "Early College High School Initiative 2003–2005 Evaluation Report," the findings help inform those interested in developing or implementing dual enrollment programs more generally.

THE CHALLENGE

Barely 60 percent of first-time, full-time, degree-seeking college freshmen graduate within six years. The first year of college is the most critical to degree completion; 25 percent of these students drop out during the freshman year alone (Carey, 2004).

Graduation rates are particularly low for minority and low-income students. Low-income students are far less likely to earn a baccalaureate degree than are students from the highest socio-economic level (Advisory Committee on Student Financial Assistance, 2002).

TAKE-AWAYS

State Level

- Reaching underserved populations requires that states resolve the issue of funding of dual enrollment without placing a financial burden on students. In North Carolina and Michigan, for example, high schools and colleges share the cost of dually enrolled students (Karp et al., 2004). Where possible, institutions of higher education should be given reimbursements or incentives to help support dual enrollment programs.
- States should establish student participation goals and track improvement toward meeting these goals.
- Program structure, student admissions and program financing are some of the priority areas for which states should consider developing governing policies to ensure that high-quality, accessible dual enrollment programs are part of comprehensive statewide systems.
- Additional research is needed to ascertain long-term impacts of dual enrollment. More research and statewide data collection across a variety of dual enrollment programs would also be useful to more optimally inform and improve practices related to funding arrangements, both for guidance regarding course articulation and offerings and for approaches to instruction and criteria for student eligibility.

THE CONTEXT

In the past, the opportunity to take college courses while still in high school was mainly offered to those students who already excelled beyond their grade level. However, education reform leaders are now looking at ways to reach out to a wider pool of students who can benefit from college coursework and, in the process, to decrease the amount of remediation that needs to be offered at the college level (Karp, Bailey, Hughes, & Fermin, 2004).

KEY INTERVENTIONS

The ECHSI focuses specifically on providing students a rigorous curriculum by blending high school and college education. The high schools that are part of this initiative, called ECHSs, are designed to provide students with a high school diploma while they also earn credits toward a postsecondary degree — either an associate's degree or two years of credits toward a bachelor's degree — at public expense. ECHSs make college credits available by partnering with local institutions of higher education, including public and private four-year colleges and universities as well as public community colleges.

By fall 2006, 128 ECHSs had opened under the ECHSI, serving more than 15,000 students, and more than 175 schools are scheduled to open by 2008. With small enrollments of no more than 400 students, ECHSs are designed to provide students close, personal relationships with their instructors and other faculty, facilitating better academic progress. The schools target populations that have largely been underrepresented in college preparatory work — low-income students, those students who are first in their families to attend college, those in the process of learning English, and students of color.

Through the ECHSI, the Bill & Melinda Gates Foundation hopes to improve the college attendance and completion rates among these groups. If ECHSs are successful, not only will these students be able to jumpstart their college careers, they will also eliminate the costs of up to two years of college tuition.

Since 2002, the American Institutes for Research® (AIR) and SRI International have been conducting a national evaluation of the ECHSI. This brief includes findings based on qualitative and quantitative data collected in 2003–04 and 2004–05. The evaluation team gathered qualitative data (e.g., interviews, focus groups and observations) from a sample of the ECHSs, the 13 foundation partners (called intermediaries) that broker and oversee the relationships between the various local partners, and Jobs for the Future (JFF) — the organization that coordinates



KEY INTERVENTIONS (CONTINUED)

and oversees the initiative. Quantitative data were also collected through a survey that was sent to each ECHS and included topics such as student demographic characteristics and students' college course-taking opportunities.

The Bill & Melinda Gates Foundation established a set of attributes, or Core Principles, required of all ECHSs (Jobs for the Future, 2002). At each ECHS:

- Students earn up to an associate's degree or two years of credit toward the baccalaureate while in high school.
- Mastery and competence are rewarded with enrollment in college-level courses.
- The years to a postsecondary degree are compressed.
- The middle grades are included, or there is outreach to middle-grade students, to promote academic preparation and awareness of the ECHS option.

ECHSs have experienced both accomplishments and barriers in implementing key features of the initiative.

FINDINGS AND CHALLENGES

Reaching Students Underrepresented in Postsecondary Education

Enrolling a population of students underserved in postsecondary education is a primary goal of the ECHSI.

FINDINGS

- ECHSs recruited and enrolled low-income students. Recruiting strategies such as media advertising, mailings, school fairs and counselor referrals worked to reach low-income students, and about three-quarters of schools had more qualified applicants than available space.
- ECHSs enrolled students who are representative of populations traditionally underserved in higher education. On average, the ECHSs had 6 percent more minority students than expected, given the demographics of their feeder district(s) and the proportions of students qualifying for the free and reduced-price lunch program that mirrored the district profile.

CHALLENGES

- ECHSs are not serving English language learners or students with Individualized Education Programs in proportion to their numbers in the districts.
- Because some targeted students may not have the necessary skill level to commence or complete the demanding curriculum, some ECHSs have imposed minimum achievement requirements for entrance. In the future, some sampled schools are considering raising entrance standards and altering admission policies through measures such as more comprehensive screening processes or placement tests.
- After two years of experience (and only one year for many ECHSs), ECHSs are realizing that middle school outreach is critical to improving the academic and social preparation of incoming students. In 2004–05, more sites discussed current or planned bridge programs than in previous years, although concrete plans for relevant professional development and other supports at the middle school level were not in evidence.

FINDINGS AND CHALLENGES (CONTINUED)

Implementation of College Experience

Despite the initiative being relatively young, significant strides have been made in the implementation of the college component of the ECHS experience, as evidenced by the fact that the vast majority of ECHSs had at least some of their students enrolled in college courses in 2004–05.

FINDINGS

- ECHSs offered college courses in one of four ways: (a) college courses on their high school campus; (b) college courses with only ECHS students on the college campus; (c) a cohort of ECHS students taking college classes on a college campus with both high school and college students; and (d) an individual student attending college courses with college students on the college campus."
- ECHSs took varying approaches to developing course sequences and curriculum plans, as well as to developing structures to support student success in college. The better-prepared ECHSs collaborated with their college partners to develop detailed curriculum plans covering all school years. Schools demonstrated varying degrees of preparedness for the challenge of supporting ECHS students in college courses.
- Although few colleges offer formal structures to increase personalization (such as "houses" or advisories), most college faculty expressed an interest in communicating care and concern to their ECHS students. Additionally, many ECHSs featured a college support class designed to teach skills necessary for college success and introduce students to the new expectations of college environments.
- Most schools have successfully created a college-going culture, as nearly every student interviewed reported plans to attend college after finishing at the ECHS.
- Individuals from various partner groups across the initiative cited examples of students meeting and even exceeding expectations in college classes. Students attending college classes were proud of their accomplishments, citing their successes on challenging exams and assignments and their progress in accumulating credits.

CHALLENGES

- Determining exactly how students might be able to acquire a full 60 college credits was sometimes problematic. Schools that successfully addressed this challenge worked with their higher education partners to identify courses that would count toward the high school diploma and qualify for college credit.
- Although some enrolled students were able to meet college entrance and placement requirements, schools found that some students were unable to pass these exams. One response to this problem was to enroll these students in development courses designed to prepare them for higher-level courses; these courses have the benefit of providing additional academic preparation but may not provide college credit.
- Although site visitors observed some examples of engaging, rigorous instruction that offered students the opportunity to construct knowledge, connect new information to existing knowledge, or explore and defend ideas, instruction observed in college classes was primarily teacher-centered in its approach and delivery. However, many of the initiative's leaders believed that instruction should be engaging and active, even at the college level.
- Some instructors at partner colleges struggled to determine appropriate expectations for ECHS students in college classes. The evaluation team found, however, that college instructors who taught ECHS students alongside other college students were more likely to hold their ECHS students to the same standard as their other college students than those instructors who taught ECHS students alone.



FINDINGS AND CHALLENGES (CONTINUED)

Ensuring Rigorous and Relevant Instruction

One of the goals of the initiative is to ensure rigorous instruction that requires students to build on existing knowledge and skills to create or explore new ideas; demonstrate conceptual understanding of important content; organize, interpret, evaluate and synthesize information; communicate clearly and well; and revise work based on informative feedback. Relevant instruction requires students to address questions or problems with real-world applications; make choices about what they will study and how they will study it; and take on plausible writing roles and submit their work to real audiences.

FINDINGS

- Across ECHSs, classroom observation and interview data indicated that teachers attempted—to varying degrees—to use rigorous and relevant instructional strategies to prepare students for academic success in college.
- English and language arts classes exhibited more rigorous instruction than observed math courses.
- Some ECHSs provided opportunities for students to choose what they might study, to connect classroom learning to the outside world, and to serve in internships.
- The prevailing opinion from students was that their classes were challenging, but not too challenging.

CHALLENGES

- In math classes, students were directed to concentrate on basic computation or memorization.
- Instructors at both the high school and college level need help in offering more rigorous and relevant instruction. It appears that college instructors are more likely to adapt their classroom strategies (and perhaps reduce the rigor of a syllabus) if they are teaching a class composed solely of ECHS students.
- Recognizing that many students struggle with academically challenging courses, schools developed a variety of classes to shore up the skill level of students. Eighty-eight percent of ECHSs offered support courses to ease the transition to college.
- ECHSs serve students with a wide variety of skill levels, which can make it difficult for staff to maintain high expectations for all students. Interviewed teachers found it challenging to strike a balance between teaching with high expectations and meeting students at their levels.

Establishing Personalized Learning Communities

Students and teachers felt that they had closer and more personal relationships, which can be conducive to enhanced learning, than they had at other schools.

FINDINGS

• A personalized learning environment contributed to a climate in which students wanted to attend high school. Survey results indicated that the mean average daily attendance for all ECHSs was high. Average daily attendance rates for 22 schools in 2003–04 was 91 percent.

CHALLENGES

• Although ample evidence showed strong personalized relationships between ECHS students and teachers, there was very little evidence of personalized or individualized learning plans in sampled ECHSs.

FINDINGS AND CHALLENGES (CONTINUED)

Program Leadership and Decision-Making

Each ECHS has a unique environment and set of tensions and relationships within which it has to operate. The parameters affecting the structure and nature of each ECHS include the relationships between the ECHS and various partners, shared decision-making between partners and teaching staff (including academic planning decisions), financial and material resources (including concerns about sustainability), staffing capacity, and professional community and development.

FINDINGS

- A strong relationship with a shared power balance between the ECHS and its partner college is important to the overall success of each ECHS.
- Beyond the college, other partners such as governing or advisory boards often play a role in developing ECHSs. The most common constituency groups on the boards were ECHS and college administrators, ECHS instructors and district representatives.
- Districts play a key role in the success of many ECHSs, acting as funders, service providers, or policy advisors or merely providing the local policy context.
- Qualified and appropriate staff members are at the heart of any successful school, and ECHSs are no different. Teachers often relied on their professional community for support. Common planning time for those teaching at the high school as well as college level was frequently noted by teachers at sampled ECHSs either for its usefulness (when present) or its necessity (when absent).

CHALLENGES

- Although most partners at sampled ECHSs agreed on the vision of each ECHS, sometimes tension concerning how to implement the vision arose.
- Districts served as active and vital supports in some cases and as barriers in others at the sampled ECHS sites.
- For some ECHSs, being able to find instructors who could teach college-level courses and assist with administration or activity planning, as well as take on the new role of advisor for students, was a challenge.
- Some of the sampled first-year ECHSs, with small enrollments, struggled with only the support of a part-time (and sometimes offsite) administrator.
- Although collaboration among ECHS and college instructors occurred at some ECHSs, at others the collaboration was hindered by obstacles such as time constraints or disparity in the perceived value of the relationship.



CONCLUSION

Among policymakers, there is growing interest in programs such as the ECHSI that are designed to accelerate learning for historically underserved students. With the increasing cost of higher education, the promise of earning college credits in high school is particularly appreciated by parents.

Numerous lessons learned from the evaluation of the ECHSI can be applied to similar dual enrollment efforts by states across the country.

Adequate funding remains an issue critical to the long-term sustainability of early college high schools. At some ECHSs, the dollar amount for purchasing textbooks was not adequate, and funds needed to be raised to supplement these costs. Resolving the long-term resource issue remains the top priority on the minds of ECHSI leaders, and advocating for friendly dual-enrollment policies at various levels of government clearly will be needed for some time if the option of taking college-level courses is available to an increasing number of students.

END NOTES

- This brief was adapted from the complete evaluation report that can be found at http://www.gatesfoundation.org/nr/downloads/ed/researchevaluation/ECHS_Eva_Synthesis_Report_2003-2005.pdf
- ^a The ECHSs are administered by intermediaries who select participating high schools and institutions of higher education. Although ECHSs do not generally include an online learning feature, distance learning is often included in other dual enrollment programs as a strategy to reach rural learners in particular. One challenge associated with this approach is the availability of computer and Internet access at low-income schools.

REFERENCES

- Advisory Committee on Student Financial Assistance. (2002). *Empty promises.* Retrieved January 19, 2007, from http://www.ed.gov/about/bdscomm/list/acsfa/emptypromises.pdf
- Carey, K. (2004). A matter of degrees: Improving graduation rates in four-year colleges and universities. The Education Trust. Retrieved January 16, 2007, from http://www2.edtrust.org/NR/rdonlyres/11B4283F-104E-4511-B0CA-1D3023231157/0/highered.pdf
- Jobs for the Future. (2002). *Early college high schools: Core principles.* Retrieved January 16, 2007, from http://www.earlycolleges.org/Downloads/CorePrinciples.pdf
- Jobs for the Future. (2006). Dual enrollment in Rhode Island: Opportunities for state policy: Report to the Statewide PK-16 Council by Jobs for the Future. Retrieved March 12, 2007, from http://www.ribghe.org/dualenrollment06.pdf
- Karp, M. M., Bailey, T. R., Hughes, K. L., & Fermin, B. A. (2004). State dual enrollment policies: Addressing access and quality. U.S. Department of Education: Office of Vocational and Adult Education. Retrieved January 16, 2007, from http://eric.ed.gov/ERICDocs/data/ericdocs2/content_storage_01/0000000b/80/2b/b4/c9.pdf
- Russell, A. (2005). Preparing students for success in colleges and universities. American Association of State Colleges and Universities. Retrieved March 9, 2007, from http://www.aascu.org/policy_matters/pdf/v2n2.pdf

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ADDITIONAL RESOURCES

Add and Subtract: Dual Enrollment as a State Strategy to Increase Postsecondary Success for Underrepresented Students

This 2005 policy primer for states by Nancy Hoffman (published by Jobs for the Future) provides an overview of dual enrollment and a rationale for its expansion and guidelines (including funding models) for states wishing to implement dual enrollment for a wider range of students. Brief case studies highlight substantial dual enrollment programs that serve a wide range of students and offer lessons for an expanded mission for dual enrollment. Add and Subtract is one of a series of Double the Numbers publications from Jobs for the Future. Double the Numbers, a Jobs for the Future initiative, is designed to deepen support for state and federal policies that can dramatically increase the number of low-income young people who enter and complete postsecondary education. (Retrieved March 13, 2007, from http://www.jff.org/JFF_KC_Pages.php?WhichLevel=1&lv1_id=4&lv2_id=0&KC_M_ID=60)

Dual Credit and Exam-Based Courses in U.S. Public High Schools: 2002-03

This National Center for Educational Statistics (NCES) report presents baseline data on the prevalence and characteristics of dual credit and exam-based courses, including Advanced Placement (AP) and International Baccalaureate (IB) courses, in public high schools (Retrieved March 13, 2007, from http://nces.ed.gov/pubsearch/pubsinfo.asp? pubid=2005009). Another NCES report, Dual Enrollment of High School Students at Postsecondary Institutions: 2002-03, provides information on the participation in college-level courses and the earning of college credits by high school students. (Retrieved March 13, 2007, from http://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2005008)

Dual Enrollment: Policy Issues Confronting State Policymakers

A 2006 Education Commission of the States Policy Brief by Carl Krueger features different approaches states have taken to implementing dual enrollment programs, highlighting examples from Florida, Minnesota and other states. (Retrieved March 13, 2007, from http://www.ecs.org/clearinghouse/67/87/6787.pdf)

Integrating Grades 9 Through 14: State Policies to Support and Sustain Early College High Schools

This 2005 brief by Nancy Hoffman and Joel Vargas (published by Jobs for the Future) recommends state policies that would support these new schools, drawing on lessons learned through the ECHSI. It also points to broader policy changes that would advance the agenda of creating a seamless K–16 system that promotes smooth transitions from one education level to the next. (Retrieved January 12, 2007, from http://www.earlycolleges.org/Downloads/Integrating9to14.pdf)

The Link Between High School Reform and College Access and Success for Low-Income and Minority Youth

The 2005 report by Monica Martinez and Shayna Kloppott (published by American Youth Policy Forum and Pathways to College Network) examines the predictors of college-going behavior and how they have been addressed within the school reform movement. It includes a focus on how schools provide students with opportunities to earn college credit. (Retrieved March 13, 2007, from

http://www.aypf.org/publications/HSReformCollegeAccessandSuccess.pdf)

Postsecondary Achievement of CTE Students in Dual Enrollment—An Analysis of Two States

The Community College Research Center (CCRC) is using student record data from the State of Florida and from the City University of New York (CUNY) system to investigate the persistence of dual enrollment students in postsecondary education compared to similar peers who do not participate in dual enrollment. CCRC will also investigate the impact of dual enrollment for career and technical education (CTE) students as compared to their CTE peers who do not participate in dual enrollment, enabling researchers to evaluate whether this strategy can encourage such students to obtain a postsecondary credential. This study is one of the first to use large-scale datasets to investi-



ADDITIONAL RESOURCES (CONTINUED)

gate the impact of dual enrollment on students' postsecondary outcomes, and the first to investigate the impact of dual enrollment for CTE students. Preliminary results from New York City are encouraging. Students from 19 vocational high schools who subsequently enrolled in a CUNY college, and who took at least one College Now course while in high school, were more likely to obtain positive outcomes than their classmates who enrolled in CUNY but did not participate in College Now. This project is funded by the National Research Center for Career and Technical Education, U.S. Department of Education, Office of Vocational and Adult Education. (Forthcoming. Retrieved March 13, 2007, from http://ccrc.tc.columbia.edu/Collection.asp?cid=39)

Promoting College Access and Success: A Review of Credit-Based Transition Programs

This 2003 report by Tomas Bailey and Melinda Mechur Karp for The Community College Research Center (CCRC) provides a general description of the various credit-based transition programs and presents information on what is known about their ability to increase college access for a wide range of students. (Retrieved March 13, 2007, from http://www.ed.gov/about/offices/list/ovae/pi/cclo/crdbase.doc)

Smoothing the Path: Changing State Policies to Support Early College High Schools. Case Studies from Georgia, Ohio, Texas, and Utah

"Smoothing the Path," a 2006 publication from the ECHSI, describes successful state-level strategies and policy lessons learned in four states during the development of schools that integrate secondary and postsecondary education. (Retrieved January 12, 2007, from http://www.earlycolleges.org/Downloads/smoothingpath.pdf)

State Dual Enrollment Policies: Addressing Access and Quality

This 2004 report authored by Melinda Mechur Karp, Thomas R. Bailey, Katherine L. Hughes and Baranda J. Fermin (in conjunction with the U.S. Department of Education, Office of Vocational and Adult Education), explores state sponsorship and regulation of dual enrollment programs by analyzing and summarizing dual enrollment legislation in all 50 states. It also examines the implications of state policy for individual programs and students, and the ways that policies can promote or inhibit the spread of dual enrollment programs. Finally, given current interest in expanding dual enrollment access to students beyond the most academically advanced, this report asks the questions of how—and whether—state policies can encourage access to dual enrollment programs for a broader range of students, particularly middle- and low-achieving students. (Retrieved March 9, 2007, from http://www.ed.gov/about/offices/list/ovae/pi/cclo/cbtrans/statedualenrollment04.doc)

Tracking Student Progress After Concurrent Enrollment (CE)

A 2006 presentation by Patricia Goedecke for a National Alliance of Concurrent Enrollment Partnerships (NACEP) conference outlines key questions and data sources that researchers and oversight agencies should consider when assessing concurrent enrollment patterns. (Retrieved March 13, 2007, from http://www.nacep.org/confdownloads/nacep06_01.ppt)

Return on Investment in Early College High Schools

This financial analysis model, developed by Augenblick, Palaich and Associates, Inc., was commissioned in 2006 by Jobs for the Future to calculate the return on investment for ECHSs. (Retrieved January 12, 2007, from: http://www.earlycolleges.org/Downloads/APA%20ECHS%20ROI%20071906.pdf)

ADDITIONAL RESOURCES (CONTINUED)

Update to State Dual Enrollment Policies: Addressing Access and Quality

This updated (2005) document from Katherine L. Hughes, Melinda Mechur Karp, Baranda Fermin and Thomas R. Bailey (in conjunction with the U.S. Department of Education, Office of Vocational and Adult Education) provides new and additional explanatory information on the dual enrollment policies highlighted in the 2004 report, "State Dual Enrollment Policies: Addressing Access and Quality." The update was generated based on ongoing work for the Accelerating Student Success project funded by the U.S. Department of Education, Office of Vocational and Adult Education. One of the major goals of the project is the identification of state-level policies that support or inhibit the development and implementation of credit-based transition programs. (Retrieved March 13, 2007, from http://ccrc.tc.columbia.edu/Publication.asp?UID=294)

What Is the Cost of Planning and Implementing Early College High School?

On behalf of the Finance Working Group of the ECHSI, Jobs for the Future's Michael Webb undertook to determine the costs of planning and implementing these new institutions spanning high school to college in this 2004 report. (Retrieved January 12, 2007, from: http://www.earlycolleges.org/Downloads/FinanceReport.pdf)

EXAMPLES OF STATE PROGRAMS

Washington

Washington State's dual enrollment program, Running Start, offers students a more comprehensive college experience that, in many ways, replaces the final years of high school. Running Start courses are offered on community college campuses and students generally take their full course load through the program. (Available via the Web: http://www.k12.wa.us/RunningStart/default.aspx)

Minnesota

Minnesota was the first state to develop a dual enrollment program, Post-Secondary Enrollment Options Program. The state's comprehensive policy mandates that schools provide students with dual enrollment opportunities. (Available via the Web: http://www.mnscu.edu/students/specialprograms/pseo.html)

Dual/Concurrent Enrollment Database

This resource provides information on each state's program in the following areas: description of state policies and rationale; party responsible for payment of tuition/fees; source of credit received; and advantages, disadvantages, and unique characteristics of each program. (Use Dual/Concurrent Enrollment from the dropdown menu and go to What States Are Doing. Available via the Web: http://www.ecs.org/ecsmain.asp?page=/html/issuesPS.asp)



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