SUPPLY, DEMAND, AND QUALITY

DUAL ENROLLMENT AND TEACHER CREDENTIALING IN THE GREAT LAKES REGION

PREPARED BY

Michael Deuser
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Funded by the Joyce Foundation, the Great Lakes College and Career Pathways Partnership supports four Great Lakes communities in building high-quality college and career pathways that equip students—particularly historically marginalized students or underrepresented groups—to thrive in college, career, and beyond. GLCCPP works with school districts, postsecondary institutions, and employers across: Columbus, Ohio; Madison, Wisconsin; Northwest Suburbs of Chicago, Illinois; and, Rockford, Illinois.

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DUAL ENROLLMENT OVERVIEW

“Dual enrollment,” “concurrent enrollment,” or “dual credit”—all three terms are used confusingly—are labels for policies that allow students to earn college credit for college coursework taken during high school. Dual enrollment is an umbrella term that includes both concurrent enrollment and dual credit options. Both accelerate students toward graduation by replacing high school requirements with college courses. In Illinois, the term dual enrollment is used when the student is enrolled at high school but may take one or more courses at the college, which may not be used for high school credit. “Concurrent enrollment” is the term most frequently used for programs in which high school teachers are credentialed as adjuncts to teach college courses during the day at their schools. Less frequently, high school students are enrolled in classes on a college campus integrated with college students. This option is most often labeled “dual credit.”

Dual enrollment opportunities have grown dramatically across the United States since the beginning of the 21st century as increasing numbers of high school teachers are credentialed to provide college courses to their students. In 2002, the Bill and Melinda Gates Foundation launched the Early College High School Initiative and helped catalyze the nationwide expansion of dual enrollment. This initiative changed dual enrollment from a small advancement opportunity for students who had finished high school requirements before the end of 12th grade to a strategy to introduce college course taking to students who might not otherwise experience postsecondary education.1

A growing body of evidence that dual enrollment can significantly improve students’ educational achievement and attainment has helped sustain and accelerate this expansion.2 Between 2002 and 2010, the number of high school students taking dual enrollment courses doubled to roughly two million; by 2016, 47 of 50 states (and the District of Columbia) had adopted a statewide dual enrollment policy.3 Dual enrollment is particularly effective when high schools prepare students for a sequence of college credit courses so that students enter postsecondary with a year or more of credit already completed in a career area or major of interest.4

In some quarters—especially among stakeholders in higher education—this rapid expansion has generated concern about quality. Are credentialed high school teachers providing coursework that is equivalent to that taught on the college campus by a professor? In Texas, where the growth of dual enrollment has been especially explosive, the state’s commissioner of higher education noted in 2016, “I get concerned when I see that huge numbers of students are taking dual-credit courses and those numbers aren’t consistent with the data that we have on college readiness.”5 Policy makers and educators in other states have echoed this concern. The state-by-
state policy analysis that follows explores key themes related to offering dual enrollment effectively and at scale: teacher credentialing standards, systems for monitoring quality of the courses taught, and how to fund growing demand.

The Dual Enrollment Triangle

Against this backdrop, states and local communities nationwide are working iteratively to balance the three elements of the dual enrollment triangle: quality, supply, and demand.
Quality refers to how “good” or rigorous dual enrollment coursework is when taught by high school teachers, the primary expansion strategy. In theory, quality is based on dimensions that are largely subjective, including depth and rigor of content, pedagogical skill, student learning outcomes, and applicability to credentials and careers. In practice, key institutions have defined quality primarily as equivalence between “traditional” college courses—taught by college professors, on college campuses, to students who have already graduated from high school—and their dual enrollment analogues. (When high school students are integrated into on-campus college classes and thus receive the same quality of teaching and evaluation as any students, the concerns about quality do not apply.) Supply refers to the availability and accessibility of dual enrollment coursework—how many teachers are qualified to teach college courses, how many college courses are offered to high school students, and how many students are eligible and able to enroll in them. Demand refers to the extent to which key local stakeholder groups—most importantly students and families—want dual enrollment coursework and view it favorably, especially in comparison to alternative or competitor programs like Advanced Placement (AP) and International Baccalaureate (IB).

The three elements of the dual enrollment triangle interact with one another in important ways. If demand for dual enrollment is strong, it is likely that the supply of dual enrollment coursework will increase. Supply and quality can be in tension with one another. Communities that offer an increasingly large supply of dual enrollment courses may struggle to maintain quality as they work to increase the pool of high school faculty credentialed to teach college courses. And fearing a decline in quality that comes with expansion, state policy makers or higher education institutions that credential high school teachers may tighten their requirements. Consequently, to increase both the supply and quality of dual enrollment coursework simultaneously, communities must accept the need to invest in expanding and preparing the credentialed teaching force, a major cost and drain on resources and time.

When all three of these elements are fully developed and in balance, it creates the proper conditions to allow local dual enrollment ecosystems to grow and thrive. It is also important for policymakers and practitioners to recognize that changing any one element of the dual enrollment triangle will likely depend on and influence both of its other elements; intentional balancing is essential.

THE GREAT LAKES COLLEGE AND CAREER PARTNERSHIP

As demand for dual enrollment expands, almost every state in the U.S. faces the challenge of preparing and credentialing teachers. This report offers strategies to increase the supply of dual
enrollment coursework, focusing on the four Midwestern regions that participate in the Great Lakes College and Career Pathways Partnership: Madison, Wisconsin; Columbus, Ohio; Rockford, Illinois; and the Northwest Suburbs of Chicago, Illinois (Northwest Suburbs). The GLCCPP communities represent a microcosm of the nation as a whole in their ambition and ongoing work to increase dual enrollment access with excellence. The challenges they are facing and the lessons they are learning are valuable not only within the Great Lakes region and the Greater Midwest, but across the United States.

Since 2015, the Joyce Foundation has supported cross-sector coalitions in each of these communities, which joined with three leading national technical assistance providers to form GLCCPP. To reach toward GLCCPP’s overarching goal of “building high-quality college and career pathways that equip students to thrive in college, careers, and beyond,” each community is working to create career pathways that span grades 9 through 14. Effective pathways depend on dual credit coursework, but require that each student take a sequence of courses that lead to a credential necessary to begin a career in the regional labor market rather than simply getting credit for one or two random college courses. To design effective course sequences in each Great Lakes region, JFF analyzed local labor markets to identify the “best bet” pathways.

The challenge addressed in this report is to identify, prepare, credential, and pay for the teaching force needed to offer these course sequences. The answer varies by community and requires local stakeholders to navigate a complex web of law, policy, and practice that multiple institutions across state, regional, and local levels help weave. The recommendations in this report apply not only to each community, but to any community that wants to expand dual enrollment quickly as well as for the long term.

THE U.S. MIDWEST’S REGIONAL DUAL ENROLLMENT ECOSYSTEM

Strategically scaling dual enrollment requires a strong understanding of the major public and private institutions that shape policy in a particular place. The Higher Learning Commission (HLC) and the Midwest Higher Education Compact (MHEC) are the two most important of these institutions in the Great Lakes region. While not technically a policy-making institution, the National Alliance of Concurrent Enrollment Partnerships (NACEP) also influences dual enrollment in the Midwest—and beyond.
Higher Learning Commission

Because of the accrediting power the U.S. Department of Education vests in it, the private Higher Learning Commission has at least as much influence on dual enrollment as any public agency. HLC accredits colleges in 19 states, including the GLCCPP states of Illinois, Ohio, and Wisconsin. It is the largest of six accreditors that the U.S. Department of Education recognizes nationwide to ensure that postsecondary institutions meet acceptable levels of quality. Colleges must be accredited in order for their students to receive federal student aid; state funding also generally requires accreditation. This makes compliance with HLC guidelines a critical necessity for higher education institutions, particularly those that depend on public funds.

While authorized by the USDOE, HLC itself determines accreditation guidelines. Recognizing that dual enrollment programs were growing “exponentially” without clear quality controls, in June 2015 HLC clarified that all faculty “who deliver college-level content”—including high school instructors who teach dual credit courses—hold a master’s degree or higher in the “discipline or subfield” they teach, or a master’s degree in any field plus 18 graduate-level credit hours in a course-relevant discipline or subfield.

Although HLC framed this as a mere clarification of “longstanding expectations,” some deemed it a considerable change. An administrator from Wayne State College in Nebraska said, “There’s always been a faculty qualification rule [ . . . ] stating that you have to have a degree above what you teach [ . . . but] narrowing it down to having 18 credit hours or tested experience [in a specific content area] is a new addition.” Many colleges had previously allowed high school instructors who held master’s degrees in education to teach dual enrollment courses. Under HLC’s updated guidelines, this no longer passed muster. Consequently, states, colleges, and K-12 districts “suddenly found themselves with a significant proportion of their dual enrollment teaching force that was under-credentialed.”

To ease the resulting transition, HLC gave all of its members until September 1, 2017 to comply. Some states, like Illinois and Ohio, already had similar standards in place, making the transition easier, at least in theory. Other states, like Indiana and Minnesota, and even individual institutions, like Madison Area Technical College, requested and received additional extensions until September 2022. Notably, this extension applied not only to high school teachers who were already teaching dual enrollment courses when the waiver was given, but also to those who were qualified but not teaching in the specific semester.

Nevertheless, HLC’s credentialing requirements remain a significant obstacle to scaling dual enrollment. HLC does provide some flexibility for institutions to approve teachers of career and technical education (CTE) courses based on “equivalent experience”; however, it does not allow
any flexibility for teachers of general education or other “non-occupational” courses. Nothing prevents the HLC from introducing such flexibility if it so wished. In fact, the South’s regional equivalent to HLC, the Southern Association of Colleges and Schools Commission on Colleges, “more explicitly affords institutions some flexibility in complying with the faculty credential guidelines.” This provides an institution with the ability to “make its case” for why [a] faculty member is qualified to teach dual enrollment courses based on credentials alone, on credentials plus “other” qualifications, or only on “other” qualifications. The Recommendations section of this report offers additional strategies to increase flexibility.

**Midwest Higher Education Compact**

The MHEC began in 1991 with a goal “to advance higher education through interstate cooperation” among Midwestern states. MHEC has 12 member states, including Illinois, Ohio, and Wisconsin. It supports greater research, access, and choice in high education, leveraging regional collaboration to help member states “achieve outcomes that could not be realized by institutions and systems acting independently.”

The MHEC is a major proponent of dual enrollment. It notes that dual enrollment “is an important part of most states’ Every Student Succeeds Act (ESSA) accountability measures and an effective high impact practice that can reduce the cost of college and students’ time to completion.” To address teacher pipeline problems associated with HLC credentialing requirements, the MHEC is currently working with the Education Commission of the States and NACEP on “resolutions.” While it lacks significant formal authority, the MHEC is a potentially powerful advocate for resources and policy measures that support expansion of dual enrollment.

**National Association of Concurrent Enrollment Partnerships**

NACEP aims to “ensure that college courses taught by high school teachers are as rigorous as courses offered on the sponsoring college campus.” It currently serves as an advocate for dual enrollment in all its forms. NACEP is a voluntary membership organization and is not associated with any governmental entity. It is the only national accrediting body for dual enrollment partnerships in which courses are delivered by high school teachers. It independently accredits dual enrollment programs based on a peer review process that evaluates program quality according to standards in six categories: partnerships, curriculum, faculty, students, assessment, and program evaluation.

For the 2018-19 academic year, there are 107 NACEP-accredited dual enrollment partnerships nationwide. Nearly half are concentrated in Midwestern states, with 15 programs in Iowa, 15 in
Minnesota, 13 in Missouri, and seven in Indiana.\textsuperscript{23} NACEP accreditation is comparatively less common in the GLCCPP states of Ohio, Illinois, and Wisconsin, where there are only three NACEP-accredited partnerships (two in Illinois, one in Wisconsin, and none in Ohio). None of the four GLCCPP community college anchor partners (Columbus State in Ohio, Harper College and Rock Valley College in Illinois, Madison Area Technical College in Wisconsin) are currently accredited by NACEP.

**STATE DUAL ENROLLMENT ECOSYSTEMS**

State institutions shape law and policy around dual enrollment in each of the three GLCCPP states. Dual enrollment’s proponents must understand the roles of these institutions, the current shape and relevant history of dual enrollment policy, and the relationship between these two, in order to advance their work strategically.

**Illinois**

*State Institutions*

The state-level agencies with greatest influence on dual enrollment in Illinois are the Illinois State Board of Education (ISBE), the Illinois Community College Board (ICCB), and the Illinois Board of Higher Education (IBHE).

**ILLINOIS STATE BOARD OF EDUCATION**

ISBE oversees the administration of preK-12 and vocational education in Illinois, and the governor appoints its nine members. In addition to maintaining standing committees in the areas of finance and policy, ISBE’s annual report to the governor and legislature “identifies [the state’s] specific [education] problems and recommends express solutions.”\textsuperscript{24} ISBE makes rules that determine how public education is implemented statewide.\textsuperscript{25} In particular, it develops rules in the areas of finance, educational standards, and educator licensure and evaluation. In theory, this gives ISBE considerable influence over dual enrollment policy. However, while current ISBE rules cover vocational education and advanced placement, they are virtually silent on dual credit.\textsuperscript{26}

According to state law, ISBE has responsibilities related to reporting on dual credit data, but the state’s higher education agencies—the Illinois Board of Higher Education and the Illinois Board...
Community College Board—have authority over dual credit program eligibility, standards, and oversight.27

ILLINOIS BOARD OF HIGHER EDUCATION

The IBHE oversees dual credit implementation at all higher education institutions statewide except public community colleges. The governor appoints IBHE’s chairman and 13 of its 16 members. Colleges must seek and receive formal approval from IBHE before offering dual credit coursework.28 They must also complete an annual report on dual credit activity to maintain this approval.29 IBHE rules require colleges that offer dual credit to provide students with related course descriptions, costs, and administrative policies and procedures. IBHE also has the right to revoke a college’s dual credit authorization if it loses accreditation.30 This provision effectively shares some of IBHE’s authority with the HLC, demonstrating how public and private institutions interact to shape the dual enrollment ecosystem.

ILLINOIS COMMUNITY COLLEGE BOARD

The ICCB oversees all dual credit programs offered by Illinois community colleges, including Harper College and Rock Valley College.31 The governor appoints all 11 members of the ICCB.32 It develops requirements for instructor and student qualifications, student placement testing, and course offerings.33 It maintains a centralized data system and creates extensive public reports about student achievement, finance, enrollment in special programs, and more. Dr. Lazaro Lopez, the associate superintendent for teaching and learning at Township High School District 214—a GLCCPP district—is the ICCB’s current board chair. The ICCB is receptive to dual enrollment; however, it is also subject to HLC’s guidelines on faculty credentialing.

COLLABORATION

Overall, the ISBE, IBHE, and ICCB share responsibility for administrative oversight and policy development related to dual enrollment in Illinois, and each owns a different piece of the puzzle. The governor effectively controls all three agencies. Robust coordination between the three agencies has the potential to significantly advance dual enrollment in Illinois, while a lack of collaboration can lead to incoherence and/or misalignment among the state’s dual enrollment programs.

To address this need for inter-agency collaboration, in 2009 the state legislature established the Illinois P-20 Council to “foster collaboration among state agencies, education institutions, local schools, community groups, employers, taxpayers, and families.” The P-20 Council’s goal is to “increase the proportion of Illinoisans with high-quality degrees and credentials to 60 percent
by the year 2025.” The governor appoints council members. While it lacks formal authority, it has significant influence on agenda setting because it can make recommendations to state leaders. Northern Illinois University’s Education Systems Center—one of GLCCPP’s three primary technical assistance providers—staffs the P-20 Council’s standing College and Career Readiness Committee, which helps drive state legislation and policy related to education, including dual enrollment.
State Law and Policy

Dual Credit Quality Act of 2009

In Illinois, the legislation that has most affected dual enrollment’s recent trajectory is the Dual Credit Quality Act of 2009 (DCQA). It aimed to ensure that the state offers high quality dual credit courses, in part by establishing nine standards that all colleges offering dual credit courses must meet. Before it was amended through Illinois Senate Bill 2838 in 2018 (see below for more information), DCQA standards emphasized that high-school-based dual credit courses should be equivalent to the on-campus college versions of the same courses.

Specifically, the standards required that:

- Dual credit high school teachers meet “the same” credential requirements as their college counterparts
- High school students meet “the same” academic and assessment criteria as college students; course content and learning outcomes be “the same”
- Higher education institutions provide high school instructors of college courses with an orientation in the course’s curriculum and the same professional development offered to other adjuncts

The act also required colleges to review high school dual credit courses annually to ensure they are consistent with the corresponding college course, and to provide annual dual credit data reports to the ICCB.

While the 2009 DCQA represented an admirable focus on high quality dual enrollment at the state level, it did little to promote expansion of or access to dual enrollment. It may have even inadvertently restricted them. The administrative requirements of the DCQA— instructor credential review, orientation, and development; curriculum alignment; general oversight and coordination; data reporting—are sensible, but they are also expensive. In a 2014 study, Illinois community colleges reported that dual enrollment administrative costs ranged from less than $10,000 to more than $250,000 each year. Harper College estimated its annual administrative costs at $64,000.

The DCQA also directed the ICCB and IBHE to develop policies to regulate student eligibility for dual credit coursework using “differentiated assessment” measures to “ensure that a student is prepared for any coursework in which the student enrolls.” In response, the two agencies developed a rule that required students taking dual credit to possess “appropriate academic qualifications, a high level of motivation, and adequate time to devote to studying a college-level
course.” The rule also states that dual credit courses “are restricted to students who are able to

demonstrate readiness for college level work, as determined by placement procedures consistent

with those that would be used with college level students.” The DCQA itself also stipulated that
dual credit students meet “the same academic criteria as [traditional college students], including
taking appropriate placement testing.”

**Senate Bill 2838 (2018): Expanding the Dual Credit Quality Act**

More recent legislation in Illinois seeks to maintain dual enrollment quality, while promoting
expansion and access. Illinois Senate Bill 2838, which passed both houses of Congress in May
2018 and were signed by Governor Bruce Rauner in August 2018, does this by selectively
amending the DCQA.

While the initial DCQA established standards for how community colleges must operate and
oversee dual credit courses, it did not require them to actually offer dual credit courses—and
many may have found that the financial incentives to do so were not compelling. SB 2838 closes
this gap by stipulating that an Illinois community college must partner with a local K-12 school
district to offer dual enrollment courses if the district makes a request. In effect, dual enrollment
participation is no longer voluntary, but rather compulsory, for Illinois community colleges. In
addition, all inter-institutional agreements must now include terms regarding administrative
roles and responsibilities, student eligibility, costs and fees, and high school teacher adjunct
qualifications. The new DCQA further specifies that if a community college and K-12 district are
unable to develop a customized partnership agreement within 180 days after a K-12 district
makes a request, they must use a default “Model Partnership Agreement”—to be jointly
developed by ISBE and ICCB by July 2019.

SB 2838 explicitly allows K-12 districts to offer any course in the Illinois Transferable General
Education Core Curriculum as a dual credit course taught on a high school campus by a
qualified high school instructor. Students who complete these courses can transfer their
credits to colleges across the state in connection with the Illinois Articulation Initiative. SB 2838
also prohibits K-12 districts from offering dual credit courses through out-of-state colleges if
local colleges offer comparable courses. Together, these provisions promise to expand Illinois’
in-state dual enrollment industry.

Perhaps anticipating that this expansion might exacerbate challenges related to the dual
enrollment teacher pipeline, SB 2838 maximizes teacher eligibility. First, it states that high
school teachers must meet, but “shall not be required to exceed,” HLC guidelines in order to
teach dual credit courses. This prohibits community colleges or academic departments from
establishing requirements beyond what the HLC requires. Second, SB 2838 directs ISBE to
attach a “Dual Credit Endorsement” to the license of any teacher who meets HLC standards, effectively creating a dual enrollment teaching credential. Third—and perhaps most significant—SB 2838 stipulates that high school teachers who do not meet the HLC standards can teach dual credit courses for up to three years if they make satisfactory progress towards earning HLC’s required credentials. This provision represents a huge step forward for advocates of dual credit access. Ohio’s “Transition with Quality” provision is somewhat similar, but it is an obscure internal guideline that is explicitly reserved for rare and exceptional circumstances.

SB 2838 loosens other dual enrollment restrictions as well. Whereas the initial DCQA required that dual enrollment course content was “the same” as that of traditional college courses, SB 2838 only requires that it is “equivalent.” SB 2838 also eliminates the requirement that colleges provide high school adjuncts with an orientation, instead stating that teachers must “participate in any orientation developed by the [college] for dual credit instructors.” These changes provide new flexibility while maintaining high quality.

Finally, SB 2838 offers additional financial support for dual enrollment providers. Specifically, under the law, the ICCB can now award “dual credit grants” to community college districts to expand their dual credit offerings. These grants are over and above the funding community colleges receive via per-pupil state funding and are also “subject to appropriation.”

Altogether, SB 2838 is a major step forward for dual credit in Illinois, making it a national leader in encouraging both quality and supply of dual enrollment coursework via state law and policy.

**POSTSECONDARY AND WORKFORCE READINESS ACT (2016)**

The Postsecondary and Workforce Readiness Act of 2016 also plays a role in Illinois’s dual enrollment ecosystem. As of the 2019-2020 school year, the PWR Act permits public school districts to offer students the option of earning a “College and Career Pathway Endorsement” on their high school diplomas. To earn a CCPE, students must complete a career-focused instructional sequence and, as of the 2022-2023 school year, they must earn at least six hours of credit through “early college” courses. Dual credit courses qualify as “early college” courses, as do AP, IB, and articulated credit courses.

The PWR Act permits school districts to offer CCPEs, but it does not require them to offer CCPEs. It does not require institutions to offer or students to take dual enrollment courses to satisfy the early college requirement either. However, the state’s accountability system incorporates a College and Career Readiness Indicator, and students can partially satisfy the requirements for this indicator by earning a CCPE.
Funding

Beginning in 2001, the ICCB offered grants—initially called ACE (Accelerated College Enrollment) grants and later called P-16 grants—to help community colleges “expand their service” around dual credit courses for high school students. These grants supplemented the core funding community colleges already received from the state based on student enrollment, and they were substantial enough to cover a significant portion of dual credit’s overhead costs. In FY2006, the ICCB awarded more than $2.2 million in P-16 grant funding, of which Harper College received $134,551 and Rock Valley College received $61,716.

These grants ceased in 2008, the year before the Dual Credit Quality Act passed. In fiscal years 2014, 2015, 2017, and 2018, the ICCB offered an application-based Dual Credit Enhancement grant to “support the development, enhanced delivery and evaluation of local dual credit programs.” However, at a maximum of $10,000 per award, these grants were limited in scope and impact. In 2018, SB 2838 restored grant funding for dual credit programs, as described above.

Cost and Revenue for Community Colleges

Even in the absence of supplemental funding, dual credit course offerings can produce significant revenue for community colleges. In 1996, the ICCB changed its administrative rules to allow both the K-12 district and the partnering community college to receive state funding for high school students taking dual enrollment courses. K-12 districts can receive funding based on student enrollment levels and colleges can receive funding based on full-time enrollments for the same student. Not all states take this approach—known as a “hold harmless” or, less favorably, “double dip” approach. In Ohio, for example, when students participate in dual enrollment, either their K-12 “home” district or the college partner miss out on revenue.

Community colleges receive the vast majority of their annual state revenue through base operating grants and equalization grants. Together they comprise over 75 percent of total state funding for community colleges and 95 percent of their unrestricted funding. Both of these grant sources incorporate dual credit enrollment hours.

Base operating grants fund community colleges on a per-credit-hour basis, with a rate that depends on course type—baccalaureate, business, technical, health, remedial, and adult basic or secondary education (ABE/ASE). This rate ranges from $10.63 for remedial courses to $89.95 for adult education courses; the rate for baccalaureate courses, which account for over 60 percent of all credit hours, is $25.01.
Funding Deep Dive:
Illinois State Revenue for Dual Enrollment at GLCCPP Community Colleges

In FY18, Harper College received slightly more than $7 million in base operating grant funding, and roughly seven percent of that total—nearly $500,000—came from dual enrollment courses. Between FY16 and FY17, Harper College increased its volume of dual enrollment credit hours offered by 35 percent (nearly five thousand additional hours), which raised its equivalent revenue by more than $100,000.

Rock Valley College (RVC) also received roughly seven percent of its FY18 base operating grant revenue—or roughly $270,000 of $3.9 million in total—from dual enrollment credit hours.

RVC’s local tax revenues fall short of the per-student amount the state deems necessary to adequately fund operations, so the college receives equalization grant funding from the state. This grant also incorporates dual enrollment. The amount of equalization grant funding a community college receives depends on its student enrollment and the gap between local tax revenues and the state-defined adequacy threshold.

In FY18, RVC received roughly $3.366 million in equalization grant funding, which is the equivalent of $628 per full-time enrollee (FTE) for 5,360 students. According to the state’s Public Community College Act, 15 hours of college credit—regardless of dual enrollment status or course type—translates into one FTE. In FY17, RVC provided 10,595 hours (706 FTEs), meaning that the institution derives more than $400,000 in annual equalization grant funding from dual enrollment.

Altogether, Harper College generates roughly $500,000 and RVC generates approximately $700,000 in annual state revenue based on their dual enrollment course offerings.

To a community college, the direct cost of offering a dual enrollment course on its own campus, taught by a college professor, is far higher than that of offering the same course on a high school campus, taught by an approved high school adjunct. In the former case, the college must pay an instructor; in the latter, it does not. However, the college receives the same amount of state base
operating grant funding in either case. Some community colleges in Illinois even pay K-12 districts a stipend when high school teachers teach dual credit courses on high school campuses, likely thanks to this cost difference.\textsuperscript{55}

State funding is not the only source of revenue for community colleges, which may also charge tuition and receive local tax revenues. State-level dual enrollment policies do not set the tuition rates or fees that community colleges can charge for dual enrollment courses. Similarly, they do not stipulate the extent to which K-12 students and their home districts share responsibility for paying tuition and fees. As a result, dual enrollment tuition rates and fees vary considerably across Illinois. As of 2014, community college tuition for a three-hour dual credit course ranged from $0 to $410 and fees ranged from $0 to $91; half of community colleges charged tuition and/or fees for dual credit courses and half did not.\textsuperscript{56}

\textbf{Cost and Revenue for K-12 Districts}

For K-12 districts in Illinois, the revenue implications of dual credit are murkier. K-12 districts do not lose state funding when high school students enroll in dual credit courses, nor do they receive any additional funding to cover administrative costs associated with dual enrollment. When community colleges in Illinois charge tuition or fees, K-12 districts may pick up some or all of the tab—including for courses taught by high school teachers on high school campuses.\textsuperscript{57} Families pay for any costs that are not covered by the school. K-12 districts often pay for textbooks for dual credit students as well. Consequently, K-12 districts may incur substantial direct costs by offering dual credit courses.

K-12 districts may face even greater indirect costs such as administrative overhead. Another indirect cost is developing and maintaining a qualified dual credit teaching force. Dual credit teachers are likely to cost more than “regular” teachers. “Regular” teachers of general education courses—even AP courses—only need a bachelor’s degree to teach. Based on HLC requirements, dual credit teachers need at least a master’s degree. To attract or produce enough teachers who have these qualifications, K-12 districts generally need to spend more. Potential costs include stipends for teaching taking graduate-level coursework or teaching dual credit courses, permanent salary increases for teachers who have advanced credentials, or innovative programming to make it easier for high school teachers to gain these credentials.

Dual enrollment may seem unappealing for some K-12 districts since it increases their costs without increasing their revenue. However, it may be worth it if it produces better student outcomes, and this is essentially the bet that Illinois K-12 districts make when they offer dual credit courses. There is little doubt that K-12 districts would find it easier and be more willing to significantly scale up dual credit programs if they received additional funding or could avoid
some of the additional costs like textbooks, teachers, and tuition. New grant funding under SB 2838 may provide some financial relief. Regardless, the revenue implications of dual enrollment are far rosier for K-12 districts in Illinois than for those in Ohio.

Ohio

State Institutions

Ohio Department of Higher Education

While both Illinois and Wisconsin split postsecondary oversight between two separate agencies, one responsible for two-year and one for four-year colleges, Ohio’s Department of Higher Education oversees the University System of Ohio, which includes all public higher education institutions in the state. Ohio’s governor appoints the ODHE’s chancellor, who “provides policy guidance to the Governor and the Ohio General Assembly, and carries out state higher education policy.”  

Ohio Department of Education

The Ohio Department of Education oversees the state’s public K-12 system. It administers school funding, licenses educators, and monitors the state’s educational service centers, but College Credit Plus is administered through ODHE. ODE’s 2019-2024 strategic plan does include a section on “advancing successful models” under its High School Success and Postsecondary Connections strategy, a reference to early college high schools, STEM and STEAM schools, AP and IB, and project-based learning.

Collaboration

Under CCP’s authorizing legislation, ODHE clearly has authority over dual enrollment. It states that the “[ODHE] chancellor, [...] in consultation with the state superintendent, shall adopt rules governing the program.” To promote collaboration between ODHE and ODE around CCP, Ohio convenes a seven-member College Credit Plus Advisory Committee. Its focus is far narrower than that of the Illinois P-20 Council, as its primary charge is to develop performance metrics for CCP; its programmatic influence is comparatively limited.
In Ohio, the state-level policy that most affects dual enrollment is College Credit Plus. Beginning in 2015, CCP replaced the Post-Secondary Enrollment Options program as the primary vehicle for dual enrollment statewide. PSEO, the previous dual enrollment program, was underutilized, especially when compared to competitor programs like AP. While PSEO funded dual enrollment for students in grades 9 through 12 only, CCP expanded eligibility to grades 7...
through 12. Unlike under PSEO, under CCP “districts are not permitted to restrict an otherwise qualified student’s participation in any way.” For example, a district cannot require a counselor’s recommendation or set higher prerequisites than state rules demand.

All public secondary schools and all public colleges must participate in the CCP program. Under CCP, dual enrollment courses offered via Ohio’s public colleges and universities are completely free to students, many of whom would have paid for the same courses under PSEO. In the program’s first year, it served more than 54,000 students at 71 institutions of higher education. In the 2016-17 school year, participation rose to more than 68,000 students, 70 percent of whom were in grades 11 and 12. Students can earn up to 30 college credits per year under CCP, or up to 120 credits total, and each college credit under CCP converts into one third of a K-12 credit hour.

From the beginning, CCP’s proponents conceived of it as a key strategy to help Ohio meet its statewide attainment goal of 65 percent of Ohioans earning a degree, certificate, or other postsecondary workforce credential by 2025. In support of this goal, CCP requires every public high school to develop at least one 15-credit and one 30-credit pathway in partnership with at least one college, and to publish these as part of a school district’s official course offerings.

HOUSE BILL 49 (2017): UPDATING COLLEGE CREDIT PLUS

In 2017, House Bill 49 updated CCP to be more inclusive and increase student access. CCP has always featured eligibility restrictions and entry requirements for students. Students must score above a “remediation-free threshold” on at least one state-approved standardized test to be eligible for the program. Under HB 49, students who fail to meet this threshold but score within a predetermined range below it can become “conditionally” eligible by either maintaining a GPA of at least 3.0 or by submitting a recommendation from a counselor, principal, or CTE advisor at their school.

In addition, HB 49 increased restrictions on what dual enrollment courses students can take. CCP has always prohibited students from taking “remedial” dual enrollment courses. Other than that, CCP students were allowed to take “any courses offered by” the colleges, as long as they were eligible. This generated concern among administrators, including ODHE’s Dr. Larisa Harper, the state’s director of College Credit Plus, that “students were taking Zumba and Pilates at the expense of state taxpayers.” ODHE now requires students to complete at least 15 hours of “Level 1” courses—to be defined by ODHE, but generally rigorous and well-aligned to college and career readiness—before taking other dual enrollment courses under CCP.
HB 49 also increased expectations and restrictions for students who are underperforming. Students who withdraw from two or more courses in a single term or earn lower than a 2.0 cumulative GPA in college courses can enroll in only one college course at a time. If a student’s GPA in these courses continues to drop, that student will be dismissed from the CCP program entirely (subject to re-entry appeal after one semester).

**Funding**

Ohio does not employ a “hold harmless” approach to funding dual enrollment as Illinois does. Ordinarily, a K-12 district receives annual state funding of $6,000 per enrolled student. However, when a high school student takes a dual enrollment course, ODE transfers a portion of this allocation to the college offering the course. The deduction ranges from roughly $41 per credit for dual enrollment courses taught by qualified high school adjuncts on high school campuses up to $166 per credit for courses taught on the college campus.

There is a funding floor so that a K-12 district never receives less than 17 percent of a student’s base funding allocation (about $1,020), even if that student enrolls solely in dual enrollment coursework. However, this means that a K-12 district could theoretically lose up to 83 percent of its state funding for a student who takes only dual enrollment courses. In addition to the loss of a percent of per pupil funding, K-12 districts must pay for all dual enrollment course textbooks.

While districts in Illinois do not lose any state funding for offering dual enrollment programs, Ohio’s K-12 districts are both required to have dual enrollment programs and to pay at least partial costs of offering them. (Under PSEO, CCP’s predecessor, districts were required to pay but not required to do more than inform students that dual enrollment was an option.) Unlike CCP, PSEO did not prohibit students from paying tuition for dual enrollment courses. According to one superintendent, this change shifted “the cost of dual enrollment to the [high] school and away from parents who are perfectly willing to pay.” In response, Ohio’s K-12 districts have lobbied for financial relief, but have only been modestly successful. K-12 districts continue to bear most costs, though under HB 49 colleges must pay for each CCP student to take one standardized assessment, which is required for program eligibility.

CCP increased participation in dual enrollment, and initially there were not a sufficient number of teachers certified to meet demand. Thus, Ohio offered colleges and K-12 districts a one-time grant to support dual enrollment teacher credentialing under CCP in 2015. The grant totaled $10 million, spread across 19 grantees. ODE and ODHE awarded this funding jointly; half went to colleges and universities to design “teacher-friendly” programs and the other half allowed “colleges, universities and high schools to identify and support teachers” as they earned such
credentials. However, it is difficult to ascertain the impact of this grant, as there was no comprehensive analysis and it was not renewed.

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**Early College High Schools:**

**A Dual Credit Alternative to College Credit Plus in Ohio**

State policy requires College Credit Plus to be the sole source of state funding to colleges for dual enrollment, with one exception: Early College High Schools. Early College High Schools: focus on traditionally underrepresented and underserved student populations, enable students to take college-level courses for both high school and college credit during grades 11 and 12 (usually at no cost), and are required to provide wraparound services.

Early College High Schools are exempt from CCP funding agreements and student eligibility requirements. Public high schools must apply to and be approved by ODE to become Early College High Schools.

In the summer of 2017, state law changed to revise the definition of Early College High Schools to include a personalized learning plan for each student and emphasize the target population as underrepresented, economically disadvantaged, and first-generation students. Sixteen schools submitted applications for the 2018-19.

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**STATE ACCOUNTABILITY**

Ohio’s state report card includes a metric called “Prepared for Success,” which is based on the percentage of students who are deemed college and career ready. It divides the number of students considered college and career ready by the total number of students in that graduation cohort. To be considered college and career ready (and counted in the numerator) for this metric, a student must earn either a passing score on the ACT or SAT, an Honors Diploma, or an industry-recognized credential.

None of these three criteria directly incorporate dual enrollment; therefore, if a student does not satisfy one of them, dual enrollment is irrelevant to a school or district’s rating. If a student does meet one of these three criteria, he or she can “count” for an additional three-tenths of a student in the numerator by earning at least three dual enrollment credits. A student can also earn
these same “bonus” points by scoring 3 or higher on at least one AP test or 4 or higher on at least on IB test. This metric does not offer schools and districts any direct incentive to help students earn more than three dual enrollment credits.

**Wisconsin**

*State Institutions*

The state-level institutions that have the greatest influence on dual enrollment in Wisconsin are the Wisconsin Department of Public Instruction (DPI), the University of Wisconsin System (the UW System), and the Wisconsin Technical College System (WTCS).

**Wisconsin Department of Public Instruction**

DPI is responsible for K-12 education in the state, and its vision for Wisconsin is that “every child is a graduate, college and career ready.” Like its sister K-12 agencies in Ohio and Illinois, DPI oversees teacher licensing and, like those agencies, its role in determining dual enrollment policy is limited. Its website features a short dual enrollment section, which prominently references the state’s new Early College Credit Program (limited to dual enrollment courses offered via four-year colleges), and directs school districts to contact WTCS about dual enrollment at two-year colleges.

**The University of Wisconsin System**

The UW System is governed by its Board of Regents, 16 of whom are appointed by the governor, subject to Senate confirmation. It is composed of 13 universities and 13 two-year colleges. The UW System’s board is responsible for making policies and rules and for “establishing the regulatory framework within which the individual units are allowed to operate with as great a degree of autonomy as possible.” The board appoints the president of the UW System and the chancellors of each of its institutions. Despite the UW System’s somewhat decentralized approach, it aims to provide “additional opportunities for students to complete college coursework while in high school” and dedicate “resources to connect high school teachers to the university, preparing them to teach college coursework.”

**Wisconsin Technical College System**

WTCS governs two-year technical colleges, which award two-year associate degrees, one- and two-year technical diplomas, and short-term technical diplomas and certificates. Its board
consists of 13 members, who are appointed by the governor and confirmed by the Senate. WTCS governs 16 technical colleges and embraces its role as an economic and workforce development engine, emphasizing its “unique connections to employers” and the “economic vitality of students, employers, and communities.”\textsuperscript{93} This focus stems from state law, which declares that it is “in the public interest to provide a system of technical colleges which enables eligible persons to acquire the occupational skills training necessary for full participation in the work force.”\textsuperscript{94}

WTCS prioritizes sustaining and expanding enrollment offerings, and it requested state funding in Wisconsin’s 2017-19 biennial budget specifically for this goal. It sought $2.8 million annually to help “high school teachers to meet educational requirements newly imposed by [the Higher Learning Commission], and continue to teach WTCS courses in high school.”\textsuperscript{95}

In its request, WTCS noted that 75 percent of all dual enrollment credits earned by high school students in technical colleges statewide were from “dual transcripted credit” (DTC) courses—dual enrollment courses that are taught on high school campuses by qualified high school adjuncts.

It pledged to use the requested funding to “institutionalize” best practices to ensure qualifications of dual enrollment high school teachers.

These best practices include:\textsuperscript{96}

- Pairing high school teachers with WTCS faculty mentors
- Providing K-12 districts with stipends to defray the costs of substitute teachers while high school teachers attend dual enrollment meetings
- Enabling high school teachers to attend the on-campus college versions of the DTC course they will teach
- Sponsoring college memberships in NACEP
- Awarding high school teachers with scholarships to earn HLC’s required credentials
In 2016, pursuant to a $99,900 grant from the Lumina Foundation, WTCS, the UW System, and the Wisconsin Association of Independent Colleges and Universities cosigned a resolution agreeing to a statewide attainment goal called “60 Forward”: by 2027, 60 percent of adults in Wisconsin will hold a high-quality postsecondary credential. However, Wisconsin did not put in place structures nor make available resources comparable to those in place to support attainment goals in Ohio and Illinois. For example, Illinois supports its goal of “60 by 25” with its P-20 Council and 60 by 25 network, and Ohio connects its College Credit Plus program to its goal of 65 by 2025.
YOUTH OPTIONS AND COURSE OPTIONS

Before July 1, 2018, Wisconsin had two programs that allowed high school students to take college courses on two- or four-year college campuses—Youth Options and Course Options. Youth Options provided students with the opportunity to take courses that were not offered in their home K-12 districts. Course Options allowed admitted students to take any two college courses. Youth Options made courses available to students free of charge, while students paid no more than half tuition for Course Options courses. Wisconsin also had a third option in the form of DTC courses taught on high school campuses by qualified high school adjuncts. None of these approaches were mandated, leaving K-12 districts and partner colleges free to determine their own policies and processes through localized institutional agreements.

WISCONSIN ACT 59: REPLACING YOUTH OPTIONS AND COURSE OPTIONS

Wisconsin Act 59 has significant implications for the future of dual enrollment in Wisconsin. This biennial budget bill became effective as of July 1, 2018. It eliminated the Youth Options and Course Options program, and replaced them with a new program called the Early College Credit Program (ECCP).

Unlike Youth Options, the ECCP program and its terms only apply to courses offered by four-year colleges. Going forward, dual enrollment courses offered by technical colleges fall under a different statute and a different program called Start College Now, which WTCS administers. Effectively, Wisconsin Act 59 divided the dual enrollment system in Wisconsin into a four-year college track and a two-year college track.

EARLY COLLEGE CREDIT PROGRAM (UW SYSTEM AND PRIVATE COLLEGES)

ECCP governs dual enrollment courses offered through the UW system and private colleges in Wisconsin; it does not cover dual enrollment courses offered by technical colleges. This distinction is important, especially since ECCP includes financial provisions. These are especially significant because, unlike Illinois, Wisconsin does not have a “hold harmless” funding structure for dual enrollment coursework.

Beginning in 2018-19, ECCP provides a total of $1,753,500 in additional state funding to help pay a portion of student tuition for ECCP courses. It also specifies how K-12 school districts, the state, students, and colleges will share the costs of student tuition. For ECCP courses that provide both high school and college credit and are delivered on college campuses, K-12 districts must pay 75 percent of tuition, the state must pay 25 percent (via reimbursement of the K-12 district), and the student pays none. When students take ECCP for college credit only, high
schools must still pay 25 percent, students must pay 25 percent, and the state pays 50 percent. The state limits the tuition college can charge for these courses; for example, University of Wisconsin campuses can charge no more than half of the tuition they would charge a “regular” college undergraduate. Under this system, both K-12 districts and universities may lose net revenue by providing high school students with dual enrollment opportunities. Perhaps partly for cost reasons, ECCP caps each student’s participation at 18 credits over the course of a high school career.100

Nevertheless, ECCP expands dual enrollment offered via four-year colleges. Whereas Youth Options only pertained to students in grades 11 and 12, ECCP applies to students in grades 9 through 12.101 While Youth Options only applied to public school students, ECCP applies to both private and public high school students.

ECCP creates financial concerns for institutions that participate. More high school students taking dual enrollment courses means that K-12 districts could end up paying significantly more to colleges for tuition, based on the new cost-sharing models. It also means that colleges may, on average, collect less tuition per credit than they otherwise would. While state funding for ECCP exists, it is limited, and if it cannot fully fund all eligible claims, payments will be prorated—it is highly unlikely to take a “hold harmless” approach for participating institutions.

ECCP is virtually silent on the question of student eligibility, providing little in the way of either guarantees or restrictions. It merely states that higher education institutions will admit high school students into college courses if there is space available in the course and if the student “meets the requirements of the course.”102 This effectively leaves policymaking regarding student eligibility to colleges and—even more likely, in practice—to individual departments or professors.

START COLLEGE NOW (TECHNICAL COLLEGES)

WTCS’ Start College Now program governs dual enrollment courses offered via two-year technical colleges. As under Youth Options, students can only enroll in college coursework under SCN if comparable courses are not available in their home district. Students are only eligible for SCN if they have completed 10th grade, are in good academic standing, are not “at risk” (as defined in state statute 118.153(1)(a)), and have reimbursed their home district for any tuition associated with college courses under SCN they previously failed.103 K-12 districts may reject SCN applications from students who have a record of disciplinary problems, or students who have disabilities if the associated tuition cost would present an “undue financial burden” (as determined by the district). These conditions are far more restrictive than those under CCP in Ohio, and more restrictive than those even under ECCP in Wisconsin. They give K-12 districts,
in particular, considerable control over what standards students must meet to participate in
dual enrollment.

When a high school student takes a college class on a technical college campus via SCN, the
college receives the same amount of state funding as it would for a traditional college student. A
student’s home K-12 district is responsible for paying the technical college “an amount equal to
the cost of tuition, course fees, and books” for a traditional college student. Unlike ECCP for
traditional universities, SCN does not limit the tuition that Wisconsin technical colleges can
charge dual enrollees. Students themselves are only responsible for the cost of transportation. In
other words, while state funding policy effectively holds technical colleges (and students)
“harmless,” K-12 districts must cover the costs.

“TRANSCRIPTED CREDIT”: A GAP IN STATE POLICY

No Wisconsin statute, policy, or program covers DTC—dual enrollment courses offered on a
high school campus by qualified high school faculty. K-12 districts and colleges develop their
own agreements about curricula and cost sharing. Unlike in Illinois (under SB 2838), neither
state law nor rules from the UW System or WTCS specify what these agreements should include,
nor does the state provide a “model agreement.” Furthermore, the state’s ECCP funding cannot
be used for these courses, and state guidelines on cost sharing do not apply to them. Perhaps
most importantly from an equity standpoint, this means that—unlike with either ECCP or SCN—
students can still be charged tuition for courses that offer transcripted credit.

This gap in state policy is not an oversight. The initial version of ECCP did incorporate dual
enrollment taught by high school adjuncts on high school campuses. This effectively required
districts to pay (at least) 75 percent of the cost of tuition for these courses. Historically, K-12
districts had shouldered a smaller proportion of the cost, precisely because students were often
required to pay. In response to this change, a coalition of stakeholders including the Wisconsin
Association of School Boards, the Wisconsin Association of School District Administrators, and
the Wisconsin Association of Independent Colleges and Universities lobbied state officials to
pass new legislation that excluded DTC courses from ECCP.104

They succeeded, resulting in the passage of Assembly Bill 805, which became law as the 2017
Wisconsin Act 307. Act 307 amends ECCP to exclude any courses that are located on high school
district property, are taught by a high school teacher, or are offered through an agreement
between a school district and a private university or UW System institution.105
LOCAL DUAL ENROLLMENT ECOSYSTEMS

Local Institutions and Policy

*Madison, Wisconsin*

Madison’s local ecosystem for dual enrollment is led by the Madison Metropolitan School District (MMSD) in partnership with the University of Wisconsin-Madison and Madison College (MC), the city’s two-year postsecondary institution.

**Madison Metropolitan School District**

MMSD is Wisconsin’s second-largest public school district, with over 27,000 students in nearly 50 schools. In 2017, MMSD launched “Personalized Pathways,” in each of its four comprehensive high schools, with roughly 28 percent of the district’s incoming freshman class enrolled. Dual enrollment is promoted as one of the attractive aspects of Personalized Pathways for students in graders 11 and 12, along with CTE, career academies, online coursework, and alternative school options.” This is a component of MMSD’s high school achievement and completion strategy. For example, MMSD’s first Personalized Pathway, Health Services, is described as a way for students to “progress through their core high school content courses, from ninth grade until graduation, in a smaller learning community, allowing them to develop strong, positive relationships with a close-knit group of students and staff.”

This high-school-centric and academic emphasis may stem in part from community resistance to Personalized Pathways that emerged even before the program launched. Some parents expressed concern that Personalized Pathways amounted to “tracking,” that it was overly “occupation-centric,” and that it would limit choices and elective opportunities. According to one parent, “When I look at the course of study, I see a very clear way that a student can get a medical assistant certification or maybe enter a vocational training program at (Madison College)... what is harder for me to see is how a student who wants to apply to a school like UW-Madison can meet their college-bound requirements in a way that isn’t burdensome.”

MMSD’s initial vision was to offer four to six Personalized Pathways and make the initiative compulsory for all students by the 2022-23 school year. In 2018-19, MMSD has two cohorts of students in its Health Services pathway. It plans to offer Information Technology and Communications pathways in 2019-20. In general, the dual enrollment courses or “early college credit options” are under CTE, rather than integrated into the academic core of the Personalized Pathways experience.
MADISON COLLEGE

MC currently offers 33 different DTC courses. Of these, 11 were available to students in at least one MMSD high school during the 2017-18 school year, but no single DTC course was available at all MMSD high schools. According to MC, “the classes we offer at individual high schools are the high school’s decision based on their curriculum needs and staff expertise.”

<table>
<thead>
<tr>
<th>Dual Transcripted Credit Course at Madison College</th>
<th>Credits</th>
<th>Offered at MMSD High School</th>
</tr>
</thead>
<tbody>
<tr>
<td>A+ Hardware Essentials</td>
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<td>James Madison Memorial High School</td>
</tr>
<tr>
<td>Adobe Photoshop</td>
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<td>None</td>
</tr>
<tr>
<td>Beginning Access 2013 [Microsoft]</td>
<td>1</td>
<td>Robert M. La Follette High School</td>
</tr>
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<td>Beginning Excel 2013 [Microsoft]</td>
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<tr>
<td>Beginning PowerPoint 2013 [Microsoft]</td>
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<tr>
<td>Publisher [Microsoft]</td>
<td>1</td>
<td>None</td>
</tr>
<tr>
<td>Accounting 1 – Principles</td>
<td>1</td>
<td>La Follette; Memorial</td>
</tr>
<tr>
<td>Elementary Algebra with Applications</td>
<td>3</td>
<td>East High School; Memorial</td>
</tr>
<tr>
<td>Biotechnology Applications</td>
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<td>Course</td>
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<td>Teachers</td>
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<tr>
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<tr>
<td>Principles of Sanitation</td>
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<td>Principles of Sustainable Soil and Crop Management</td>
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<tr>
<td>College Success</td>
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<tr>
<td>Fundamentals of Construction</td>
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<tr>
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</tr>
<tr>
<td>Introduction to College Writing</td>
<td>3</td>
<td>East; West; Shabazz</td>
</tr>
</tbody>
</table>
Due to Wisconsin’s light touch state guidelines on student eligibility for dual credit programs, colleges like MC (and their district counterparts) have flexibility in deciding how to operate their dual enrollment programs. MC’s website notes that dual credit is available to “high school juniors and seniors who have maintained a high grade point average and are ready for the challenge of a college-level course. They may not have any significant disciplinary problems on their student record.” What constitutes a “high” GPA, a “significant” disciplinary problem, or “readiness” for college courses is not explicitly defined.

According to MC policy, students can only receive college credit for DTC courses if they earn a grade of C or above and the courses are “identical” to those taught on MC’s campus. MC directs students to speak to their high school counselor to express interest and learn what DTC courses are available at their high school. Then students have to use MC’s student portal to create an account and enroll in classes. MC also requires that students work with their high schools to get required textbooks and that they provide their final course grades to their high schools. Additionally, students can request accommodations through MC’s department for Disability Resource Services.

High school teachers must apply via MC’s general jobs website for each DTC course they want to teach. To teach a course in the fall, teachers must apply by December of the prior academic year. MC reviews and decides on individual teacher applications by early January; approved teachers must attend mandatory training(s) in the spring. High school teachers must renew their MC approval to teach DTC courses on an annual basis.
MC’s dual credit website notes that DTC teachers must satisfy the HLC’s part-time faculty requirements and, at least in principle, MC departments may also require additional credentials and/or qualifications. In reality, the academic credentials required to teach certain courses—even non-CTE “transfer” courses in traditional academic disciplines—are less than those required by HLC standards. For example, teaching Elementary Algebra with Applications (MATH 108.4110) through MC requires only a bachelor’s degree in mathematics. MC enjoys the flexibility to make exceptions like these and remain in full compliance with HLC’s guidelines because it applied for and received an extension (until 2022) to comply with them.

## Snapshot: Required Academic Credentials for High School Adjuncts at Madison College

The academic credentials required of a high school teacher who teaches DTC courses at MC vary substantially by course and department.

### Medical Terminology (MEDTERM 10501101; Health Related Professions; 3 credits):

- Bachelor’s degree

- OR seven years of combined experience and education AND two years of related work experience, one of which must be in past five years

### Biotechnology Career Seminar (BIOTECH 10007111; Biotech & Electron Microscopy; 1 credit):

- Bachelor’s degree in biology or biological chemistry AND related work experience (five years if bachelor’s degree, two years if master’s degree or higher)
Beginning Access [Microsoft] (COMPSOFT 10103145; Business Technology; 1 credit):

Master’s degree in business, business administration, business education, or other related field of study

OR bachelor’s degree in business, business administration, business education, or other related field of study AND three years of related work experience

Introduction to College Writing (ENGLISH 10831103; School of Arts & Sciences; 3 credits):

Master’s degree in English

OR master’s degree in a “closely-related” field with at least 18 graduate-level credits in English

OR bachelor’s degree in English / secondary licensure in English or language arts

Elementary Algebra with Applications (MATH 10834110; School of Arts & Sciences; 3 credits):

Bachelor’s degree in mathematics / secondary licensure in mathematics

Woodworking 1A: Machinery & Methods (CABMIL 31409328/Construction; 2 credits):

Associate’s degree with tested experience

OR technical diploma aligned with the Woodwork Career Alliance Skill Standards AND two years of related experience

Four-Year Institutions

University of Wisconsin-Madison (UW-Madison) and Edgewood College are the Madison region’s two major four-year postsecondary institutions in the GLCCPP partnership.
The UW System makes dual enrollment coursework available to high school students under ECCP. Students in grades 10 through 12 are eligible for dual enrollment coursework at the UW System’s 13 two-year branch colleges—the UW Colleges—if they have a cumulative high school GPA of 2.0 or better. While students in grades 9 through 12 are eligible to take dual enrollment coursework under ECCP, UW-Madison’s student eligibility guidelines are more restrictive: it allows only 11th and 12th graders to participate, only for one course per term, and only if they have a GPA of 3.0, both cumulatively and in the most recent semester.

Neither Edgewood College nor UW-Madison currently offer DTC coursework. In other words, none of their classes are taught by high school teachers or on high school campuses. That said, if MMSD entered into an agreement with a UW College to offer DTC courses, any credits that an MMSD student earned could be transferable to UW-Madison under Wisconsin’s Universal Undergraduate Credit Transfer Agreement.

Northwest Suburbs of Chicago, Illinois

K-12 AND POSTSECONDARY PARTNERS

GLCCPP features three K-12 district partners located in the Northwest Suburbs of Chicago, Illinois: Township High School District 211, Township High School District 214, and Barrington District 220. D211 and D214 are the two largest high school districts in Illinois, with each serving nearly 12,000 students. D211 has five high schools and two alternative high schools and serves 11 villages; D214 has six high schools and four specialized programs and serves eight villages. Barrington 220 is a preK-12 district with nearly 9,000 students, roughly 3,000 of whom attend the district’s one high school.

Harper College is a postsecondary partner for GLCCPP in the Northwest Suburbs of Chicago, Illinois. During the 2018-19 school year, Harper College offered 75 courses for dual credit, 51 of which were offered on at least one high school campus. In 2017, more than 4,000 high school students enrolled in dual credit courses at Harper—the third largest enrollment among all Illinois community colleges—and dual credit students comprised 16 percent of all Harper enrollees. In fiscal year 2017, Harper College awarded nearly 18,000 dual enrollment credit hours; of these, about 25 percent were in technical courses, nearly 60 percent were in baccalaureate courses, and the remainder was about evenly split between health courses and business courses.

Harper College charges high school students tuition and fees for dual enrollment courses offered on the college campus, and waives all tuition and fees for dual credit courses offered on high
school campuses. By contrast, in both Ohio and Wisconsin, state law and policy prohibit charges for any form of dual enrollment.\textsuperscript{120}

**NORTHWEST EDUCATIONAL COUNCIL FOR STUDENT SUCCESS**

The Northwest Educational Council for Student Success (NECSS) is the regional intermediary organization that facilitates and coordinates interaction and policymaking among D211, D214, D220, and Harper College. It began in 2010 through a memorandum of understanding (MOU) among these four institutions and $250,000 in initial seed money from Harper College. Its goal is to help “develop programs, share talent and data, and leverage joint resources to ensure that every high school and college graduate will have the opportunity to be prepared for 21\textsuperscript{st} century careers and postsecondary readiness/success.”\textsuperscript{121}

The initial MOU paved the way for a joint agreement on data sharing in 2010, an intergovernmental agreement in 2010, an annual guide to the early college credit curriculum since 2014, and a guide to procedures for early college credit course offerings. From the beginning, the partners conceived of NECSS as a vehicle to ensure that course sequences form coherent career pathways from high school through a postsecondary credential and fit appropriately within the state’s P-20 framework and Harper College’s strategic plan.

**COORDINATION AND COLLABORATION**

The dual enrollment system established by Harper College and its three GLCCPP partner K-12 districts is notable because it is very specific, centralized, and transparent. Harper College’s dual credit program is part of a larger high school partnership program with D211, D214, and Barrington 220. Students must attend school in one of these districts in order to participate.

Unlike in the Madison and Columbus regions—where high school students and teachers themselves have to initiate contact and manage formal relationships with colleges to participate in dual enrollment courses—Harper and its partner K-12 districts have designated liaisons who coordinate these administrative interactions on behalf of high school students and teachers. Stakeholders in the Northwest Suburbs developed streamlined intra- and inter-institutional processes for managing the dual credit system.

Harper College’s dual credit website informs students that: “Your high school counselor will help you select classes that will work with your schedule, assist you in the application process, and answer any questions you may have regarding the program. All processes, including enrolling in classes, acceptance in to the program, and dropping classes are completed through your high school [emphasis added].”\textsuperscript{122}
Harper College also centrally manages the process for approving high school teachers to teach dual credit courses. Each district’s liaison identifies candidates to teach specific dual enrollment courses and sends their transcripts to Harper College’s dedicated full-time dual credit coordinator who tracks all applications and forwards these transcripts to the appropriate deans at Harper College. High school teachers do not complete official adjunct faculty applications.

DUAL ENROLLMENT COORDINATION IN THE NORTHWEST SUBURBS

In part thanks to this deliberate approach and in part because of its access to the broad and deep talent pool in the Chicago metropolitan area, the Northwest Suburbs has a stronger teacher pipeline than other GLCCPP regions. Still, Harper College is piloting a new program this fall to allow one of its professors to teach two to three dual credit courses related to health careers on high school campuses. This professor will become a district employee, and the district will pay her directly; at the same time, she will remain a college instructor, and Harper will pay for her benefits. If this pilot succeeds, it could become a useful workaround that other high school and college partners can use.
To be transparent and clear about what courses it offers for dual credit, Harper College publishes a detailed Early College Credit Curriculum Guide that lists every course it offers for dual credit, along with the prerequisites, campus location (i.e. high school or college campus), participating districts/high schools, and required textbooks.

Harper also provides excellent guidance around how NECSS partners can come together to initiate and manage all dual credit course offerings through its Early College Credit Course Offerings Procedure Guide. Regional stakeholders created this guide in multiple iterations, based on NACEP’s best practices, an analysis of Illinois state law and administrative rules, and input from multiple district and college instructors and administrators.

The guide describes how any NECSS partner can offer a new Harper course for dual credit and removes any potential ambiguity around this process. It defines the roles and responsibilities of individual K-12 and college employees—including Harper College’s associate provost, dual credit coordinator, and deans, as well as high school administrators, faculty, and department chairs. It also details student eligibility and attendance; inter-institutional information sharing; course grades, drops, and withdrawals; course costs; and, billing policies. It even includes a blank copy of the form that high schools must submit to start the process.

Because of its highly coordinated approach, the Northwest Suburbs region is well on its way to achieving dual enrollment at strategic scale. In fact, 27 percent, 20 percent, and 14 percent (respectively) of 10th through 12th graders at D211, D214, and D220 participate in dual enrollment (compared to just six percent in Madison and two percent in Rockford).123

**Rockford, Illinois**

**Rockford Public Schools**

Rockford Public Schools, also known as Illinois district 205, serves more than 28,000 students in grades pre-K through 12 in more than 44 schools.124 RPS has four comprehensive high schools and more than 7,500 high school students.125

In 2010, a team of community stakeholders developed a new approach to high school education in RPS called the College and Career Academies of Rockford. Academies are small learning communities embedded within high schools that offer college and career prep curricula and “real-world experiences with local businesses and professionals, linking schoolwork and the
workplace.” Every RPS high school student chooses one of the following college and career academies:

- Business Academy
- Production Academy
- Service Academy
- Health Academy
- Creative and Performing Arts Academy*
- Gifted Academy*

Each academy is associated with several pathways, with the exception of the Gifted Academy, in which students can take courses from any of the other academies. A pathway is defined as a three-course sequence that begins in a student’s sophomore year; students choose one essential pathway course per year. Many RPS career pathways “offer students opportunities like dual credit, articulated credit or industry certification.”

### Academies and Pathways in Rockford Public Schools

<table>
<thead>
<tr>
<th>Academy</th>
<th>Pathways</th>
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<tbody>
<tr>
<td>Business Academy</td>
<td>• Business &amp; Entrepreneurship</td>
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<tr>
<td></td>
<td>• Studio Arts</td>
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<td></td>
<td>• Graphic Design</td>
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<td>• Information Technology</td>
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<td>• Construction</td>
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<td>• Industrial Technology</td>
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<td>• Manufacturing</td>
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<td></td>
<td>• Transportation Technology</td>
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<tr>
<td>Health Academy</td>
<td>• Bio-Medical/Lab Sciences</td>
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<tr>
<td></td>
<td>• Personal/Athletic Training</td>
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<tr>
<td></td>
<td>• Nursing/Pre-Med</td>
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<tr>
<td>Service Academy</td>
<td>• Public Safety</td>
</tr>
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<td></td>
<td>• RU Education (in partnership with Rockford University)</td>
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</tbody>
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*Note: Gifted Academy students can take courses from any of the other academies.*
Creative and Performing Arts*

- Dance
- Media Production
- Vocal Music Performance
- Instrumental Music Performance
- Studio Arts
- Technical Theatre
- Theatre Performing Arts

*The Creative and Performing Arts and Gifted academies are only offered at Auburn High School and require an audition and test-based admission, respectively

ROCK VALLEY COLLEGE

RVC is the Rockford region’s anchor postsecondary institution for GLCCPP. In 2017, it awarded more than 10,000 dual credit hours. In contrast to Harper College in the Northwest Suburbs, which awarded more than a quarter of its dual credit hours in technical courses and just over half in baccalaureate courses, over 90 percent of RVC’s dual credit hours came from baccalaureate courses (see Dual Credit Hours by Course Type below). RVC enrolled 681 dual credit students, representing about six percent of RVC’s total enrollment, compared to a state average of 10.5 percent.

RUNNING START AT RVC

RVC’s Running Start program is a significant driver of dual credit hours in Rockford. Through Running Start, students in grades 11 and 12 attend classes on RVC’s campus full-time, earning college credits and a high school diploma simultaneously. Running Start students earn about 32 to 42 college credit hours per year. During the 2018-19 school year, 242 students from seven of the 12 K-12 districts in RVC’s community college district are participating in the program. This means that high school students are taking approximately between 7,744 and 10,164 dual credit hours at RVC through Running Start. This is 92 percent of all baccalaureate dual credit hours high school students earned through RVC in FY17, and 85 percent of all dual credit hours.
RVC markets Running Start as a program for “select, qualified, academically motivated students.” Students must have a GPA of at least 3.0 and have completed required courses in math, science, and English with a grade of “B” or better in order to apply. They must also meet standardized test benchmarks in reading, English, and elementary algebra. Although Running Start aims to expand, since only a small number of students meet these criteria, growing the program is a challenge.

Historically, cost has also been an obstacle to the expansion of Running Start. RPS and RVC have made progress in this area. In the past, RPS paid RVC $5,500 per Running Start student; RPS officials complained that this exceeded in-district tuition based on credit hours. In 2015, the two institutions developed an agreement that RPS must pay RVC tuition based on the actual number of credit hours taken at RVC’s typical tuition rate. The total payment for RPS is capped at $180,000. This agreement also raised the cap on RPS student enrollment in Running Start from 30 to 40—which translates to a cost of $4,500 per student.

Running Start remains a niche program, serving about one percent of the total high school enrollment in RPS, and less than one percent of its 11th and 12th grade enrollment. Expanding dual enrollment access to a larger number and broader range of RPS students will require a new approach.

CHALLENGES AND BARRIERS

Under RVC’s current policy, high schools are responsible for managing the mechanics of dual credit program enrollment including advising students, helping them complete the enrollment information form and dual enrollment registration agreement, and ensuring they take the RVC AccuPlacer test.

RVC’s placement testing requirements are rigorous—so much so that they make RVC an outlier among community colleges in Illinois. For example, all RVC dual credit students must earn a college-ready score on the reading component of the AccuPlacer—even if they are taking only CTE or math courses. While many colleges require that students meet placement test benchmarks to be eligible for dual credit, most offer alternatives based on GPA or attainment, and few have such strict testing requirements for CTE courses, in particular. By contrast, of the 75 dual credit courses Harper College offers, only two—English 101 and Intermediate Japanese II—require some form of testing as a prerequisite, and only a handful even include it among several options for prerequisites.

With the exception of Running Start courses which are paid for with RPS funds, another obstacle to student access to dual enrollment is the requirement that RVC students pay for dual
credit courses taught on the college campus. These costs are comparable to those at Harper, including RVC’s charge of $115 per credit hour for tuition, plus fees.136 While K-12 districts generally cover tuition for Running Start students, they must pay for textbooks and transportation. RVC also charges students tuition and fees for dual credit courses offered on high school campuses. If an RVC faculty member teaches the course, students must pay 75 percent of the typical tuition—$86.25 per credit—plus fees. If a high school instructor teaches the course, students must pay 50 percent of the typical tuition—or $57.50 per credit.137

There is no written agreement between RPS and RVC about inter-institutional guidelines and procedures for dual enrollment. However, as of early 2019, RVC is developing a new Procedure Guide for its HS Connections program, which is based on Harper College’s guide for its early college program. RVC’s guide will establish procedures for 11 K-12 districts. Under a draft of the document from July 2018, the tuition for a dual enrollment course taught in a high school by a high school teacher would decrease to $50 per course.

To offer an RVC course for dual credit at a high school, high schools must identify teachers who meet HLC requirements; submit their unofficial college transcripts, Dual Credit Instructor Applications, and an Application to Offer Dual Credit Courses in High School; and notify RVC of whether the high school itself or participating students will be responsible for paying RVC tuition and fees.138 RVC department chairs and deans evaluate high school teachers’ credentials; approved high school teachers must submit a Dual Credit Instructor Personnel Information form. High schools that cannot identify a suitable instructor for a particular course can also request that RVC provide a faculty member. High schools must also submit each dual credit course’s syllabus, textbook information, and sample tests and/or assignments for annual review and approval by RVC. High schools must submit all required documentation about nine months before the course starts.

**Articulated Credit**

RVC has expressed interest in shifting its emphasis away from dual credit and toward articulated credit. Articulated college credit is awarded for a course or program taken while in high school which “articulates” or links with a course or program at RVC once some supplemental instruction is completed. Most community colleges have moved away from articulated credit because students can only use the credits they earn at the partner college and cannot transfer to other institutions.

At RVC articulated credit is awarded based on an Articulation Agreement between the high school and the college and is confined to CTE course sequences.139 Unlike dual credit coursework, articulated credit does not require the submission or review of student test scores.
or teacher credentials, and RVC charges no tuition or fees for it. High schools just need to apply. HLC teacher credentialing guidelines do not apply, nor do the administrative requirements associated with the Dual Credit Quality Act. Therefore, there is much less administrative burden when offering articulated credit compared to dual credit.

From a student perspective, dual credit is greatly preferable to articulated credit. With dual credit, students automatically earn both high school and college credit when they successfully complete a course. Many of these college credits are transferable to other postsecondary institutions. Conversely, articulated credit is only awarded once the students enrolls in the community college and completes supplemental work. The credit can only be used in the college with which the high school has an articulation agreement.

In order to earn college credit from RVC articulated credit coursework, students must: 140

1. Earn an “A” or “B” in the high school course
2. Enroll at RVC after graduating high school
3. Apply for articulated credit before registering for college classes
4. Complete college courses with a final grade of “A,” “B,” or “C” in the same career area and for the same number of credit hours as the original high school articulated coursework within two years of high school graduation, and
5. Contact RVC’s High School Connections Office “to initiate the credit being recorded” on their official RVC transcript

Furthermore, no other college will award students college credit based on high school coursework completed through articulated credit at RVC.

Columbus, Ohio

Columbus State Community College is the Columbus region’s postsecondary GLCCPP anchor partner. During the 2016-17 school year, CSCC awarded 34,034 College Credit Plus credits through 11,746 completed CCP courses. 141

There are six K-12 partners in the Columbus region, and all of them offer ECCP coursework through Columbus State. Those partners are: the Columbus City Schools, Dublin City Schools, Marysville Exempted Village School District, South-Western City Schools, Westerville City Schools, and Whitehall City Schools.
COLLEGE CREDIT PLUS IN COLUMBUS

Under CSCC’s procedures for CCP, K-12 students are responsible for navigating the application process, completing the required testing, attending an orientation session, selecting and enrolling in classes, getting a CSCC ID card, and securing a CSCC academic advisor. During orientation, students receive course recommendations based on the information they provide to CSCC about their high school graduation requirements; CSCC also “highly encourage[s]” students to review course selections with their high school guidance counselors.142

To gain approval to teach CCP courses, high school teachers must create an account with CSCC’s job site and apply to an open “dual credit” position. The application requires a resume/CV, undergraduate and graduate school transcripts, and one letter of recommendation from the teacher’s principal. The required academic credentials differ based on course type.143

In some cases, the qualifications necessary for high school adjuncts to teach CCP courses through CSCC exceed the HLC’s requirements. For example, teaching Ethics (PHIL 1130) requires a master’s degree in philosophy—a master’s degree in another discipline plus 18 graduate credit hours in a field relevant to philosophy is not sufficient. In other cases, credentialing requirements are less rigorous than the HLC standard. A high school teacher with a bachelor’s degree in a relevant discipline and relevant field experience can teach either Medical Terminology (MULT 1160) or Computer Concepts and Apps (CSCI 1101). Both of these courses likely fall under HLC’s definition of “occupational” courses, which justifies the lower threshold for teacher credentials.

For high school teachers who do yet have HLC’s required credentials, CSCC provides two other options that offer flexibility. One is a “facilitated model,” which allows high school teachers with some level of academic coursework or teaching experience in the discipline to facilitate a “technology-enhanced course in which a Columbus State faculty member would serve as the Teacher of Record and collaborate with the high school teacher to effectively and efficiently deliver the class.”144 Facilitated courses take place on K-12 school campuses.

Another alternative option is for high school teachers to serve as teachers of record for CCP courses that take place on high school campuses by qualifying under ODHE’s Transitioning with Quality provision. Under this provision, chief academic officers may make exceptions to typical credentialing standards for K-12 teachers who are “enrolled and making progress in educational program” to meet the standard, are being mentored by a faculty member who does meet the standard, and are “uniquely qualified for the course being taught.”145 According to ODHE’s guidelines for academic program review, these exceptions should be “carefully considered and
justified” and “reserved for a small number of uniquely qualified individuals.” While the facilitated model could be scalable, Transitions with Quality is almost certainly not.

Regardless of how a high school teacher becomes approved to teach CCP courses through CSCC, all new teachers must attend CSCC’s orientation and can participate in on-going professional development designed to improve instruction. In addition, districts or high schools (not individual teachers) must submit an “Academic Planning Document” to CSCC each year detailing the proposed list of courses they want to offer for dual enrollment via CCP.

<table>
<thead>
<tr>
<th>Snapshot: Required Academic Credentials for High School Adjuncts at Columbus State</th>
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The academic credentials required of a high school teacher who wishes to teach Columbus State courses through College Credit Plus vary substantially by course and department.

**College Success Skills (COLS 1101; Developmental Education; 1 credit):**

Master’s degree in any subject

**Ethics (PHIL1130; Humanities; 3 credits):**

Master’s degree in philosophy

**Composition I (ENGL 1100; English; 3 credits):**

Master’s degree in rhetoric, composition, or literature

OR master’s degree in related field plus 18 credit hours of graduate-level English courses, nine hours of which should be in graduate-level composition courses

OR master’s degree in related field, plus experience teaching English at the college level
Algebra-Based Physical Sciences (PHYS1200; Biological & Physical Sciences; 5 credits):

Master’s degree in physics

OR master’s degree, plus a “cohesive set of 18 semester hours of discipline-relevant graduate coursework”

Biological Sciences (BIO 1113; Biological & Physical Sciences; 4 credits):

Master of science degree in discipline AND minimum of two years of experience high school teaching

Basic Concepts in Health Care (MLT 1100; Allied Health Professions; 2 credits):

Bachelor’s degree in any subject

Medical Terminology (MULT 1160; Allied Health Professions; 2 credits):

Bachelor’s degree in health-related area (master’s preferred) AND “recent relevant experience”

Computer Concepts and Apps (CSCI 1101; CSCI; 3 credits):

Bachelor’s degree in computer science or related field AND two to three years of experience teaching general computer science concepts and theory AND Microsoft Office proficiency or current Microsoft Office specialist certification
HOW TO EXPAND DUAL ENROLLMENT ACCESS WITH QUALITY

Higher Learning Commission

The Higher Learning Commission exerts control over dual enrollment policy and practice throughout the Midwest, with the goal of ensuring high quality implementation. By requiring that high school instructors must have specific academic credentials to teach dual enrollment courses, HLC has limited the number of high school instructors who are eligible to teach. This also constrains the expansion of and students' access to dual enrollment.

Through the following recommendations, HLC can increase student access by easing the transition to full compliance and increasing flexibility in how teachers become certified:

- Extend the deadline for member states and institutions to comply with its new teacher credentialing guidelines to 2022 OR allow new states and institutions to apply for the extension

- Adopt a “provisional eligibility” rule that allows high school teachers who do not meet current HLC requirements to teach a dual enrollment course in a particular discipline while they earn the necessary credentials (similar to the new state law in Illinois and agency regulations in Ohio)

- Expand the definition of “discipline-relevant” graduate credentials to include broad domains like science, math, English, and social studies (e.g. a teacher with a master’s degree in chemistry can teach a course in biology); OR reduce the number of required discipline-relevant graduate credits from 18 to nine for teachers who have a master’s degree in an associated field (e.g. a teacher with a master’s degree in chemistry can teach a course in biology if she has at least nine graduate credits in a biology-related discipline)

- Use an evaluation process similar to that for CTE teachers to determine the competency or equivalent experience of teachers in the academic disciplines who want to teach dual enrollment courses
State Recommendations

Illinois

Under SB 2838, the state-level dual enrollment ecosystem is already conducive to both the supply and quality of dual credit courses. In particular, the revised Dual Credit Quality Act and the PWR Act provide a worthy legislative template for other states to follow. Illinois is also the only GLCCPP state that has a “hold harmless” state funding policy for both high schools and colleges.

There are several opportunities to further expand and increase the quality of dual credit coursework in Illinois:

- Incorporate a statewide structure for sharing the costs of dual enrollment into the Model Partnership Agreement that will be developed under the revised Dual Credit Quality Act; this structure should place a minimal cost burden on students and families, particularly those who face the greatest economic barriers; if necessary to keep costs down, explore options for tuition/fee waivers that are based on family income, limited to a certain number of credits, and/or limited to certain courses

- Empower counselors, teachers, and administrators to waive placement test requirements for students who meet certain academic measures such as a pre-determined GPA

- Establish formal statewide guidelines regarding the transferability of the state’s new teacher Dual Credit Endorsements across colleges and disciplines

- Give preference for new dual credit grants under SB 2838 to proposals that emphasize collaboration and alignment between high school and college instructors who teach similar courses

- Outline the process and fees that K-12 districts can use to request that faculty from their partner community colleges teach dual credit courses on high school campuses within the Model Partnership Agreement

- Include CTE courses in the existing Illinois Articulation Initiative along with general education and core courses
• Eliminate ICCB’s current prohibition on courses that award both high school and college credit to some enrollees and only high school credit to other enrollees. This limitation, combined with restrictions on student eligibility, makes it difficult for high schools to meet the minimum enrollment necessary to offer certain dual enrollment courses at an affordable cost

**Ohio**

Ohio’s College Credit Plus program has few peers in terms of encouraging dual enrollment course offerings and ensuring consistent and fair guidelines for student eligibility to participate in them.

The following recommendations can further increase dual enrollment access and quality in Ohio:

• Improve state funding conditions by establishing a “hold harmless” policy for dual enrollment formula-based funding (like in Illinois) and/or restoring dual enrollment grant funding opportunities that were lost when the Straight-A grant program ended

• Expand the purview of the state’s College Credit Plus Advisory Committee to include programmatic recommendations in order to better leverage CCP to help achieve Ohio’s 65 by 25 attainment goal

• Incorporate dual enrollment/ECCP into ODE’s 2019-24 strategic plan for education

• Modify Ohio’s ESSA accountability plan to allow students who earn dual enrollment credits to “count” in the numerator of the state’s “Prepared for Success” metric, even if students do not earn a passing ACT/SAT score, honors diploma, or industry-recognized credential; allow dual enrollment credit to “count” for additional points if students earn more than three such credits

**Wisconsin**

Wisconsin has considerable opportunities to systematize and enhance its dual enrollment ecosystem through state legislation and policy through the following changes:

• Establish a statewide committee that includes DPI, the UW System, and WTCS charged with developing dual enrollment policy linked to Wisconsin’s statewide 60 Forward
attainment goal

- Improve state funding conditions by establishing a “hold harmless” policy for all dual enrollment formula-based funding (like in Illinois)

- Support the expansion and enhancement of dual enrollment offerings at technical colleges (through SCN), so that they receive funding that is proportional to what non-technical colleges and universities receive under ECCP

- Modify state guidelines on student eligibility for both ECCP and SCN to make them more inclusive and more consistent across institutions; consider using Ohio’s CCP student eligibility guidelines as a partial model

**DUAL ENROLLMENT AND THE ROAD AHEAD**

All four GLCCPP communities are making notable strides—and facing complex challenges—in their efforts to expand dual enrollment *access with quality*. Their accomplishments to date, detailed herein, make them models for communities across the nation that are undertaking this important work.

At the same time, all four regions have work ahead of them. None of the 11 K-12 districts associated with GLCCPP has yet adopted national best practices to incentivize teachers to earn the credentials HLC deems necessary to teach dual enrollment courses. In the long term, the GLCCPP communities will need to make progress in this area to create sufficient and sustainable pipelines of qualified dual enrollment instructors.

In the shorter term, it also seems fair to say that none of the four regions has taken full advantage of the flexibility that is already afforded them around teacher credentialing. This includes HLC compliance extensions, state-level policies that allow provisional approval for high school teachers who are in the process of earning required credentials, and the inter-institutional sharing of college professors—including facilitated models of course delivery. If GLCCPP communities can leverage a strategic combination of these factors, all of them can successfully address their needs for dual enrollment instructors, even without significant changes in law, policy, or funding.

None of this makes the work easy. Dual enrollment requires institutions that have different cultures, values, procedures, and funding incentives to work together in virtually unprecedented
ways. Its impact on institutional revenues, labor and community relations, and student enrollment is difficult to predict (and sometimes even hard to assess in retrospect).

Nevertheless, the benefits of dual enrollment for students, families, and communities make expanding it a professional and priority. In a national environment where college debt often exceeds long-term earnings, dual enrollment saves students and families money. A rigorous research base demonstrates that dual enrollment significantly improves student outcomes in high school achievement, college enrollment, and educational attainment. It works for students who have a wide range of abilities, backgrounds, and aspirations.

The why behind dual enrollment is already crystal clear. Going forward, the efforts of the GLCCPP partners promise to break new ground on the how.
APPENDIX

Local Considerations

Local GLCCPP stakeholders can generate positive change to increase the supply and improve the quality of dual enrollment coursework in their own communities through the following considerations:

- Offer high school teachers financial incentives to earn credentials required by HLC guidelines (e.g. tuition reimbursement, permanent salary increases for advanced credentials, and stipends for dual enrollment courses); provide other non-monetary incentives as feasible (e.g. release time or planning time)

- Pursue NACEP accreditation to enhance, substantiate, and advertise dual enrollment programmatic quality

- Facilitate greater collaboration, cooperation, and coordination among high school and college instructors who teach dual enrollment coursework to enhance both quality (directly, by improving curriculum, instruction, and assessment) and supply (indirectly, by reducing faculty resistance and increasing faculty capacity and commitment).

**Madison, Wisconsin**

The following considerations can help stakeholders in Madison, Wisconsin increase the supply and quality of dual enrollment:

- Offer DTC courses that are currently available at only some MMSD high schools at all MMSD high schools

- Centralize the process for students and teachers to apply for dual enrollment coursework at MC by appointing designated liaisons at MMSD and MC; consider using Northwest Suburbs processes as a template (see the illustration of Dual Enrollment Coordination in the Northwest Suburbs on page 39 of this report)

- Make a concerted effort to educate families about the benefits of dual enrollment coursework for all children; highlight that credits earned through MC are applicable and transferable to four-year colleges including UW-Madison and other UW System colleges; offer at least one UW-Madison course for DTC courses at all MMSD high schools

- Integrate dual enrollment coursework more substantially and visibly into MMSD’s Personalized Pathways model; consider housing MMSD “core” academic administration and dual credit administration within the same department to enhance internal
- Take advantage of MC’s extension until 2022 to comply with HLC credentialing guidelines to create a robust pipeline of MMSD teachers for dual enrollment courses, including teachers who do not currently meet MC guidelines

- Work proactively with the MMSD teacher union to address and preempt any potential concerns about the effect of expanding dual credit on the size of the unionized teaching force

- Clarify and/or formalize MMSD-MC processes to begin to offer a new MC courses for dual credit

**Northwest Suburbs of Chicago, Illinois**

Local stakeholders in the Northwest Suburbs of Chicago, Illinois can consider the following actions to promote dual enrollment in the region:

- Create additional opportunities to support collaboration between district and Harper College dual enrollment faculty; consider consulting MC regarding its processes as a model

- Offer more dual enrollment courses at all high schools within partner districts

- Instead of offering BIO135 (Introduction to Anatomy and Physiology) for dual credit, offer both BIO160 (Human Anatomy) and BIO161 (Human Physiology), since they are applicable to a larger range of promising credentials in the health science pathway; as an alternative, revise the pathway requirements to allow for BIO135 instead of BIO160 and BIO161

- Waive or discount tuition and fees for dual enrollment courses that are offered on college campuses (as in Ohio and Wisconsin)

**Rockford, Illinois**

In Rockford, Illinois, local stakeholders can consider the following to increase dual enrollment quality and supply:

- Offer dual credit instead of articulated credit whenever possible in order to maximize credit attainment and transferability for students (with the caveat that any potential college credit is better than none)

- Increase the number of pathways-specific courses available for dual credit through RVC and link dual enrollment course offerings more explicitly to RPS pathways and to RVC credentials and certifications
• Conduct a comprehensive review of placement-test-based restrictions on student eligibility for dual enrollment coursework and eliminate unnecessary requirements; in particular, reduce or eliminate test-based requirements for CTE dual enrollment courses.

• Expand RVC dual credit offerings overall and in non-baccalaureate domains, especially “technical” courses, provided that they satisfy key prerequisites or distribution requirements for postsecondary credentials; increase dual enrollment options for students who do not meet the high bar to participate in Running Start.

• To maximize student participation and attainment, offer as many dual credit courses on RPS high school campuses as possible.

• Waive tuition and fees for dual credit courses taught on high school campuses by qualified high school faculty.

_Columbus, Ohio_

Local stakeholders in the Columbus, Ohio region can consider the following:

• Centralize the process for students and teachers to apply for dual enrollment coursework at CSCC by appointing designated liaisons at partner K-12 districts and CSCC; consider using Northwest Suburbs processes as a template (see the illustration of Dual Enrollment Coordination in the Northwest Suburbs on page 39).

• Audit CSCC’s course-specific teacher credentialing requirements and eliminate any that exceed HLC’s requirements.

• Better publicize partner K-12 districts’ 15- and 30-credit pathways; revise pathways as necessary to better align with labor market information and with the high-value credentials and certificates that are available through CSCC.


6 The technical assistance providers for GLCCPP are ConnectEd: The California Center for College and Career, based in Berkeley, CA; JFF, based in Boston, MA; and the Education Systems Center of Northern Illinois University (Ed Systems), based in Chicago, Illinois.


13 Aaron Horn and Jennifer Zinth, “Increasing the Supply of Qualified High School Teachers for Dual Enrollment Programs: An Overview of State and Regional Accradiator Policies,” June 2018, Midwestern

Smith, 2018.

Steve Kauffman in conversation with the author, March 2018.

The deadline to submit extensions was December 2016; the HLC has stated that it will not consider additional extensions going forward.


Aaron Horn, Leah Reinert, Sung Tae Jang, and Jennifer Donnay Zinth, Faculty Qualification Policies and Strategies Relevant to Dual Enrollment Programs: An Analysis of States and Regional Accreditation Agencies, https://www.mhec.org/sites/default/files/resources/20160701Faculty_Qualifications_2.pdf.

Southern Association of Colleges and Schools Commission on Colleges, Accreditation FAQs, http://www.sacscoc.org/FAQsanswers.asp.


Four-year colleges (including Eastern Illinois University, National Louis University, and Northeastern Illinois University) are also involved in dual enrollment in Rockford and in the Northwest Suburbs of Chicago, but they are not directly involved in GLCCPP.

In Illinois “dual credit” refers specifically to courses that provide both high school and college credit, and which can be taught at the high school, college, online, or via distance learning. Conversely “dual enrollment” refers to courses high school students take on college campuses, for which they earn college credit but do not necessarily earn high school credit.

For example, an Ohio high school teacher who wants to teach BIO 1113 at Columbus State Community College needs a master’s degree in the discipline and at least two years of experience teaching high school —under SB 2838, this requirement would now be prohibited in Illinois.

Taylor et al., 2014.
Students pay some or all of the tuition and fees associated with dual enrollment at roughly 60 percent of Illinois' community colleges.

This includes the Educational Service Center of Central Ohio (ESCCO), which is a lead partner for the Columbus region's GLCCPP work.

Students may still be responsible for costs for dual enrollment courses offered at private colleges and universities.

Jeremy P. Kelley and Chris Stewart, “High schoolers have free college options; Ohio’s College Credit Plus program has April 1 deadline,” Dayton Daily News, January 2015.

Larisa Harper, College Credit Plus [webinar], November 2017.


Ohio Department of Education, College Credit Plus.


Ohio Department of Education, College Credit Plus.

73 Smola, 2018.


75 Larisa Harper in conversation with the author, June 2018.

76 Ohio Legislative Service Commission, *LSC Greenbook, Analysis of the Enacted Budget, Department of Higher Education*, August 2015, p. 5.


78 Ohio Revised Code, 3365.02 College Credit Plus program, http://codes.ohio.gov/orc/3365.02.


80 Kelley and Stewart, 2015.


82 Smith, 2018.

83 Ohio Department of Higher Education, $10 Million in Grant Funds Awarded to Help Educators Earn Credentials to Teach College Credit Plus Courses, https://www.ohiohighered.org/press/10_million_grant_funds_awarded_help_educators_earn_credentials_to_teach_college_credit_plus.

84 Smith, 2018.

Upon the program’s demise, members of the Straight A grant’s advisory panel published an op-ed in the *Cleveland Plain Dealer*, noting “we know of no rigorous empirical analysis of Straight A—either as a whole or at individual grantee sites.”


88 Ohio Department of Education, *Revised State Template for the Consolidated State Plan: The Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act*, revised January 2018, http://education.ohio.gov/getattachment/Topics/Every-Student-Succeeds-Act-ESSA/OH_ESSA_SUBMISSION.pdf.aspx. At least theoretically, the “percentage” of students who qualify as “Prepared for Success” in a given school or district could be greater than 100, resulting in a proportion that is greater than one.

89 Wisconsin Department of Public Instruction, *Communication Resources*, https://dpi.wi.gov/statesupt/every-child-graduate/communication-resources.

90 University of Wisconsin System, *Campuses*, https://www.wisconsin.edu/campuses/. Effective as of July 2018, the UW System’s 13 “freshman-sophomore campuses” merged (somewhat controversially) with and became “branch campuses” of seven of its four-year colleges. This restructuring also dissolved the statewide University of Wisconsin-Extension as its own entity.


99 Tahira Choudary, in conversation with the author, July 2018.
100 Wisconsin Department of Public Instruction, State Aid for School Districts Under the Early College Program, https://dpi.wi.gov/sites/default/files/imce/acp/12-04-17%20ECCP%20state%20aid%20memo%20to%20districts.pdf.
102 Wisconsin State Legislature, Wisconsin Statutes Chapter 118.55.
103 Wisconsin State Legislature, Wisconsin Statutes Chapter 118.53: Children at risk of not graduating from high school, https://doc.data.wisconsin.gov/statutes/statutes/118/153/1/a.
112 Madison Area Technical College, Dual Credit Courses, https://madisoncollege.edu/dual-credit.
113 Madison Area Technical College, Dual Credit Courses.
114 Madison Area Technical College, Underage Student Registration: Course Options; https://madisoncollege.edu/underage-registration.
Eighth graders are also eligible to participate in dual enrollment via UW Colleges, subject to different requirements.

**Universal Undergraduate Credit Transfer Agreement Between the University of Wisconsin System and Wisconsin Technical College System (Revised 2018),**

Credits from certain Madison College courses are also transferable to UW System colleges under UCTA. However, MC does not currently offer any of the courses that UCTA currently covers for dual transcripted credit.


**Tuition for on-campus dual credit courses is $119.25 per credit hour for 2016, in addition to a technology fee of $7 per credit hour and a per-student dual credit fee of $50.**

**Northwest Educational Council for Student Success, Strategic Memorandum of Understanding, Fall 2010,** [https://docs.google.com/file/d/0B6JOEVd7hLXwSER4MDZVX0E4Wjg/edit](https://docs.google.com/file/d/0B6JOEVd7hLXwSER4MDZVX0E4Wjg/edit).

**Harper College, Dual Credit and Credit by Exam,** [https://www.harpercollege.edu/start/highschool/dual.php](https://www.harpercollege.edu/start/highschool/dual.php).

**GLCCPP, Community of Practice, Focus: Secondary/Postsecondary Alignment [PowerPoint presentation], October 4-5, 2018.**

**Rockford Public Schools, District,** [https://www3.rps205.com/district/Pages/default.aspx](https://www3.rps205.com/district/Pages/default.aspx).


**Doug Jensen, “My view: Get a Running Start on your future,” Rockford Register Star,**

**Corina Curry and Isaac Guerrero, “Rockford School District poses a hurdle to ‘Running Start’ program, say Rock Valley College trustees,” Rockford Register Star, June 2015,**

Rock Valley College, [Running Start] Admission and Timeline,
[https://www.rockvalleycollege.edu/Admission/EarlyCollege/Admission-and-Timeline.cfm](https://www.rockvalleycollege.edu/Admission/EarlyCollege/Admission-and-Timeline.cfm).

**Corina Curry, “Rockford School District sets Aug. 17 start date, expands Running Start program,” Rockford Register Star, October 27, 2015,**
If local districts paid RVC $4,500 per student for each of the 242 students currently enrolled in Running Start, RVC would generate $1.089 million in tuition from the program. This would be in addition to the roughly $700,000 RVC stands to receive in state funding from all dual credit offerings (based on FY17 enrollment numbers), and would not include any local tax revenues.


Columbus State Community College, College Credit Plus (Dual Credit) Frequently Asked Questions, https://www.cscc.edu/academics/college-credit-plus/faqs.shtml.

Columbus State Community College, College Credit Plus Course Information Sheet, https://www.cscc.edu/academics/college-credit-plus/pdfs/CCP%20Course%20Info.pdf.

Columbus State Community College, College Credit Plus (Dual Credit) High School Teachers and Districts, https://www.cscc.edu/academics/college-credit-plus-high-schools.shtml.


Columbus State Community College, College Credit Plus (Dual Credit) High School Teachers and Districts.